UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:	:	
OPEN AI, INC., COPYRIGHT INFRINGEMENT LITIGATION	:	No. 25-md-3143 (SHS) (OTW)
This Document Relates To:	:	
All Actions	:	

DECLARATION OF MAILE YEATS-ROWE IN SUPPORT OF OPENAI'S LETTER MOTION TO SEAL

I, Maile Yeats-Rowe, hereby declare as follows:

1. I am Senior Litigation Counsel at OpenAI. I submit this declaration in support of OpenAI's letter motion to seal, filed concurrently herewith. I have personal knowledge of the facts set forth below and if called as a witness, could testify competently thereto.

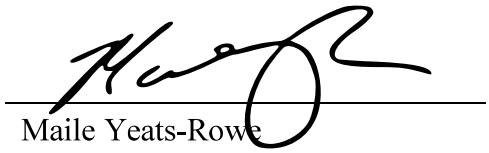
2. I have been informed and understand that OpenAI moved to seal material in (1) Exhibit I to News Plaintiffs' Motion for a Protective Order Regarding Tom Goldstein Subpoena (ECF 1356-9) and (2) OpenAI's Responsive Case Management Conference Brief to ECF 1383 and its accompanying Exhibits 1, 4, and 7. The information OpenAI seeks to seal was designated by OpenAI as highly confidential pursuant to the Stipulated Protective Order, ECF 367.

3. Based on my review, the information OpenAI seeks to seal or redact from Plaintiffs' Exhibit I, OpenAI's response brief, and OpenAI's Exhibits 1, 4, and 7 thereto comprises highly sensitive and confidential technical and internal business information about OpenAI's technology and business strategies that could be unfairly used by its competitors if made public.

4. Exhibit I to News Plaintiffs' Motion for a Protective Order Regarding Tom Goldstein Subpoena and OpenAI's Responsive Case Management Brief and accompanying Exhibits 1, 4, and 7 contain confidential information about the processes that OpenAI employs to train and evaluate LLMs, including confidential discussions regarding measures for mitigating potential content regurgitation, specific data figures, costs associated with data storage, data analysis, and details of ChatGPT's architecture contained in an excerpt from a JSON file, which are highly sensitive and proprietary. OpenAI generally does not publicly disclose such information. Moreover, disclosure of such information would give OpenAI's competitors insight into its proprietary development processes and cause competitive harm to OpenAI in a nascent and highly competitive market.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 5th day of March 2026, in San Francisco, California.



Maile Yeats-Rowe
Senior Litigation Counsel
OpenAI