UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

OPENAI, INC.,
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This Document Relates to:

Daily News, LP et al. v. Microsoft Corp. et al., No. 1-24-cv-3285

Civil Action No. 1:25-md-03143

NOTICE OF CROSS-MOTION TO FILE FIRST AMENDED COMPLAINT

Please take notice that upon the accompanying Memorandum of Law, the undersigned hereby moves this Court on behalf of Plaintiffs Daily News, LP (the "New York Daily News"); Chicago Tribune Company, LLC, (the "Chicago Tribune"); Orlando Sentinel Communications Company, LLC (the "Orlando Sentinel"); Sun-Sentinel Company, LLC (the "Sun-Sentinel"); San Jose Mercury-News, LLC (the "Mercury News"); DP Media Network, LLC (the "Denver Post"); ORB Publishing, LLC (the "Orange County Register"); and Northwest Publications, LLC (the "Pioneer Press") (collectively, "Daily News Plaintiffs") 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 Daily News Plaintiffs leave to file their First Amended Complaint.

Dated: June 25, 2026

/s/ Steven Lieberman

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