MEMO ENDORSED

KEKER VAN NEST & PETERS LATHAM & WATKINS LLP MORRISON FOERSTER

July 2, 2026

July 6, 2026
Open A/ Defs document
July 13 to reply.
So Ordered
S. H. Stein
7/6/26.

VIA ECF

Hon. Sidney H. Stein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In Re: OpenAI, Inc., Copyright Infringement Litigation*, No. 1:25-md-3143
This Document Relates To: *Ziff Davis, Inc., et al. v. OpenAI, Inc., et al.*, No. 1:25-cv-04315

Dear Judge Stein:

On behalf of the OpenAI Defendants,[1] we write pursuant to Rule 1.E of Your Honor's Individual Practices to respectfully request a one-week extension of the deadline for OpenAI Defendants to file their reply in support of their Motion for Judgment on the Pleadings ("Motion") against Plaintiffs Ziff Davis, Inc., Ziff Davis, LLC, IGN Entertainment, Inc., Everyday Health Media, LLC, Mashable, Inc., and CNET Media, Inc. (collectively, "Ziff Davis").[2] *See MDL*, ECF No. 1586; *Ziff Davis*, ECF No. 543.

OpenAI Defendants filed the Motion on June 11, 2026. After receiving a one-week extension, Ziff Davis's opposition is due on July 2, 2026. OpenAI Defendants' reply is currently due July 9, 2026. Given the intervening holiday, OpenAI Defendants respectfully request that the Court extend this deadline by one week to July 16, 2026. This is OpenAI Defendants' first request to extend the reply deadline. Ziff Davis consents to this request.

[1] OpenAI, Inc., OpenAI LP, OpenAI GP LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Group PBC.

[2] OpenAI Defendants filed the Motion against The New York Times Co. ("The Times"), Daily News Plaintiffs, The Center for Investigative Reporting ("CIR"), and Ziff Davis.
The Times, Daily News Plaintiffs, and CIR have since agreed to voluntary dismissal of their respective contributory copyright infringement claims with prejudice, mooting the Motion as to those Plaintiffs. *See MDL*, ECF Nos. 1590, 1598, 1606. Counsel for Ziff Davis confirmed today that they intend to oppose the Motion, necessitating this request for adjournment.

Thank you for your consideration of this matter.

Respectfully,

KEKER, VAN NEST & PETERS LLP	LATHAM & WATKINS LLP	MORRISON & FOERSTER LLP
*/s/ Paven Malhotra**	*/s/ Margaret Graham*	*/s/ Caitlin Sinclaire Blythe**
Paven Malhotra (*pro hac vice*)	Margaret Graham	Caitlin Sinclaire Blythe (*pro hac vice*)

cc: All Counsel of Record (via ECF)

* All parties whose electronic signatures are included herein have consented to the filing of this document.