Exhibit 1

From:	Alex Frawley
To:	"Joshi, Vishakha S."; KVP-OAI; OpenAICopyright; Latham OpenAI Copyright Team
Cc:	Reaghan E. Braun (via NewsPlaintiffs-Service list); Alejandra Salinas (via OAI-NDCA-SDNY list); #NewYorkTimes-Microsoft-FDBR; NewYorkTimes_Microsoft_OHS@orrick.com
Subject:	RE: In re OpenAI
Date:	Wednesday, April 29, 2026 1:04:00 PM
Attachments:	image001.png

Yes that works. Please send an invite. Thanks!

From: Joshi, Vishakha S. <VJoshi@mofo.com>
Sent: Wednesday, April 29, 2026 12:59 PM
To: Alex Frawley <AFrawley@susmangodfrey.com>; KVP-OAI <kvpoai@keker.com>; OpenAICopyright <OpenAICopyright@mofo.com>; Latham OpenAI Copyright Team <openaicopyrightlitigation.lwteam@lw.com>
Cc: Reaghan E. Braun (via NewsPlaintiffs-Service list) <newsplaintiffs-service@simplelists.susmangodfrey.com>; Alejandra Salinas (via OAI-NDCA-SDNY list) <oai-ndca-sdny@simplelists.susmangodfrey.com>; #NewYorkTimes-Microsoft-FDBR <newyorktimes-microsoft-fdbr@faegredrinker.com>; NewYorkTimes_Microsoft_OHS@orrick.com
Subject: RE: In re OpenAI

EXTERNAL Email
Alex,

It would be helpful to discuss to better understand your ask here. Are you free at 11 am PT/2 pm ET?

Best,
Vishakha

Vishakha S. Joshi (she/her)
Associate
*Admitted in New York; not admitted in California
vjoshi@mofo.com
T: +1 (858) 720-5100

MORRISON FOERSTER

From: Alex Frawley <AFrawley@susmangodfrey.com>
Sent: Wednesday, April 29, 2026 5:00 AM
To: Joshi, Vishakha S. <VJoshi@mofo.com>; KVP-OAI <kvpoai@keker.com>; OpenAICopyright <OpenAICopyright@mofo.com>; Latham OpenAI Copyright Team <openaicopyrightlitigation.lwteam@lw.com>
Cc: Reaghan E. Braun (via NewsPlaintiffs-Service list) <newsplaintiffs-service@simplelists.susmangodfrey.com>; Alejandra Salinas (via OAI-NDCA-SDNY list) <oai-ndca-sdny@simplelists.susmangodfrey.com>; #NewYorkTimes-Microsoft-FDBR <newyorktimes-microsoft-

fdbr@faegredrinker.com>; NewYorkTimes_Microsoft_OHS@orrick.com
Subject: RE: In re OpenAI

External Email

Hi Vishakha,

We are asking to share News and OpenAI expert reports and any documents and deposition testimony cited in the reports with the limited executives already identified in the protective order. But we can set aside "outside counsel only" material. And to clarify, one News Plaintiff's reports wouldn't be shared with another News Plaintiff's executives. So for example, we are asking to share Times reports and OAI reports with Times executives.

This approach focuses on a defined universe of information the parties have already exchanged with one another, which eliminates any concern about revealing work product. Insofar as you contend the request is overbroad, that is a problem of OpenAI's own making by designating far too many documents as AEO.

Please let me know if you would like to discuss tomorrow and I can make myself available.

Best,
Alex

From: Joshi, Vishakha S. <VJoshi@mofo.com>
Sent: Tuesday, April 28, 2026 9:38 PM
To: Alex Frawley <AFrawley@susmangodfrey.com>; KVP-OAI <kvpoai@keker.com>; OpenAICopyright <OpenAICopyright@mofo.com>; Latham OpenAI Copyright Team <openaicopyrightlitigation.lwteam@lw.com>
Cc: Reaghan E. Braun (via NewsPlaintiffs-Service list) <newsplaintiffs-service@simplelists.susmangodfrey.com>; Alejandra Salinas (via OAI-NDCA-SDNY list) <oai-ndca-sdny@simplelists.susmangodfrey.com>; #NewYorkTimes-Microsoft-FDBR <newyorktimes-microsoft-fdbr@faegredrinker.com>; NewYorkTimes_Microsoft_OHS@orrick.com
Subject: RE: In re OpenAI

EXTERNAL Email
Alex,

We have been diligently reviewing the 52 AEO-designated documents you originally identified, consistent with the protective order's requirement that OpenAI be afforded a "reasonable opportunity to review" before any such materials are shared with designated executives. That review is ongoing, and we expect to provide a response shortly.

Your latest email appears to propose a significant expansion of the scope of materials to be shared—potentially including all expert reports (from either side) and any OpenAI documents or deposition testimony cited therein. Please confirm whether you are now seeking to abandon your original request in favor of this much broader approach, and clarify the precise set of materials you are asking us to review. Based on our preliminary assessment, this would involve a substantially larger volume of documents than the original 52, and would require additional time for us to conduct an appropriate review and raise any necessary objections under the protective order.

Given the volume and the clear terms of the protective order, it would be premature and inappropriate to raise this expanded request with the Court at this time. We are prepared to continue working cooperatively to resolve these issues, but we expect the process set forth in the protective order to be followed.

