UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: All Actions	25-md-3143 (SHS) (OTW) **PLAINTIFFS' MOTION TO SEAL**

Under paragraph 34 of the Stipulated Protective Order in this case (Dkt. 367), Class and News Plaintiffs (collectively, "Plaintiffs") respectfully seek to provisionally file under seal portions of their Renewed Motion to Compel OpenAI to Produce Project Giraffe Data and some of the exhibits attached thereto. Plaintiffs seek to provisionally file portions of their Motion and the exhibits attached thereto under seal because they discuss documents and information that OpenAI has designated as Protected Discovery Material under the Protective Order. Dkt. 367 ¶ 34. Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. *Id.* Plaintiffs will review OpenAI's filings, and if necessary, confer about any disagreement.

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