UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: OpenAI, Inc. Copyright Infringement Litigation This Document Relates To: No. 1:23-cv-08292 No. 1:23-cv-10211 No. 1:23-cv-11195 No. 1:24-cv-03285 No. 1:24-cv-04872	Case No. 1:25-md-3143 (SHS) (OTW)

DECLARATION OF ANNETTE L. HURST IN SUPPORT OF DEFENDANT MICROSOFT'S MOTIONS FOR SUMMARY JUDGMENT

I, Annette L. Hurst, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at Orrick, Herrington & Sutcliffe LLP, located at 405 Howard Street San Francisco, CA 94105, and lead counsel for Microsoft Corporation in these MDL proceedings. I am admitted *pro hac vice* in this matter. I submit this declaration in support of Microsoft's Motion For Summary Judgment In Books Plaintiffs' Consolidated Cases, and Motion For Summary Judgment In News Plaintiffs' Consolidated Cases.

2. As identified during fact discovery in these proceedings, Microsoft retained logs of approximately 1,134,799,717 conversations occurring between July 2023 to September 2024 between users and Microsoft's consumer version of Copilot. Over the course of several months, we negotiated with counsel for News Plaintiffs about how to select relevant material from those logs and how that subset of relevant material would be identified and produced. Pursuant to my overall supervision, Microsoft's

consultants eventually created special metadata tables so that all text-containing fields in the logs of all of the approximately 1.1B conversations could be searched.

3. The agreed-upon keyword terms for searching consisted primarily of the names of News Plaintiffs' publications and URLs containing the domain names of those publications (*e.g.*, nytimes.com). (There were disputes regarding other keywords proposed by News Plaintiffs and they were not used for searching.) Microsoft's consultants searched for the agreed keywords across the metadata tables extracted from the 1.1B logs in order to identify all conversations with any text matching the keyword terms. Any logs that hit on a keyword in any of the text-containing fields were produced. (The text containing fields are described in detail in the Lafferty Declaration.) Based on the foregoing process, Microsoft identified approximately 8.2 million real-world conversations between users and Microsoft's consumer Copilot that hit on the keywords. Microsoft then applied a state-of-the-art privacy redaction tool to remove any potentially personally identifying information from the logs of those conversations, and made the redacted conversations available for analysis by the parties' experts in a secure remote environment.

4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the transcript of the November 18, 2025, deposition of Elbio Abib on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

5. Attached hereto as **Exhibit 1.A** is a true and correct copy of Abib Deposition Exhibit 3, marked at the November 18, 2025, deposition of Elbio Abib taken pursuant to Federal Rule of Civil Procedure 30(b)(6)

6. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the transcript of the December 16, 2025, deposition of Raluca Albu.

7. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the transcript of the February 10, 2026, deposition of Samuel Altman.

8. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the transcript of the January 30, 2026, deposition of Kevin Amer.

9. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the transcript of the March 27, 2026, deposition of Dario Amodei.

10. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of the transcript of the February 19, 2026, deposition of Dan Anderson on behalf of the Daily News, LP; Chicago Tribune Company, LLC; Orlando Sentinel Communications Company, LLC; Sun-Sentinel Company, LLC; San Jose Mercury-News, LLC; DP Media Network, LLC; ORB Publishing, LLC; and Northwest Publications, LLC (collectively, "The Daily News Plaintiffs"), taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

11. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of the transcript of the December 2, 2025, deposition of Julie Anderson.

12. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of the transcript of the March 13, 2026, deposition of Samantha Attwood on behalf of Amazon.com Services LLC, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

13. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts of the transcript of the December 9, 2025, deposition of Columbus Rose, Ltd. by David Baldacci, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

14. Attached hereto as **Exhibit 9.A** is a true and correct copy of Baldacci Deposition Exhibit 14, marked during the January 20, 2026, deposition of David Baldacci taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

15. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts of the transcript of the February 24, 2026, deposition of William Bardeen on behalf of The New York Times Company, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

16. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts of the transcript of the January 26, 2026, deposition of Monika Bauerlein on behalf of The Center for Investigative Reporting, Inc. ("CIR"), taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

17. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts of the transcript of the January 27, 2026, deposition of Monika Bauerlein on behalf of CIR, pursuant to Federal Rule of Civil Procedure 30(b)(6).

18. Attached hereto as **Exhibit 12.A** is a true and correct copy of Bauerlein Deposition Exhibit 47, marked during the January 27, 2026, deposition of Monika Bauerlein taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

19. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts of the transcript of the January 27, 2026, deposition of Monika Bauerlein taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

20. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts of the transcript of the December 16, 2025, deposition of Franklin Taylor Branch.

21. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts of the transcript of the November 25, 2025, deposition of Monica Brewer on behalf of CIR, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

22. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts of the transcript of the January 29, 2026, deposition of Greg Brockman.

23. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts of the transcript of the December 18, 2025, deposition of Madeleine Buckingham on behalf of CIR, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

24. Attached hereto as **Exhibit 17.A** is a true and correct copy of Buckingham Deposition Exhibit 30, marked during the December 18, 2025, deposition of Madeline Buckingham taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

25. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts of the transcript of the December 19, 2025, deposition of Madeleine Buckingham on behalf of CIR, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

26. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts of the transcript of the December 19, 2025, deposition of Madeleine Buckingham taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

27. Attached hereto as **Exhibit 20** is a true and correct copy of excerpts of the transcript of the January 30, 2026, deposition of Mike Burbach.

28. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts of the transcript of the January 22, 2026, deposition of Fabrice Canel on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6),

29. Attached hereto as **Exhibit 21.A** is a true and correct copy of Canel Deposition Exhibit 35, marked during the January 22, 2026, deposition of Fabrice Canel taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

30. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts of the transcript of the February 26, 2026, deposition of Benjamin Chess.

31. Attached hereto as **Exhibit 23** is a true and correct copy of excerpts of the transcript of the February 25, 2026, deposition of Lee Ann Colacioppo on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

32. Attached hereto as **Exhibit 24** is a true and correct copy of excerpts of the transcript of the February 25, 2026, deposition of Lee Ann Colacioppo taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

33. Attached hereto as **Exhibit 25** is a true and correct copy of excerpts of the transcript of the December 9, 2025, deposition of Hieronymus, Inc., by Michael Connelly, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

34. Attached hereto as **Exhibit 25.A** is a true and correct copy of Connelly Deposition Exhibit 6, marked during the December 9, 2025, deposition of Hieronymus, Inc.

35. Attached hereto as **Exhibit 25.B** is a true and correct copy of Connelly Deposition Exhibit 7, marked during the December 9, 2025, deposition of Hieronymus, Inc.

36. Attached hereto as **Exhibit 25.C** is a true and correct copy of Connelly Deposition Exhibit 8, marked during the December 9, 2025, deposition of Hieronymus, Inc.

37. Attached hereto as **Exhibit 26** is a true and correct copy of excerpts of the transcript of the October 21, 2025, deposition of Katherine Cook

38. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts of the transcript of the July 27, 2026, deposition of Sue Cross

39. Attached hereto as **Exhibit 28** is a true and correct copy of excerpts of the transcript of the February 3, 2026, deposition of Matt Dahlin.

40. Attached hereto as **Exhibit 29** is a true and correct copy of excerpts of the transcript of the November 6, 2026, deposition of Louis Deering.

41. Attached hereto as **Exhibit 30** is a true and correct copy of excerpts of the transcript of the November 3, 2025, deposition of Gordon Diggs.

42. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts of the transcript of the February 18, 2026, deposition of Sam Dolnick.

43. Attached hereto as **Exhibit 32** is a true and correct copy of excerpts of the transcript of the March 3, 2026, deposition of Robert Dominguez.

44. Attached hereto as **Exhibit 33** is a true and correct copy of excerpts of the transcript of the February 24, 2026, deposition of Sarah Dussault.

45. Attached hereto as **Exhibit 34** is a true and correct copy of excerpts of the transcript of the October 30, 2025, deposition of Samantha Felix.

46. Attached hereto as **Exhibit 34.A** is a true and correct copy of Times Deposition Exhibit 105, from the October 30, 2025, deposition of Samantha Felix.

47. Attached hereto as **Exhibit 35** is a true and correct copy of excerpts of the transcript of the October 9, 2025, deposition of Johnathan Franzen.

48. **Exhibit 36** intentionally omitted.

49. Attached hereto as **Exhibit 37** is a true and correct copy of excerpts of the transcript of the February 24, 2026, deposition of Ben Gaffney on behalf of OpenAI, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

50. Attached hereto as **Exhibit 37.A** is a true and correct copy of Gaffney Deposition Exhibit 16, marked during the February 24, 2026, deposition of Ben Gaffney, pursuant to Federal Rule of Civil Procedure 30(b)(6).

51. Attached hereto as **Exhibit 38** is a true and correct copy of excerpts of the transcript of the August 20, 2025, deposition of Padma Gaggara on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

52. Attached hereto as **Exhibit 39** is a true and correct copy of excerpts of the transcript of the March 17, 2025, deposition of Christopher Golden.

53. Attached hereto as **Exhibit 40** is a true and correct copy of excerpts of the transcript of the February 10, 2026, deposition of Christopher Golden.

54. Attached hereto as **Exhibit 41** is a true and correct copy of excerpts of the transcript of the July 31, 2026, deposition of Tom Goldstein.

55. Attached hereto as **Exhibit 42** is a true and correct copy of excerpts of the transcript of the November 12, 2025, deposition of Kalani Gordon.

56. Attached hereto as **Exhibit 43** is a true and correct copy of excerpts of the transcript of the January 7, 2026, deposition of Andrew Sean Greer.

57. Attached hereto as **Exhibit 44** is a true and correct copy of excerpts of the transcript of the March 23, 2026, deposition of Belfry Holdings, Inc. by John Grisham, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

58. Attached hereto as **Exhibit 45** is a true and correct copy of excerpts of the transcript of the February 12, 2026, deposition of Rebecca Grossman-Cohen on behalf of The New York Times Company, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

59. Attached hereto as **Exhibit 46** is a true and correct copy of excerpts of the transcript of the February 12, 2026, deposition of Rebecca Grossman-Cohen taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

60. Attached hereto as **Exhibit 47** is a true and correct copy of excerpts of the transcript of the January 23, 2026, deposition of David Gurian-Peck.

61. Attached hereto as **Exhibit 48** is a true and correct copy of excerpts of the transcript of the September 30, 2025, deposition of Chris Hallacy.

62. **Exhibit 49** intentionally omitted.

