May 15, 2026

VIA ECF

Hon. Ona T. Wang
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Joint Status Update re News Plaintiffs' Motion to Amend the Protective Order, *In re OpenAI, Inc. Copyright Infringement Litigation*, No. 1:25-md-03143;
This Document Relates To: All Actions

Dear Magistrate Judge Wang:

Pursuant to this Court's Order (ECF 1551), OpenAI and Plaintiffs submit this joint status update regarding News Plaintiffs' motion to amend the protective order (ECF 1518). The parties have resolved their dispute and reached a reciprocal agreement with respect to OpenAI's and News and Class Plaintiffs' opening expert reports. The agreement is memorialized in the attached exhibit. Ex. A.

In consideration of the above, and to the extent not already terminated by the Court, News Plaintiffs withdraw their motion to amend the protective order (ECF 1518).

Sincerely,

MORRISON & FOERSTER LLP	SUSMAN GODFREY LLP	SUSMAN GODFREY LLP
/s/ Caitlin S. Blythe	*/s/ Davida Brook*	*/s/ Justin Nelson*
Counsel for OpenAI Defendants	Counsel for News Plaintiffs	Counsel for Class Plaintiffs