UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: OpenAI, Inc. Copyright Infringement Litigation This Document Relates To: Case No. 1:23-cv-08292 Case No. 1:23-cv-10211 Case No. 1:25-cv-03482	Case No. 1:25-md-3143 (SHS) (OTW)

STIPULATION FOR VOLUNTARY DISMISSAL OF PLAINTIFF MATTHEW KLAM

Pursuant to Rule 41(a)(2) and Rule 21 of the Federal Rules of Civil Procedure, class Plaintiffs and Defendants OpenAI, Inc., OpenAI OpCo LLC, OpenAI GP LLC, OpenAI, LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, OpenAI Startup Fund Management LLC, and Microsoft Corporation ("Defendants") (collectively, the "Parties"), hereby stipulate and agree as follows:

WHEREAS, following discovery, Plaintiffs seek dismissal of Mr. Klam as a class representative;

WHEREAS, more than a dozen other Plaintiffs remain as class representatives and Plaintiffs contend the dismissal of Mr. Klam's claims for his asserted works will not have any adverse effect on the representation of the proposed class;

WHEREAS, Plaintiffs and Defendants reserve the right to make use of all discovery produced by Mr. Klam in support of all arguments and defenses they may make in the action, all of which they reserve;

Accordingly, the Parties stipulate and agree to dismiss Plaintiff Matthew Klam as a plaintiff without prejudice, subject to the Court's approval, with each party to bear its own attorney's fees and costs.

Consistent with the above, the Parties respectfully request that the Court enter the concurrently submitted proposed order.

Dated: March 13, 2026

/s/ Justin A. Nelson
Justin A. Nelson (pro hac vice)
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Telephone: 713.651.9366
jnelson@susmangodfrey.com

Interim Lead Counsel for Class Plaintiffs

Alejandra C. Salinas (pro hac vice)
Amber B. Magee (pro hac vice)
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Tel.: 713.651.9366
asalinas@susmangodfrey.com
amagee@susmangodfrey.com

Rohit D. Nath (pro hac vice)
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: 310.789.3100
rnath@susmangodfrey.com

J. Craig Smyser
Charlotte Lepic
Henry Walter
SUSMAN GODFREY L.L.P.
One Manhattan West, 51st Floor
New York, NY 10001
Tel.: 212.336.8330
csmyser@susmangodfrey.com
clepic@susmangodfrey.com
hwalter@susmangodfrey.com

Jordan W. Connors (pro hac vice)
SUSMAN GODFREY L.L.P.
401 Union Street, Suite 3000
Seattle, WA 98101
Tel.: 206.516.3880

jconnors@susmangodfrey.com

Counsel for Class Plaintiffs

Dated: March 13, 2026

MORRISON & FOERSTER LLP

/s/ Tiffany Cheung

Tiffany Cheung (*pro hac vice*)
tcheung@mofo.com
Joseph C. Gratz (*pro hac vice*)
jgratz@mofo.com
Caitlin Sinclaire Blythe (*pro hac vice*)
cblythe@mofo.com
425 Market Street
San Francisco, CA 94105
Telephone: 415.268.7000

Rose S. Lee (*pro hac vice*)
roselee@mofo.com
755 Page Mill Road
Palo Alto, CA 94304
Telephone: 650.813.5600

LATHAM & WATKINS LLP

Andrew M. Gass (*pro hac vice*)
andrew.gass@lw.com
San Francisco, CA 94111
Telephone: 415.391.0600

Sarang V. Damle
sy.damle@lw.com
Luke A. Budiardjo
luke.budiardjo@lw.com
1271 Avenue of the Americas
New York, NY 10020
Telephone: 212.906.1200

Elana Nightingale Dawson (*pro hac vice*)
elana.nightingaledawson@lw.com
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Telephone: 202.637.2200

Allison S. Blanco (*pro hac vice*)
allison.blanco@lw.com
650 Town Center Drive, 20th Floor
Costa Mesa, CA 92626
Telephone: 714.540.1235

KEKER, VAN NEST & PETERS LLP
Robert A. Van Nest (*pro hac vice*)
rvannest@keker.com
R. James Slaughter (*pro hac vice*)*
rslaughter@keker.com
Paven Malhotra
pmalhotra@keker.com
Michelle S. Ybarra (*pro hac vice*)
mybarra@keker.com
633 Battery St.
San Francisco, CA 94111
Telephone: 415.391.5400

Attorneys for OpenAI

Dated: March 13, 2026

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Annette L. Hurts
Annette L. Hurst (*pro hac vice*)
The Orrick Building
405 Howard Street
San Francisco, CA 94105
ahurst@orrick.com
Telephone: 415.773.5700

Attorney for Defendant Microsoft Corporation

SO ORDERED.

Dated: _____

_____
Hon. Sidney H. Stein
United States District Judge

* All parties whose electronic signatures are included in this filing have provided consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

CERTIFICATE OF SERVICE

I, Bryan L. Clobes, hereby certify that on March 13, 2026, I caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Southern District of New York using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Bryan L. Clobes