63. **Exhibit 50** intentionally omitted.

64. Attached hereto as **Exhibit 51** is a true and correct copy of excerpts of the transcript of the October 24, 2025, deposition of Alexandra Hardiman.

65. Attached hereto as **Exhibit 52** is a true and correct copy of excerpts of the transcript of the February 20, 2026, deposition of Todd Harmonson.

66. Attached hereto as **Exhibit 53** is a true and correct copy of excerpts of the transcript of the April 2, 2025, deposition of Peter Hoeschele.

67. Attached hereto as **Exhibit 54** is a true and correct copy of excerpts of the transcript of the January 28, 2026, deposition of Jamie Huynh.

68. Attached hereto as **Exhibit 55** is a true and correct copy of excerpts of the transcript of the January 22, 2026, deposition of David Henry Hwang.

69. Attached hereto as **Exhibit 56** is a true and correct copy of excerpts of the transcript of the November 20, 2025, deposition of Adel Ibrahim on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

70. Attached hereto as **Exhibit 57** is a true and correct copy of excerpts of the transcript of the February 12, 2026, deposition of C.J. Jacobs on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

71. Attached hereto as **Exhibit 57.A** is a true and correct copy of Jacobs Deposition Exhibit 24, marked during the February 12, 2026, deposition of C.J. Jacobs taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

72. Attached hereto as **Exhibit 57.B** is a true and correct copy of Jacobs Deposition Exhibit 31, marked during the February 12, 2026, deposition of C.J. Jacobs taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

73. Attached hereto as **Exhibit 58** is a true and correct copy of excerpts of the transcript of the February 13, 2026 deposition of C.J. Jacobs on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

74. Attached hereto as **Exhibit 59** is a true and correct copy of excerpts of the transcript of the January 16, 2026, deposition of Andrew Julien on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

75. Attached hereto as **Exhibit 60** is a true and correct copy of excerpts of the transcript of the February 26, 2026, deposition of Umair Kazi.

76. Attached hereto as **Exhibit 61** is a true and correct copy of excerpts of the transcript of the December 2, 2025, deposition of Jaron Lanier.

77. Attached hereto as **Exhibit 62** is a true and correct copy of excerpts of the transcript of the August 3, 2026, deposition of Michael Lasinski.

78. Attached hereto as **Exhibit 63** is a true and correct copy of excerpts of the transcript of the February 19, 2026, deposition of Meredith Kopit Levien.

79. Attached hereto as **Exhibit 63.A** is a true and correct copy of Levien Deposition Exhibit 1, from the February 19, 2026, deposition of Meredith Kopit Levien.

80. Attached hereto as **Exhibit 63.B** is a true and correct copy of Levien Deposition Exhibit 3, from the February 19, 2026, deposition of Meredith Kopit Levien.

81. Attached hereto as **Exhibit 64** is a true and correct copy of excerpts of the transcript of the January 27, 2026, deposition of Christine Liang.

82. Attached hereto as **Exhibit 64.A** is a true and correct copy of Liang Deposition Exhibit 14, from the January 27, 2026, deposition of Christine Liang.

83. Attached hereto as **Exhibit 64.B** is a true and correct copy of Liang Deposition Exhibit 16, from the January 27, 2026, deposition of Christine Liang.

84. Attached hereto as **Exhibit 65** is a true and correct copy of excerpts of the transcript of the October 3, 2025, deposition of Chris Loretto.

85. Attached hereto as **Exhibit 66** is a true and correct copy of excerpts of the transcript of the October 3, 2025, deposition of Chris Loretto on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

86. Attached hereto as **Exhibit 67** is a true and correct copy of excerpts of the transcript of the January 9, 2026, deposition of Wayne Lown on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6)

87. Attached hereto as **Exhibit 68** is a true and correct copy of excerpts of the transcript of the January 9, 2026, deposition of Wayne Lown taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

88. Attached hereto as **Exhibit 69** is a true and correct copy of excerpts of the transcript of the July 15, 2026, deposition of James Malackowski.

89. Attached hereto as **Exhibit 70** is a true and correct copy of excerpts of the transcript of the July 16, 2026, deposition of James Malackowski.

90. Attached hereto as **Exhibit 71** is a true and correct copy of excerpts of the transcript of the September 30, 2025, deposition of Sathish Manivannan on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

91. Attached hereto as **Exhibit 71.A** is a true and correct copy of Manivannan Deposition Exhibit 20, marked during the September 30, 2025, deposition of Sathish Manivannan taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

92. Attached hereto as **Exhibit 72** is a true and correct copy of excerpts of the transcript of the February 20, 2026, deposition of Benjamin Mann.

93. Attached hereto as **Exhibit 73** is a true and correct copy of excerpts of the transcript of the February 27, 2026, deposition of Wo & Shade LLC, by George R.R. Martin, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

94. Attached hereto as **Exhibit 74** is a true and correct copy of excerpts of the transcript of the July 14, 2026, deposition of Michael McDonald.

95. Attached hereto as **Exhibit 75** is a true and correct copy of excerpts of the transcript of the November 4, 2025, deposition of Lucas Melton on behalf of Microsoft, taken both pursuant to Federal Rule of Civil Procedure 30(b)(6) and in his individual capacity.

