UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:	:	
OPEN AI, INC., COPYRIGHT INFRINGEMENT LITIGATION	:	No. 25-md-3143 (SHS) (OTW)
This Document Relates To:	:	
The New York Times Co. v. Microsoft Corp., et al., No. 23-cv-11195; *Daily News LP et al v. Microsoft Corporation et al*, 4-cv-03285	:	

DECLARATION OF MAILE YEATS-ROWE IN SUPPORT OF OPENAI'S LETTER MOTION TO SEAL

I, Maile Yeats-Rowe, hereby declare as follows:

1. I am Senior Litigation Counsel at OpenAI. I submit this declaration in support of OpenAI's letter motion to seal, filed concurrently herewith. I have personal knowledge of the facts set forth below and if called as a witness, could testify competently thereto.

2. I have been informed and understand that OpenAI moved to seal or redact certain portions of Plaintiff's materials. The information OpenAI seeks to seal has been designated as highly confidential pursuant to the Stipulated Protective Order, ECF 367.

3. Based on my review, the information OpenAI seeks to seal or redact from Plaintiffs' materials comprises highly sensitive and confidential technical and internal business information concerning OpenAI's technology and business strategies that could be unfairly used by its competitors if made public.

4. The portions of Plaintiffs' materials that OpenAI seeks to maintain under seal include: detailed terms and contract prices in OpenAI's agreements with Microsoft and confidential communications reflecting negotiations of same; dashboards detailing OpenAI's

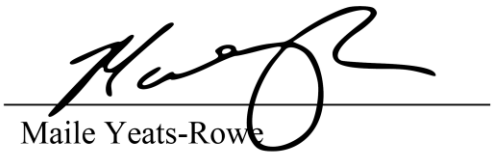
workstreams and milestones; and technical specifics about OpenAI's large language models. Each category constitutes highly sensitive proprietary information that OpenAI generally does not publicly disclose. Moreover, disclosure of such information would give OpenAI's competitors insight into its technical processes, collaborative practices, and business strategies and cause competitive harm to OpenAI in a nascent and highly competitive market.

Description	ECF	Redact or Seal
NYT's Third Amended Complaint	1591-2	Redact (pp. 22, 24–25)
NYT's Redlined Third Amended Complaint	1591-3	Redact (pp. 23, 25)
Exhibit A to NYT's Motion to File Amended Complaint	1591-4	Seal
Exhibit B to the same	1591-5	Seal
Exhibit C to the same	1591-6	Redact (p. 1)
Exhibit D to the same	1591-7	Seal
Exhibit F to the same	1591-9	Seal
Exhibit H to the same	1591-11	Redact (p. 2)
Exhibit I to the same	1591-12	Seal
Exhibit J to the same	1591-13	Seal
Exhibit L to the same	1591-15	Seal
Exhibit M to the same	1591-16	Seal
Exhibit O to the same	1591-18	Seal
Daily News Plaintiffs' First Amended Complaint	1597-1	Redact (pp. 26, 28–29)
Daily News Plaintiffs' Redlined First Amended Complaint (part 2)	1597-2	Redact (pp. 26, 28–29)
Exhibit A to Declaration of Jennifer Maisel	1597-4	Seal
Exhibit B to the same	1597-5	Seal
Exhibit C to the same	1597-6	Redact (p. 1)
Exhibit D (part 1) to the same	1597-7	Seal
Exhibit D (part 2) to the same	1597-8	Seal

Description	ECF	Redact or Seal
Exhibit D (part 3) to the same	1597-9	Seal
Exhibit F to the same	1597-11	Seal
Exhibit H to the same	1597-13	Redact (p. 2)
Exhibit I to the same	1597-14	Seal
Exhibit J to the same	1597-15	Seal
Exhibit L (part 1) to the same	1597-17	Seal
Exhibit L (part 2) to the same	1597-18	Seal
Exhibit L (part 3) to the same	1597-19	Seal
Exhibit O (part 1) to the same	1597-21	Seal
Exhibit O (part 2) to the same	1597-22	Seal
Exhibit O (part 3) to the same	1597-23	Seal

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2nd day of July 2026, in San Francisco, California.



Maile Yeats-Rowe
Senior Litigation Counsel
OpenAI