UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: *The New York Times Co. v. Microsoft Corp. et al.*, No. 1:23-cv-11195 *The Center for Investigative Reporting, Inc. v. OpenAI, Inc. et al.*, No. 1:24-cv-04872 *Daily News L.P., et al. v. Microsoft Corp. et al.*, No. 1:24-cv-03285 *The Intercept Media, Inc. v. OpenAI, Inc. et al.*, No. 1:24-cv-01515 *Ziff Davis, Inc. v. OpenAI, Inc. et al.*, No. 1:25-cv-04315	1:25-md-03143 (SHS) (OTW) **OPENAI DEFENDANTS' NOTICE OF MOTION FOR SUMMARY JUDGMENT** ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Local Rule 56.1 Statement of Undisputed Material Facts, each dated September 4, 2026, as well as the accompanying Declarations of Joseph Gratz, Dr. Chris Callison-Burch, Dr. Taylor Berg-Kirkpatrick, Dr. Barbara Frederiksen-Cross, Dr. Avi Goldfarb, and Dr. Nick Feamster and all exhibits annexed thereto, the undersigned hereby move this Court on behalf of Defendants OpenAI Foundation,[1] OpenAI OpCo, LLC,[2] OpenAI GP, L.L.C., OAI International, Inc.,[3] OpenAI Global, LLC, OAI Corporation,[4] OpenAI Group PBC[5] (collectively "OpenAI" or "OpenAI Defendants") before the Honorable Sidney H. Stein, in Courtroom 23A of the United States District Court for

[1] OpenAI, Inc. changed its name to OpenAI Foundation in October 2025.
[2] OpenAI LP is now known as OpenAI OpCo, LLC.
[3] OpenAI, L.L.C. converted to a corporation named OAI International, Inc. in December 2025.
[4] OAI Corporation, LLC converted from a limited liability company to a corporation named OAI Corporation in September 2023.
[5] OpenAI Holdings, LLC has merged into OpenAI Group PBC and no longer exists as a standalone entity.

the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order granting Defendants' Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56, and for such other relief as the Court deems just and proper.

Dated: September 4, 2026

Respectfully submitted,

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