96. Attached hereto as **Exhibit 76** is a true and correct copy of excerpts of the transcript of the February 10, 2026, deposition of Greg Miller on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

97. Attached hereto as **Exhibit 77** is a true and correct copy of excerpts of the transcript of the February 10, 2026, deposition of Greg Miller taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

98. Attached hereto as **Exhibit 78** is a true and correct copy of excerpts of the transcript of the December 17, 2025, deposition of Robyn Morris on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

99. Attached hereto as **Exhibit 79** is a true and correct copy of excerpts of the transcript of the March 25, 2026, deposition of Robyn Morris on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

100. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 79.A**, a true and correct copy of Morris Deposition Exhibit 49, marked during the March 25, 2026, deposition of Robyn Morris taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

101. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 79.B**, a true and correct copy of Morris Deposition Exhibit 52, marked during the March 25, 2026, deposition of Robyn Morris taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

102. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 79.C**, a true and correct copy of Morris Deposition Exhibit 54, marked during the March 25, 2026, deposition of Robyn Morris taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

103. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 79.D**, a true and correct copy of Morris Deposition Exhibit 56, marked during the March 25, 2026, deposition of Robyn Morris taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

104. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 79.E**, a true and correct copy of Morris Deposition Exhibit 58, marked during the March 25, 2026, deposition of Robyn Morris taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

105. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 79.F**, a true and correct copy of Morris Deposition Exhibit 60, marked during the March 25, 2026, deposition of Robyn Morris taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

106. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 79.G**, a true and correct copy of Morris Deposition Exhibit 62, marked during the March 25, 2026, deposition of Robyn Morris taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

107. Attached hereto as **Exhibit 80** is a true and correct copy of excerpts of the transcript of the March 5, 2026, deposition of Mira Murati.

108. Attached hereto as **Exhibit 81** is a true and correct copy of excerpts of the transcript of the February 4, 2026, deposition of Satya Nadella.

109. Attached hereto as **Exhibit 81.A** is a true and correct copy of Nadella Deposition Exhibit 20, marked during the February 4, 2026, deposition of Satya Nadella.

110. Attached hereto as **Exhibit 82** is a true and correct copy of excerpts of the transcript of the July 31, 2026, deposition of Taylor Owen.

111. **Exhibit 83** intentionally omitted.

112. Attached hereto as **Exhibit 84** is a true and correct copy of excerpts of the transcript of the January 22, 2026, deposition of Alex Paino on behalf of OpenAI, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

113. Attached hereto as **Exhibit 84.A** is a true and correct copy of Paino Deposition Exhibit 16, marked during the January 22, 2026, deposition of Alex Paino taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

114. Attached hereto as **Exhibit 84.B** is a true and correct copy of Paino Deposition Exhibit 22, marked during the January 22, 2026, deposition of Alex Paino taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

115. Attached hereto as **Exhibit 85** is a true and correct copy of excerpts of the transcript of the November 18, 2025, deposition of Mikhail Parakhin.

116. Attached hereto as **Exhibit 85.A** is a true and correct copy of Parakhin Deposition Exhibit 25, marked during the November 18, 2025, deposition of Mikhail Parakhin.

117. Attached hereto as **Exhibit 86** is a true and correct copy of excerpts of the transcript of the January 14, 2026, deposition of David Perpich.

118. Attached hereto as **Exhibit 87** is a true and correct copy of excerpts of the transcript of the September 29, 2025, deposition of Jodi Picoult.

119. Attached hereto as **Exhibit 88** is a true and correct copy of excerpts of the transcript of the February 4, 2026, deposition of Frank Pine on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

120. Attached hereto as **Exhibit 89** is a true and correct copy of excerpts of the transcript of the February 5, 2026, deposition of Frank Pine on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

121. Attached hereto as **Exhibit 90** is a true and correct copy of excerpts of the transcript of the February 5, 2026, deposition of Frank Pine taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

122. Attached hereto as **Exhibit 91** is a true and correct copy of excerpts of the transcript of the December 5, 2025, deposition of Hannah Poferl on behalf of The New York Times Company, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

123. Attached hereto as **Exhibit 92** is a true and correct copy of excerpts of the transcript of the December 5, 2025, deposition of Hannah Poferl taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

124. Attached hereto as **Exhibit 93** is a true and correct copy of excerpts of the transcript of the March 19, 2026, deposition of Simone Procas on behalf of The New York Times Company, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

125. Attached hereto as **Exhibit 93.A** is a true and correct copy of Procas Deposition Exhibit 32, marked during the March 19, 2026, deposition of Simone Procas taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

126. Attached hereto as **Exhibit 94** is a true and correct copy of excerpts of the transcript of the January 7, 2026, deposition of Mitch Pugh taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

127. Attached hereto as **Exhibit 95** is a true and correct copy of excerpts of the transcript of the January 7, 2026, deposition of Mitch Pugh on behalf of The Daily News Plaintiffs, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

128. Attached hereto as **Exhibit 96** is a true and correct copy of excerpts of the transcript of the February 24, 2026, deposition of Alec Radford.

129. Attached hereto as **Exhibit 97** is a true and correct copy of excerpts of the transcript of the February 12, 2026, deposition of Mary Rasenberger taken pursuant to Federal Rule of Civil Procedure 30(b)(1).

130. Attached hereto as **Exhibit 98** is a true and correct copy of excerpts of the transcript of the February 13, 2026, deposition of Mary Rasenberger on behalf of Author's Guild, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

131. Attached hereto as **Exhibit 99** is a true and correct copy of excerpts of the transcript of the November 5, 2025, deposition of Jordan Ribas.

