UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

OPENAI, INC.,

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This Document Relates To:

No. 1:23-cv-11195 (SHS) (OTW)

No. 1:24-cv-03285 (SHS) (OTW)

25-md-3143 (SHS) (OTW)

NEWS PLANTIFFS' MOTION TO FILE UNDER SEAL

Under paragraph 34 of the Stipulated Protective Order (Dkt. 367), The New York Times and *Daily News* Plaintiffs (collectively, "News Plaintiffs") respectfully seek to provisionally file under seal portions of their Reply in Support of Cross-Motion for Leave to Amend being filed today. This reply discusses information and documents that have been designated as Protected Discovery Material by Defendants.

News Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. News Plaintiffs will review these filings, and if necessary, confer about any disagreement.

Dated: July 16, 2026

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