UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

OPENAI, INC.,

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This Document Relates To:

No. 1:23-cv-11195 (SHS) (OTW)

25-md-3143 (SHS) (OTW)

THE NEW YORK TIMES' MOTION TO FILE UNDER SEAL

Under paragraph 34 of the Stipulated Protective Order (Dkt. 367), The New York Times ("The Times") respectfully seeks to provisionally file under seal portions of their Response to OpenAI's Motion for Judgment on the Pleadings and Cross-Motion for Leave to Amend being filed today. This response and cross-motion cites and attaches information and documents that have been designated as Protected Discovery Material by Defendants.

The Times does not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. The Times will review these filings, and if necessary, confer about any disagreement.

Dated: June 25, 2026

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