132. Attached hereto as **Exhibit 100** is a true and correct copy of excerpts of the transcript of the September 26, 2025, deposition of Joy Robins.

133. Attached hereto as **Exhibit 101** is a true and correct copy of excerpts of the transcript of the February 20, 2026, deposition of Corbin Rossett.

134. Attached hereto as **Exhibit 102** is a true and correct copy of excerpts of the transcript of the February 4, 2026, deposition of Geraldine Russell on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

135. Attached hereto as **Exhibit 103** is a true and correct copy of excerpts of the transcript of the February 27, 2026, deposition of Mark Russinovich.

136. Attached hereto as **Exhibit 104** is a true and correct copy of excerpts of the transcript of the January 29, 2026, deposition of Nick Ryder on behalf of OpenAI, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

137. Attached hereto as **Exhibit 105** is a true and correct copy of excerpts of the transcript of the March 27, 2026, deposition of Courtney Sakre on behalf of Amazon.com Services LLC, taken pursuant to Federal Rule of Civil Procedure 30(b)(6), with the May 22, 2026 Revised Declaration of Courtney Sakre on behalf of Amazon.com Services LLC.

138. Attached hereto as **Exhibit 106** is a true and correct copy of excerpts of the transcript of the December 19, 2025, deposition of Gattopardo LLC, by Stacy Schiff, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

139. Attached hereto as **Exhibit 107** is a true and correct copy of excerpts of the transcript of the July 29, 2026, deposition of Sixiong Shawn Shan.

140. Attached hereto as **Exhibit 108** is a true and correct copy of excerpts of the transcript of the September 26, 2025, deposition of James Shapiro.

141. Attached hereto as **Exhibit 108.A** is a true and correct copy of Shapiro Deposition Exhibit 6, from the September 26, 2025, deposition of James Shapiro.

142. Attached hereto as **Exhibit 109** is a true and correct copy of excerpts of the transcript of the September 17, 2017, deposition of Barrett Sheridan.

143. Attached hereto as **Exhibit 110** is a true and correct copy of excerpts of the transcript of the February 4, 2026, deposition of Varun Shetty on behalf of OpenAI, pursuant to Federal Rule of Civil Procedure 30(b)(6).

144. Attached hereto as **Exhibit 111** is a true and correct copy of excerpts of the transcript of the December 10, 2025, deposition of Ian Sohl.

145. Attached hereto as **Exhibit 111.A** is a true and correct copy of Sohl Deposition Exhibit 420, from the December 10, 2025, deposition of Ian Sohl.

146. Attached hereto as **Exhibit 112** is a true and correct copy of excerpts of the transcript of the January 13, 2026, deposition of Xia Song.

147. Attached hereto as **Exhibit 113** is a true and correct copy of excerpts of the transcript of the January 13, 2026, deposition of Xia Song on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

148. Attached hereto as **Exhibit 114** is a true and correct copy of excerpts of the transcript of the July 30, 2026, deposition of Jessie Stricchiola.

149. Attached hereto as **Exhibit 115** is a true and correct copy of excerpts of the transcript of the February 24, 2026, deposition of Mustafa Suleyman.

150. Attached hereto as **Exhibit 116** is a true and correct copy of excerpts of the transcript of the February 13, 2026, deposition of A.G. Sulzberger

151. Attached hereto as **Exhibit 117** is a true and correct copy of excerpts of the transcript of the March 17, 2026, deposition of Ilya Sutskever.

152. Attached hereto as **Exhibit 117.A** is a true and correct copy of Sutskever Deposition Exhibit 12, from the March 17, 2026, deposition of Ilya Sutskever.

153. Attached hereto as **Exhibit 118** is a true and correct copy of excerpts of the transcript of the January 20, 2026, deposition of Dee Templeton on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

154. Attached hereto as **Exhibit 119** is a true and correct copy of excerpts of the transcript of the January 21, 2026, deposition of Dee Templeton on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

155. Attached hereto as **Exhibit 120** is a true and correct copy of excerpts of the transcript of the February 10, 2026, deposition of Jon Tinter on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

156. Attached hereto as **Exhibit 120.A** is a true and correct copy of Tinter Deposition Exhibit 3, marked during the February 10, 2026, deposition of Jon Tinter taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

157. Attached hereto as **Exhibit 121** is a true and correct copy of excerpts of the transcript of the February 5, 2026, deposition of Helen Toner.

158. **Exhibit 122** intentionally omitted.

159. Attached hereto as **Exhibit 123** is a true and correct copy of excerpts of the transcript of the February 11, 2026, deposition of Michael Turpin.

160. Attached hereto as **Exhibit 124** is a true and correct copy of excerpts of the transcript of the December 9, 2025, deposition of Camilla Velasquez.

161. Attached hereto as **Exhibit 125** is a true and correct copy of excerpts of the transcript of the July 21, 2026, deposition of Emily Wenger.

162. Attached hereto as **Exhibit 126** is a true and correct copy of excerpts of the transcript of the January 22, 2026, deposition of Mike Wetter on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

163. Attached hereto as **Exhibit 127** is a true and correct copy of excerpts of the transcript of the March 25, 2026, deposition of Glen Weyl.

