KLARIS

MEMO ENDORSED

6/25/26
This request was made at 5:30 p.m. on Ziff Davis's last day to file their opposition to OpenAI's motion for judgment on the pleadings. Ziff-Davis and CIR shall have until July 2, 2026 in which to file their opposition.
So Ordered
Sidney H. Stein
U.S.D.J.

June 25, 2026

Via ECF
Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: ***In re: OpenAI, Inc., Copyright Infringement Litigation, 1:25-md-03143-SHS-OTW***
This Document Relates To: *Ziff Davis, Inc. et al v. OpenAI, Inc. et al.*, Case No. 25-cv-04315-SHS-OTW ("*Ziff Davis*"), and *The Center for Investigative Reporting, Inc. v. OpenAI, Inc. et al. ("CIR")*, No. 1:24-cv-04872

Dear Judge Stein:

Plaintiffs Ziff Davis, Inc., Ziff Davis, LLC, IGN Entertainment, Inc., and Everyday Health Media, LLC ("Ziff Davis"), together with The Center for Investigative Reporting, Inc. ("Plaintiffs"), respectfully request a 14-day extension of the deadline to file their opposition to OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OPCO LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC's ("Defendants") Motion for Judgment on the Pleadings ("Motion"). *See* Ziff Davis, ECF. No. 543; CIR, ECF No. 606.

Defendants filed their Motion on June 11, 2026. Plaintiffs' deadline to oppose the Motion is currently set for June 25, 2026. Plaintiffs respectfully request that your Honor grant Plaintiffs until July 9, 2026 to file their opposition to the Motion. This is the parties' first request for an extension to respond to the Motion. Defendants consent to this request.

Respectfully submitted,

/s/ Lacy H. Koonce, III

Lacy H. ("Lance") Koonce, III
KLARIS LAW PLLC
161 Water Street
New York, NY 10038
Telephone: (646) 779-4882
lance.koonce@klaris.com

Attorneys for Ziff Davis