UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC. COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: ZIFF DAVIS, INC. et al. v. OPENAI, INC. et al., No. 1:25-cv-04315	1:25-md-03143 (SHS) (OTW)

NOTICE OF ZIFF DAVIS'S RESPONSE TO OPENAI'S RULE 12(C) MOTION AND CROSS-MOTION TO FILE SECOND AMENDED COMPLAINT

Please take notice that upon the accompanying Memorandum of Law, the undersigned hereby moves the Court on behalf of Plaintiffs Ziff Davis, Inc., Ziff Davis, LLC, IGN Entertainment, Inc., Everyday Health Media, LLC, Mashable, Inc., and CNET Media, Inc. ("Ziff Davis"), 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 denying as moot the Motion for Judgment on the Pleadings submitted by defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI Opco LLC, OpenAI Global LLC, OAI Corporation and OpenAI Holdings, LLC ("OpenAI") (ECF No. 1587), granting Ziff Davis leave to file its Second Amended Complaint pursuant to Federal Rules of Civil Procedure 15 and 41, and making clear that dismissal of Claim 3 [contributory copyright infringement], Claim 8 [federal trademark dilution], and Claim 9 [state-law trademark dilution] as to the stayed portion of the case is without prejudice.

Dated: New York, New York
July 2, 2026

Respectfully submitted,

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