UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: *The New York Times Co. v. Microsoft Corp. et al.*, No. 1:23-cv-11195 *Daily News L.P., et al. v. Microsoft Corp. et al.*, No. 1:24-cv-03285 *The Center for Investigative Reporting, Inc. v. OpenAI, Inc. et al.,* No. 1:24-cv-04872 *Ziff Davis, Inc. v. OpenAI, Inc. et al.,* No. 1:25-cv-04315	1:25-md-03143 (SHS) (OTW) **OPENAI DEFENDANTS' NOTICE OF MOTION FOR JUDGMENT ON THE PLEADINGS** ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the undersigned hereby move this Court on behalf of Defendants OpenAI, Inc., OpenAI LP, OpenAI GP LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Group PBC (collectively "OpenAI" or "OpenAI Defendants") before the Honorable Sidney H. Stein, in Courtroom 23A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order dismissing Plaintiffs The New York Times Co., Daily News Plaintiffs, The Center for Investigative Reporting, and Ziff Davis (collectively, "News Plaintiffs")'s contributory copyright infringement claims with prejudice pursuant to Federal Rule of Civil Procedure 12(c), and granting such further relief as the Court may deem just and proper.

Dated: June 11, 2026

Respectfully submitted,

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* All parties whose electronic signatures are included herein have consented to the filing of this document.