UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: News Cases 1:23-cv-11195-SHS-OTW 1:24-cv-01515-SHS-OTW 1:24-cv-03285-SHS-OTW 1:24-cv-04872-SHS-OTW 1:25-cv-04315-SHS-OTW	25-md-3143 (SHS) (OTW) **[JOINT PROPOSED] ORDER REGARDING BRIEFING SCHEDULE FOR NEWS PLAINTIFFS' MOTION FOR SANCTIONS AGAINST OPENAI**

News Plaintiffs[1] and Defendant OpenAI, Inc. ("OpenAI"), through their respective counsel of record, hereby submit this proposed order regarding a briefing schedule in connection with News Plaintiffs' motion for sanctions against OpenAI, Dkt. 1617-1, 1618.

Whereas, News Plaintiffs filed a motion for leave to file a memorandum of law that exceeds this Court's word limits in support of their motion for sanctions against OpenAI, Inc. ("OpenAI") on July 9, 2026 (Dkt. 1617);

Whereas, the parties have met and conferred regarding a proposed briefing schedule for OpenAI's opposition and News Plaintiffs' reply, as well as respective word limits;

Whereas, the parties agree that OpenAI shall have until August 13, 2026, to file its opposition to News Plaintiffs' motion for sanctions;

[1] News Plaintiffs include The New York Times ("The Times"), Daily News Plaintiffs, the Center for Investigative Reporting ("CIR"), the Intercept, and Ziff Davis Plaintiffs.

Whereas, the parties further agree that OpenAI's memorandum of law in opposition to News Plaintiffs' motion for sanctions shall be subject to the same word limit as the word count used by News Plaintiffs in their opening memorandum of law in support of their motion for sanctions (14,027); and

Whereas, the parties agree that News Plaintiffs shall have until September 10, 2026, to file their reply in further support of the motion for sanctions, with a word limit of 5,400.

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for News Plaintiffs and OpenAI, subject to approval of the Court, that:

1. New Plaintiffs' motion for leave to file a memorandum of law that exceeds this Court's word limits (Dkt. 1617) is GRANTED.
2. News Plaintiffs' motion for sanctions and the accompanying memorandum of law (Dkt. 1617-1; Dkt. 1618) shall be deemed to have been filed on July 9, 2026.
3. OpenAI shall file its opposition to News Plaintiffs' motion for sanctions on or before August 13, 2026, and OpenAI's opposition shall be subject to the same word limit as the word count used by News Plaintiffs in their opening memorandum of law in support of their motion for sanctions (14,027).
4. News Plaintiffs shall file their reply in further support of their motion for sanctions on or before September 10, 2026, and subject to a word limit of 5,400.
5. Except as expressly set forth herein, nothing in this Stipulation modifies any other deadline or order in this action.

[PROPOSED] ORDER
The foregoing Stipulation is SO ORDERED.

Dated: _____, 2026 New York, New York

Dated: July 14, 2026

/s/ Steven Lieberman
Steven Lieberman (SL8687)
Jennifer B. Maisel (5096995)
Robert Parker *(admitted pro hac vice)*
Jenny L. Colgate *(admitted pro hac vice)*
Alexandra Hughes *(admitted pro hac vice)*
Mark Rawls *(admitted pro hac vice)*
Michael H. Jones *(admitted pro hac vice)*
Kristen J. Logan *(admitted pro hac vice)*
Bryan B. Thompson (6004147)
Mary L. Mullins *(pending pro hac vice)*
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Avenue, N.W., Suite 900 East
Washington, DC 20001
Telephone: (202) 783-6040
Facsimile: (202) 783-6031
slieberman@rothwellfigg.com
jmaisel@rothwellfigg.com
rparker@rothwellfigg.com
jcolgate@rothwellfigg.com
ahughes@rothwellfigg.com
mrawls@rothwellfigg.com
mjones@rothwellfigg.com
klogan@rothwellfigg.com
bthompson@rothwellfigg.com
mmullins@rothwellfigg.com

Attorneys for Daily News Plaintiffs

/s/ Ian Crosby
Ian Crosby *(pro hac vice)*
Katherine M. Peaslee *(pro hac vice)*
Susman Godfrey L.L.P.
401 Union Street, Suite 3000
Seattle, WA 98101
Telephone: (206) 516-3880
Facsimile: (206) 516-3883
icrosby@susmangodfrey.com
kpeaslee@susmangodfrey.com

Davida Brook *(pro hac vice)*
Emily K. Cronin (*pro hac vice*)
Adnan Muttalib *(pro hac vice)*
Susman Godfrey L.L.P.
1900 Ave of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150
dbrook@susmangodfrey.com
ecronin@susmangodfrey.com
amuttalib@susmangodfrey.com

