KEKER VAN NEST & PETERS LATHAM & WATKINS LLP MORRISON FOERSTER

January 14, 2026

VIA ECF

Hon. Ona T. Wang
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Cc: *All Counsel of Record (via ECF)*

Re: ***Correction and Supplemental Letter re Dkt. 1112, OpenAI's Opposition Brief to Plaintiffs' Request for Production of OpenAI Capitalization Tables and Musk Materials****, In re OpenAI, Inc. Copyright Infringement Litigation*, No. 1:25-md-03143
This Document Relates To: All Actions

Dear Judge Wang:

OpenAI writes to: (1) correct Dkt. 1112, OpenAI's Opposition Brief to Plaintiffs' Request for Production for OpenAI Capitalization Table and *Musk* Materials; and (2) provide supplemental information.

Correction

In its Opposition, OpenAI misstated that "Mr. Sutskever's counsel has made clear to counsel for OpenAI that they object to the production of the memos and would seek relief if this Court orders their production." Dkt. 1112 at 3–4. As of the date of that filing (January 8, 2026), that sentence should instead have stated as follows: "Mr. Sutskever's counsel has made clear to counsel for OpenAI that they may object to the production of the memos and seek relief if this Court orders their production."

Supplemental Information

On January 14, 2026, counsel for Mr. Sutskever informed the Parties that "we do not intend to oppose the production of any of these documents, and we do not object to OpenAI producing them (so long as they are designated AEO), if OpenAI agrees or is ordered to do so." A. Holland Email to N. Goldberg, dated January 14, 2026.

Sincerely,

KEKER, VAN NEST & PETERS LLP[1]	LATHAM & WATKINS LLP	MORRISON & FOERSTER LLP
/s/ Christopher S. Sun	*/s/ Herman Yue*	*/s/ Rose S. Lee*
Christopher S. Sun	Herman Yue	Rose S. Lee

[1] All parties whose electronic signatures are included herein have consented to the filing of this document.