UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This document relates to: No. 1:23-cv-08292 (SHS) (OTW) (consol.) No. 1:25-cv-03482 (SHS) (OTW) (consol.)	Case No. 25-md-3143-SHS-OTW Hon. Sidney H. Stein

JOINT STIPULATON AND [PROPOSED] ORDER TO MODIFY CASE SCHEDULE IN CLASS CASES

The parties in the Class Cases[1] by and through their respective counsel of record hereby stipulate and agree to the following Proposed Order to Modify the Case Schedule Applicable to the Class Cases to modify the current deadlines for class certification briefing and expert reports.

STIPULATION AND PROPOSED ORDER

1. Currently, class certification opening motions are due 21 days following the Court's ruling on the Motions for Summary Judgment, with oppositions due 28 days after opening briefs, and replies due 21 days following oppositions. *See* Dkt. 238 at 4.

2. To address the need for any class certification specific expert reports, the parties stipulate that class certification experts and expert discovery will occur after summary judgment. The parties further stipulate to submit joint or competing proposals to the Court for a schedule regarding class certification expert disclosures, class certification expert discovery, class certification *Daubert* briefing, and substantive briefing on class certification within two weeks of this Court's order on summary judgment.

3. The proposed schedule reflecting the remaining dates on the Court's Scheduling Order, Dkt. 238, and the proposed modification to the class certification deadlines follows:

Event	Current Deadline	Proposed Deadline
Close of fact discovery	**February 27, 2026**	**No change**
Close of expert discovery (includes opening, rebuttal, reply)	**July 17, 2026** *Opening Reports: April 10, 2026* *Rebuttal Reports: May 8, 2026* *Reply Reports:*	**No change**

[1] Nos. 1:23-cv-08292 (SHS) (OTW) (consol.); No. 1:25-cv-03482 (SHS) (OTW) (consol.).

Event	Current Deadline	Proposed Deadline
	June 5, 2026	
Last day to file Dispositive motions and date for filing Dauberts (all cases)[2]	**August 14, 2026**	**No change**
Oppositions to Motions for Summary Judgment and to *Daubert* motions	**September 18, 2026**	**No change**
Replies in support of Summary Judgment and *Daubert* motions	**October 16, 2026**	**No change**
Hearing on Motions for Summary Judgment	**November 18, 2026** (or another date convenient for the Court)	**No change**
Class certification (consolidated class case)	**Current (Dkt. 238):** **Motion:** 21 days after ruling on Motions for Summary Judgment **Opposition:** 28 days later **Reply:** 21 days later	The parties will submit joint or competing proposals to the Court for a schedule regarding class certification expert disclosures, class certification expert discovery, class certification *Daubert* briefing, and substantive briefing on class certification within two weeks of this Court's order on summary judgment.
Motions in Limine	**Date to be determined by the Court**	**No change**
Ready trial date	**Date to be determined by the Court**	**No change**

[2] This deadline for *Daubert* motions shall not apply to issues that may be raised on remand to transferor courts, and by agreeing to this deadline no party waives its right to seek to have particular issues resolved on remand.

IT IS SO STIPULATED.

Dated: February 4, 2026

By: */s/ Jeffrey S. Jacobson*

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Dated: February 4, 2026

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SO ORDERED.

Dated: _____

HON. SIDNEY H. STEIN
United States District Judge