**UNITED STATES DISTRICT COURT**
**SOUTHERN DISTRICT OF NEW YORK**

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| IN RE: | : | |
| OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION | : | No. 25-md-3143 (SHS) (OTW) |
| This Document Relates To: | : | |
| 1:23-cv-11195-SHS-OTW<br>1:24-cv-01515-SHS-OTW<br>1:24-cv-03285-SHS-OTW<br>1:24-cv-04872-SHS-OTW<br>1:25-cv-04315-SHS-OTW | : | |

**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. In this capacity, I am responsible for, among other things, managing OpenAI's significant litigations. 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 understand that OpenAI moves to seal or redact certain portions of materials submitted with its Brief in Opposition to News Plaintiffs' Motion for Sanctions. 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 comprises highly sensitive and confidential technical and internal business information concerning

OpenAI's technology and business strategies that could be used by its competitors to OpenAI's detriment if made public.

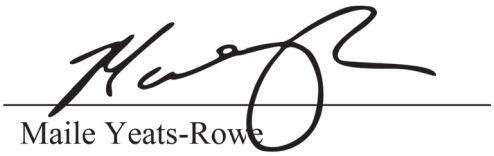
4. The portions of OpenAI's materials that it seeks to maintain under seal include specific and confidential figures related to: cost information, user behavior information, and OpenAI's data handling and storage capabilities. Each category constitutes highly sensitive proprietary information that OpenAI generally does not publicly disclose. Disclosure of such information would give OpenAI's competitors insight into its technical and business processes and cause competitive harm to OpenAI in a nascent and highly competitive market.

5. The following table identifies the materials OpenAI seeks to redact:

| Description | ECF | Redact or Seal |
|---|---|---|
| OpenAI's Opposition Brief | — | Redact portions of pp. 5, 27 |
| Appendix A to the Declaration of Edward A. Bayley | — | Redact portions of p. 11 |
| Exhibit 2 to the Bayley Declaration | MDL 64-4 | Redact portions of p. 2 |
| Exhibit 3 to the Bayley Declaration | MDL 598 | Redact portions of pp. 4, 8, 11, 12, 13, 14, 15 |
| Exhibit 4 to the Bayley Declaration | NYT 425 | Redact portions of pp. 1, 2 |
| Exhibit 6 to the Bayley Declaration | MDL 21-1 | Redact portions of pp. 4, 5, 6, 12, 22, 24, 25 |
| Exhibit 7 to the Bayley Declaration | MDL 864-11 | Redact portions of p. 2 |
| Exhibit 12 to the Bayley Declaration | MDL 599 | Redact portions of pp. 2, 3 |

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

Executed this 13th day of August 2026, in San Francisco, California.



Maile Yeats-Rowe
Senior Litigation Counsel
OpenAI