UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGMENT LITIGATION This Document Relates to: THE NEW YORK TIMES COMPANY v. MICROSOFT CORPORATION, et al. No. 23-cv-11195 DAILY NEWS, LP, et al. v. MICROSOFT CORPORATION, et al. No. 24-cv-3285	25-md-3143 (SHS)(OTW) **PLAINTIFFS' MOTION TO SEAL**

Under the Stipulated Protective Order in this case (Dkt. 474), The New York Times and the *Daily News* Plaintiffs ("Plaintiffs") respectfully seek to provisionally file under seal portions of their letter motion for a protective order and two exhibits being filed today in response to OpenAI's Subpoena of Tom Goldstein. Plaintiffs seek to file portions of their letter motion under seal because exhibits to the letter were designated as Protected Discovery Material by Defendants under the Protective Order. Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. Plaintiffs will review Defendants' filings, and if necessary, confer about any disagreement.

Dated: February 26, 2026

/s/ Ian B. Crosby
Ian B. Crosby
Susman Godfrey L.L.P.

/s/ Steven Lieberman
Steven Lieberman
Rothwell, Figg, Ernst & Manbeck