KEKER VAN NEST & PETERS LATHAM & WATKINS LLP MORRISON FOERSTER

June 11, 2026

**VIA ECF**

Hon. Sidney H. Stein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In Re: OpenAI, Inc., Copyright Infringement Litigation*, No. 1:25-md-3143
This Document Relates To: *The New York Times Co. v. Microsoft Corporation, et al.*, No. 23-cv-11195; *Daily News L.P., et al. v. Microsoft Corporation, 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., et al. v. OpenAI, Inc., et al.*, No. 1:25-cv-04315

Dear Judge Stein:

On behalf of the OpenAI Defendants,[1] we write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument be held with respect to OpenAI's concurrently filed Motion for Judgment on the Pleadings.

Respectfully,

| KEKER, VAN NEST & PETERS LLP | LATHAM & WATKINS LLP | MORRISON & FOERSTER LLP |
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| */s/ Nicholas S. Goldberg** | */s/ Sarang V. Damle* | */s/ Joseph C. Gratz** |

cc: All Counsel of Record (via ECF)

[1] OpenAI, Inc., OpenAI LP, OpenAI GP LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Group PBC.

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