Best,
Vishakha

Vishakha S. Joshi (she/her)
Associate
*Admitted in New York; not admitted in California
vjoshi@mofo.com
T: +1 (858) 720-5100

MORRISON FOERSTER

From: Alex Frawley <AFrawley@susmangodfrey.com>
Sent: Tuesday, April 28, 2026 10:19 AM
To: Joshi, Vishakha S. <VJoshi@mofo.com>; KVP-OAI <kvpoai@keker.com>; OpenAICopyright <OpenAICopyright@mofo.com>; Latham OpenAI Copyright Team <openaicopyrightlitigation.lwteam@lw.com>
Cc: Reaghan E. Braun (via NewsPlaintiffs-Service list) <newsplaintiffs-service@simplelists.susmangodfrey.com>; Alejandra Salinas (via OAI-NDCA-SDNY list) <oai-ndca-sdny@simplelists.susmangodfrey.com>; #NewYorkTimes-Microsoft-FDBR <newyorktimes-microsoft-fdbr@faegredrinker.com>; NewYorkTimes_Microsoft_OHS@orrick.com
Subject: RE: In re OpenAI

External Email

Vishakha,

It is taking too long for OpenAI to provide the requested confirmation and the delay reveals why this process is not working.

We propose this alternative approach. Please confirm the designated Times / Daily News executives can review any Times / Daily News expert reports as well as any OpenAI expert reports, as well as OpenAI documents and deposition testimony cited in these reports. That review can exclude reports and material marked "Outside Counsel Only."

If OpenAI does not agree we will raise this issue with the Court tomorrow. We can be available to discuss.

Thank you.

Best,
Alex

From: Joshi, Vishakha S. <VJoshi@mofo.com>
Sent: Thursday, April 16, 2026 12:01 AM
To: Alex Frawley <AFrawley@susmangodfrey.com>; KVP-OAI <kvpoai@keker.com>; OpenAICopyright <OpenAICopyright@mofo.com>; Latham OpenAI Copyright Team <openaicopyrightlitigation.lwteam@lw.com>
Cc: Reaghan E. Braun (via NewsPlaintiffs-Service list) <newsplaintiffs-service@simplelists.susmangodfrey.com>; Alejandra Salinas (via OAI-NDCA-SDNY list) <oai-ndca-sdny@simplelists.susmangodfrey.com>; #NewYorkTimes-Microsoft-FDBR <newyorktimes-microsoft-fdbr@faegredrinker.com>; NewYorkTimes_Microsoft_OHS@orrick.com
Subject: RE: In re OpenAI

EXTERNAL Email
Alex,

We are currently reviewing the documents you listed below per Paragraph 24(b) of the Protective Order. Given the volume of documents in your request, we will need until next week to review and discuss with our client. We will follow up with our response.

Best,
Vishakha

Vishakha S. Joshi (she/her)
Associate
*Admitted in New York; not admitted in California
vjoshi@mofo.com
T: +1 (858) 720-5100

MORRISON FOERSTER

From: Alex Frawley <AFrawley@susmangodfrey.com>

Sent: Monday, April 13, 2026 6:55 AM
To: KVP-OAI <kvpoai@keker.com>; OpenAICopyright <OpenAICopyright@mofo.com>; Latham OpenAI Copyright Team <openaicopyrightlitigation.lwteam@lw.com>
Cc: Reaghan E. Braun (via NewsPlaintiffs-Service list) <newsplaintiffs-service@simplelists.susmangodfrey.com>; Alejandra Salinas (via OAI-NDCA-SDNY list) <oai-ndca-sdny@simplelists.susmangodfrey.com>; #NewYorkTimes-Microsoft-FDBR <newyorktimes-microsoft-fdbr@faegredrinker.com>; NewYorkTimes_Microsoft_OHS@orrick.com
Subject: In re OpenAI

External Email

Counsel for OpenAI:

Pursuant to Paragraph 24(b) of the Protective Order, The Times would like to share the below AEO documents with its designated executives. Please let us know by this Friday if OpenAI objects to any of these documents and which ones. To be clear, this is our first request and we may identify additional documents.

Best,
Alex

OPCO_MDL_004775485
OPCO_MDL_004397840
OPCO_MDL_000133637
OPCO_MDL_001806715
OPCO_MDL_001900550
OPCO_MDL_004608715
OPCO_MDL_004625973
OPCO_MDL_004771704
OPCO_MDL_000113921
OPCO_MDL_001900700
OPCO_MDL_004408493
OPCO_MDL_004639557
OPCO_MDL_004776577
OPCO_MDL_000156469
OPCO_MDL_000481178
OPCO_MDL_001820445
OPCO_MDL_004639273
OPCO_MDL_001940102
OPCO_MDL_000220773
OPCO_MDL_000483654
OPCO_MDL_000609714
OPCO_MDL_004639557

OPCO_MDL_004641427
OPCO_MDL_004639273
OPCO_MDL_001006365
OPCO_MDL_00477225
OPCO_MDL_00477225
OPCO_MDL_004836016
OPCO_MDL_004835975
OPCO_MDL_004762805
OPCO_MDL_001686984
OPCO_MDL_000495790
OPCO_MDL_000494603
OPCO_MDL_000482605
OPCO_MDL_000479619
OPCO_MDL_000479741
OPCO_MDL_004625973
OPCO_MDL_001635079
OPCO_MDL_001818474
OPCO_MDL_000481685
OPCO_MDL_001806715
OPCO_MDL_004796351
OPCO_MDL_004734998
OPCO_MDL_004737949
OPCO_MDL_004729613
OPCO_MDL_000222028
OPCO_MDL_001641776
OPCO_MDL_001647071
OPCO_MDL_001647084
OPCO_MDL_001647100
OPCO_MDL_001657555
OPCO_MDL_001937214
OPCO_MDL_004411433
OPCO_MDL_004607126
OPCO_MDL_001697051
OPCO_MDL_000133637
OPCO_MDL_004639273
OPCO_MDL_000000840

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