Elisha Barron (5036850)
Zachary B. Savage (ZS2668)
Alexander Frawley (5564539)
Eudokia Spanos (5021381)
Susman Godfrey L.L.P.
One Manhattan West
New York, NY 10001
Telephone: (212) 336-8330
Facsimile: (212) 336-8340
ebarron@susmangodfrey.com
zsavage@susmangodfrey.com
afrawley@susmangodrey.com
espanos@susmangodfrey.com

Steven Lieberman (SL8687)

Jennifer B. Maisel (5096995)
Kristen J. Logan *(pro hac vice)*
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Avenue, N.W., Suite 900 East
Washington, DC 20001
Telephone: (202) 783-6040
Facsimile: (202) 783 6031
slieberman@rothwellfigg.com
jmaisel@rothwellfigg.com
klogan@rothwellfigg.com

Attorneys for Plaintiff
The New York Times Company

/s/ Matthew Topic
Jon Loevy (pro hac vice)
Michael Kanovitz (pro hac vice)
Matthew Topic (pro hac vice)
Thomas Kayes (pro hac vice)
Steven Art (pro hac vice)
Kyle Wallenberg (pro hac vice)
Shelley Geiszler (pro hac vice)
LOEVY & LOEVY
311 North Aberdeen, 3rd Floor
Chicago, IL 60607
312-243-5900 (p)
312-243-5902 (f)
jon@loevy.com
mike@loevy.com
matt@loevy.com
kayes@loevy.com
steve@loevy.com
wallenberg@loevy.com
geiszler@loevy.com

Stephen Stich Match (No. 5567854)
Lauren Sonnenberg (pro hac vice)
LOEVY & LOEVY
222 Sutter Street, Suite 600A
San Francisco, CA 94108
(312) 243-5900
match@loevy.com
sonnenberg@loevy.com

/s/ Lacy H. Koonce, III
Lacy H. ("Lance") Koonce, III
Matthew A. Leish
Brendan Kehoe
Lucy Hoffman
Maya Katalan
Klaris Law PLLC
161 Water Street
New York, NY 10038
Telephone: (646) 779-4882
lance.koonce@klaris.com
matthew.leish@klarislaw.com
brendan.kehoe@klarislaw.com
lucy.hoffman@klarislaw.com
maya.katalan@klarislaw.com

Guy Ruttenberg (*pro hac vice*)
Ruttenberg IP Law, A Professional Corporation
1801 Century Park East, Suite 1920
Los Angeles, CA 90067
Telephone: (310) 627-2270
ZD-AICopyright@ruttenbergiplaw.com

Attorneys for Plaintiffs Ziff Davis, Inc., Ziff Davis, LLC, IGN Entertainment, Inc., Everyday Health Media, LLC, Mashable, Inc., and CNET Media, Inc.

Attorneys for Plaintiffs The Center for Investigative Reporting, Inc. and The Intercept Media, Inc.

/s/ Margaret Graham
Andrew M. Gass (pro hac vice)
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Telephone: 415.391.0600
andrew.gass@lw.com

Sarang V. Damle
Luke A. Budiardjo
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Telephone: 212.906.1200
sy.damle@lw.com
luke.budiardjo@lw.com

Elana Nightingale Dawson (pro hac vice)
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Telephone: 202.637.2200
elana.nightingaledawson@lw.com

/s/Luke McCloud
Lisa S. Blatt
Luke McCloud
WILLIAMS & CONNOLLY LLP
680 Maine Avenue SW
Washington, DC 20024
(202) 434-5000
lblatt@wc.com
lmccloud@wc.om

/s/ Joseph C. Gratz
Joseph C. Gratz (pro hac vice)
Tiffany Cheung (pro hac vice)
Caitlin Sinclaire Blythe (pro hac vice)
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Telephone: 415.268.7000
jgratz@mofo.com
tcheung@mofo.com
cblythe@mofo.com

Lily Li (pro hac vice)
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304
Telephone: 650.813.5600
YLi@mofo.com

/s/ Edward A. Bayley
Robert A. Van Nest (pro hac vice)
R. James Slaughter (pro hac vice)
Paven Malhotra
Michelle S. Ybarra (pro hac vice)
Nicholas S. Goldberg (pro hac vice)
KEKER, VAN NEST & PETERS LLP
633 Battery St.
San Francisco, CA 94111
Telephone: 415.391.5400
rvannest@keker.com
rslaughter@keker.com
pmalhotra@keker.com
mybarra@keker.com
ngoldberg@keker.com

Attorneys for OpenAI