164. Attached hereto as **Exhibit 128** is a true and correct copy of excerpts of the transcript of the February 13, 2026, deposition of Sylvia Wolicki.

165. Attached hereto as **Exhibit 129** is a true and correct copy of excerpts of the transcript of the February 27, 2026, deposition of Hannah Yang on behalf of The New York Times Company, taken pursuant to Federal Rule of Civil Procedure 30(b)(6)

166. Attached hereto as **Exhibit 130** is a true and correct copy of excerpts of the transcript of the November 18, 2025, deposition of Qiming Yuan.

167. Attached hereto as **Exhibit 131** is a true and correct copy of an excerpt of The Authors Guild's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 5 & 9), dated January 16, 2026.

168. Attached hereto as **Exhibit 132** is a true and correct copy of an excerpt of the Chicago Tribune's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

169. Attached hereto as **Exhibit 133** is a true and correct copy of an excerpt of the Chicago Tribune's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

170. Attached hereto as **Exhibit 134** is a true and correct copy of an excerpt of the Chicago Tribune's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 24), dated September 25, 2025.

171. Attached hereto as **Exhibit 135** is a true and correct copy of an excerpt of Plaintiffs' Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 5 & 9), dated January 16, 2026.

172. Attached hereto as **Exhibit 136** is a true and correct copy of an excerpt of CIR's Responses and Objections to Microsoft's Contention Interrogatories (No. 16), dated January 16, 2026.

173. Attached hereto as **Exhibit 137** is a true and correct copy of an excerpt of CIR's Responses and Objections to Microsoft First Set of Requests for Admission (Nos. 49, 52, 53, 55, 57-62, & 69), dated September 29, 2025.

174. Attached hereto as **Exhibit 138** is a true and correct copy of CIR's First Set of Interrogatories to Defendants with Exhibit A, dated October 11, 2024.

175. Attached hereto as **Exhibit 139** is a true and correct copy of an excerpt of the Daily News's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

176. Attached hereto as **Exhibit 140** is a true and correct copy of an excerpt of the Daily News's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

177. Attached hereto as **Exhibit 141** is a true and correct copy of an excerpt of the Daily News's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 24), dated September 25, 2025.

178. Attached hereto as **Exhibit 142** is a true and correct copy of The Daily News Plaintiffs' First Supplemental Responses and Objections to Microsoft's Second Set of Interrogatories (No. 18), dated January 16, 2026.

179. Attached hereto as **Exhibit 143** is a true and correct copy of an excerpt of The Denver Post's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

180. Attached hereto as **Exhibit 144** is a true and correct copy of an excerpt of The Denver Post's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

181. Attached hereto as **Exhibit 145** is a true and correct copy of an excerpt of The Denver Post's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 24), dated September 25, 2025.

182. Attached hereto as **Exhibit 146** is a true and correct copy of an excerpt of Plaintiffs' Responses and Objections to Microsoft's Second Set of Interrogatories (Nos. 5 & 9), dated January 16, 2026.

183. Attached hereto as **Exhibit 147** is a true and correct copy of an excerpt of The Mercury News's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

184. Attached hereto as **Exhibit 148** is a true and correct copy of an excerpt of The Mercury News's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

185. Attached hereto as **Exhibit 149** is a true and correct copy of an excerpt of The Mercury News's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 24), dated September 25, 2025.

186. Attached hereto as **Exhibit 150** is a true and correct copy of Microsoft Responses and Objections to Class Plaintiffs' Fourth Set of Interrogatories, dated January 16, 2026.

187. Attached hereto as **Exhibit 151** is a true and correct copy of Microsoft's First Supplemental Responses and Objections to The New York Times's Interrogatory No. 13, dated January 16, 2026.

188. Attached hereto as **Exhibit 152** is a true and correct copy of Microsoft's Responses and Objections to the Daily News's Fourth Set of Interrogatories, dated January 16, 2026.

189. Attached hereto as **Exhibit 153** is a true and correct copy of Microsoft's Responses and Objections to CIR's Third Set of Interrogatories, dated January 16, 2026.

190. Attached hereto as **Exhibit 154** is a true and correct copy of an excerpt of The New York Times's Supplemental Responses and Objections to Microsoft's Second Set of Interrogatories (No. 15), dated January 16, 2026.

191. Attached hereto as **Exhibit 155** is a true and correct copy of an excerpt of The Orange County Register's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

192. Attached hereto as **Exhibit 156** is a true and correct copy of an excerpt of The Orange County Register's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

193. Attached hereto as **Exhibit 157** is a true and correct copy of an excerpt of The Orange County Register's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 23), dated September 25, 2025.

194. Attached hereto as **Exhibit 158** is a true and correct copy of an excerpt of the Orlando Sentinel's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

195. Attached hereto as **Exhibit 159** is a true and correct copy of an excerpt of the Orlando Sentinel's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

196. Attached hereto as **Exhibit 160** is a true and correct copy of an excerpt of the Orlando Sentinel's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 23), dated September 25, 2025.

197. Attached hereto as **Exhibit 161** is a true and correct copy of an excerpt of OpenAI's Third Supplemental Responses to Tremblay's First Set of Interrogatories (No. 1), dated February 27, 2026.

198. Attached hereto as **Exhibit 162** is a true and correct copy of an excerpt of the Pioneer Press's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

199. Attached hereto as **Exhibit 163** is a true and correct copy of an excerpt of the Pioneer Press's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

200. Attached hereto as **Exhibit 164** is a true and correct copy of an excerpt of the Pioneer Press's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 23), dated September 25, 2025.

