UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGMENT LITIGATION This Document Relates to: THE NEW YORK TIMES COMPANY v. MICROSOFT CORPORATION, et al. No. 23-cv-11195	25-md-3143 (SHS)(OTW) **NOTICE OF CROSS-MOTION TO FILE THIRD AMENDED COMPLAINT**

Please take notice that upon the accompanying Memorandum of Law, the undersigned hereby moves this Court on behalf of Plaintiff The New York Times Company ("The Times"), 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 pursuant to Federal Rule of Civil Procedure 15 granting The Times leave to file its Third Amended Complaint.

Dated: June 25, 2026

/s/ Ian B. Crosby

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