UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC. COPYRIGHT INFRINGEMENT LITIGATION	Case No. 1:25-md-03143 (SHS) (OTW)
This Document Relates To: All Actions	**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

PLEASE TAKE NOTICE that Defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OpenAI LP, OpenAI Holdings, LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, OpenAI Startup Fund Management LLC, and OAI Corporation (collectively "OpenAI Defendants") move this Court for an order in compliance with Local Rule 1.4 permitting the withdrawal in the above-captioned action of the following attorneys:

Allison L. Stillman
Latham & Watkins LLP
1271 Avenue of the Americas
New York, NY 10020

Joseph R. Wetzel, Jr.
Latham & Watkins LLP
505 Montgomery Street
Ste. 2000
San Francisco, CA 94111

Rachel R. Blitzer
Latham & Watkins LLP
1271 Avenue of the Americas
New York, NY 10020

Michael A. David
Latham & Watkins LLP
1271 Avenue of the Americas
New York, NY 10020

The OpenAI Defendants will continue to be represented by Latham & Watkins LLP as well as other firms in this proceeding including Morrison & Foerster LLP and Keker, Van Nest & Peters LLP, and no party will be prejudiced if this Motion is granted.

Dated: January 30, 2026

Respectfully submitted,

LATHAM & WATKINS LLP

/s/ Elana Nightingale Dawson
Elana Nightingale Dawson

Attorneys for Defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OpenAI LP, OpenAI Holdings, LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, OpenAI Startup Fund Management LLC, and OAI Corporation

SO ORDERED:

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