201. Attached hereto as **Exhibit 165** is a true and correct copy of an excerpt of the Sun Sentinel's Second Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 6), dated January 16, 2026.

202. Attached hereto as **Exhibit 166** is a true and correct copy of an excerpt of the Sun Sentinel's Fourth Supplemental Responses and Objections to OpenAI's Second Set of Interrogatories (No. 3), dated January 16, 2026.

203. Attached hereto as **Exhibit 167** is a true and correct copy of an excerpt of the Sun Sentinel's Responses and Objections to Microsoft's Fourth Set of Interrogatories (No. 23), dated September 25, 2025.

204. **Exhibit 168** intentionally omitted.

205. **Exhibit 169** intentionally omitted.

206. **Exhibit 170** intentionally omitted.

207. **Exhibit 171** intentionally omitted.

208. **Exhibit 172** intentionally omitted.

209. **Exhibit 173** intentionally omitted.

210. Attached hereto as **Exhibit 174** is a true and correct copy of a document produced in discovery by CIR commencing with the Bates number CIR0000009, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

211. Attached hereto as **Exhibit 175** is a true and correct copy of a document produced in discovery by CIR commencing with the Bates number CIR0002348. cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

212. Attached hereto as **Exhibit 176** is a true and correct copy of a document produced in discovery by CIR commencing with the Bates number CIR0003271, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

213. Attached hereto as **Exhibit 177** is a true and correct copy of a document produced in discovery by CIR commencing with the Bates number CIR0005259, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

214. **Exhibit 178** intentionally omitted.

215. Attached hereto as **Exhibit 179** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of Chris Loretto, Executive Vice President of The Daily News Plaintiffs' owner and / or operator MediaNews Group starting with the Bates number DNP-00632488, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

216. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 180**, a true and correct copy of a document produced in discovery by The Daily News Plaintiffs with the custodian identified as their owner and / or operator MediaNews Group with the Bates number DNP-00636807.

217. **Exhibit 181** intentionally omitted.

218. Attached hereto as **Exhibit 182** is a true and correct copy of a document produced in discovery by David Henry Hwang commencing with the Bates number HWANG000154, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in Books Plaintiffs' Consolidated Cases.

219. Attached hereto as **Exhibit 183** is a true and correct copy of a document produced in discovery by David Henry Hwang commencing with the Bates number HWANG000570, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in Books Plaintiffs' Consolidated Cases.

220. Attached hereto as **Exhibit 184** is a true and correct copy of a document produced in discovery by Microsoft commencing with the Bates number MSFT_AI_MDL_000450937.

221. Attached hereto as **Exhibit 185** is a true and correct copy of a document produced in discovery by Microsoft commencing with the Bates number MSFT_AI_MDL_000950798, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

222. Attached hereto as **Exhibit 186** is a true and correct copy of a document produced in discovery by Microsoft commencing with the Bates number MSFT_AI_MDL_001115484, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

223. **Exhibit 187** intentionally omitted.

224. **Exhibit 188** intentionally omitted.

225. **Exhibit 189** intentionally omitted.

226. **Exhibit 190** intentionally omitted.

227. **Exhibit 191** intentionally omitted.

228. **Exhibit 192** intentionally omitted.

229. Attached hereto as **Exhibit 193** is a true and correct copy of a document produced in discovery by Microsoft commencing with the Bates number MSFT_AI_MDL_001742229, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

230. **Exhibit 194** intentionally omitted.

231. **Exhibit 195** intentionally omitted.

232. Attached hereto as **Exhibit 196** is a true and correct copy of a document produced in discovery by Microsoft commencing with the Bates number MSFT_AI_MDL_000205724, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

233. **Exhibit 197** intentionally omitted.

234. Attached hereto as **Exhibit 198** is a true and correct copy of a document produced in discovery by Microsoft commencing with the Bates number MSFT_AI_MDL_000221643, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

235. Attached hereto as **Exhibit 199** is a true and correct copy of a document produced in discovery by Microsoft commencing with the Bates number MSFT_AI_MDL_002644093, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

236. Attached hereto as **Exhibit 200** is a true and correct copy of a document produced in discovery by James Shapiro commencing with the Bates number NON-FICTION-0108057, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in Books Plaintiffs' Consolidated Cases.

237. **Exhibit 201** intentionally omitted.

238. Attached hereto as **Exhibit 202** is a true and correct copy of a document produced in discovery by The New York Times Company commencing with the Bates number NYT_00692310, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

239. Attached hereto as **Exhibit 203** is a true and correct copy of a document produced in discovery by The New York Times Company commencing with the Bates

number NYT_00701573, cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

240. **Exhibit 204** intentionally omitted.

241. **Exhibit 205** intentionally omitted.

242. Attached hereto as **Exhibit 206** is a true and correct copy of a document produced in discovery by The New York Times Company commencing with the Bates number NYT_01034148. cited in the Declaration of Catherine Tucker in Support of Microsoft's Motion for Summary Judgment in News Plaintiffs' Consolidated Cases.

243. On a thumb drive being contemporaneously delivered to the Court is **Exhibit 207**, a true and correct copy of a document produced in discovery by The New York Times Company with the Bates number NYT_01077210.

244. Attached hereto as **Exhibit 208** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_001644364, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

245. Attached hereto as **Exhibit 209** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_001682605, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

246. Attached hereto as **Exhibit 210** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_001697816, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

247. Attached hereto as **Exhibit 211** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_001876595, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

248. Attached hereto as **Exhibit 212** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_001900461, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

249. Attached hereto as **Exhibit 213** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_001938121, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

250. Attached hereto as **Exhibit 214** is a true and correct copy of a document produced in discovery by OpenAI with the Bates number OPCO_MDL_000245100, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

251. Attached hereto as **Exhibit 215** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_004424223, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

252. **Exhibit 216** intentionally omitted.

253. **Exhibit 217** intentionally omitted.

254. **Exhibit 218** intentionally omitted.

255. **Exhibit 219** intentionally omitted.

256. Attached hereto as **Exhibit 220** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_004661105, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

257. Attached hereto as **Exhibit 221** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_MDL_004661108, cited in the Declaration of John Lafferty in Support of Microsoft's Motions for Summary Judgment.

258. **Exhibit 222** intentionally omitted.

259. **Exhibit 223** intentionally omitted.

260. **Exhibit 224** intentionally omitted.

261. **Exhibit 225** intentionally omitted.

262. Attached hereto as **Exhibit 226** is a true and correct copy of a document produced in discovery by OpenAI commencing with the Bates number OPCO_NDCAL_0000683.

263. Attached hereto as **Exhibit 227** is a true and correct copy of the Declaration of Alex Paino, dated April 13, 2026.

264. Attached hereto as **Exhibit 228** is a true and correct copy of an excerpt of the Opening Expert Report of Emily Bell (retained by The New York Times Company), dated April 24, 2026.

265. Attached hereto as **Exhibit 229** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Emily Bell (retained by The New York Times Company), dated May 29, 2026.

266. Attached hereto as **Exhibit 230** is a true and correct copy of an excerpt of the Corrected Rebuttal Expert Report of Sue Cross (retained by CIR), dated July 23, 2026.

267. Attached hereto as **Exhibit 231** is a true and correct copy of an excerpt of the Opening Expert Report of Dr. Thomas Goldstein (retained by The New York Times Company and The Daily News Plaintiffs), dated April 26, 2026.

268. Attached hereto as **Exhibit 232** is a true and correct copy of an excerpt of the Opening Expert Report of Dr. Thomas Goldstein (retained by The New York Times Company and The Daily News Plaintiffs) Regarding Source Code, dated April 26, 2026.

269. Attached hereto as **Exhibit 233** is a true and correct copy of Goldstein Opening Report Ex. 18 to the Opening Expert Report of Dr. Thomas Goldstein (retained by The New York Times Company and The Daily News Plaintiffs), dated April 26, 2026.

270. Attached hereto as **Exhibit 234** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Dr. Thomas Goldstein (retained by The New York Times Company and The Daily News Plaintiffs), dated May 29, 2026.

271. Attached hereto as **Exhibit 235** is a true and correct copy of an excerpt of the Supplemental Expert Report of Dr. Thomas Goldstein (retained by The New York Times Company and The Daily News Plaintiffs) Regarding Defendants' Output Logs, dated July 14, 2026.

272. Attached hereto as **Exhibit 236** is a true and correct copy of an excerpt of the Corrected Rebuttal Expert Report of Michael Lasinski (retained by Books Plaintiffs), dated May 29, 2026.

273. **Exhibit 237** intentionally omitted.

274. Attached hereto as **Exhibit 238** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Michael McDonald (retained by CIR), dated May 29, 2026.

275. Attached hereto as **Exhibit 239** is a true and correct copy of an excerpt of the Rebuttal Expert Report of James M. Malackowski (retained by The New York Times Company and The Daily News Plaintiffs), dated May 29, 2026.

276. Attached hereto as **Exhibit 240** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Professor Taylor Owen (retained by The Daily News Plaintiffs), dated May 29, 2026.

277. Attached hereto as **Exhibit 241** is a true and correct copy of an excerpt of the Corrected Opening Expert Report of Shawn Shan (retained by Books Plaintiffs), dated April 27, 2026.

278. Attached hereto as **Exhibit 242** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Shawn Shan (retained by Books Plaintiffs), dated May 29, 2026.

279. Attached hereto as **Exhibit 243** is a true and correct copy of an excerpt of the Reply Expert Report of Shawn Shan (retained by Books Plaintiffs), dated June 26, 2026.

280. Attached hereto as **Exhibit 244** is a true and correct copy of an excerpt of the Opening Expert Report of Jessie Stricchiola (retained by The New York Times Company and The Daily News Plaintiffs), dated April 24, 2026.

281. Attached hereto as **Exhibit 245** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Jessie Stricchiola (retained by The New York Times Company and The Daily News Plaintiffs), dated May 29, 2026.

282. Attached hereto as **Exhibit 246** is a true and correct copy of an excerpt of the Opening Expert Report of Emily Wenger (retained by CIR), dated April 24, 2026.

283. Attached hereto as **Exhibit 247** is a true and correct copy of an excerpt of the Reply Expert Report of Emily Wenger (retained by CIR), dated June 26, 2026.

284. Attached hereto as **Exhibit 248** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Emily Wenger (retained by CIR), dated May 29, 2026.

285. Attached hereto as **Exhibit 249** is a true and correct copy of an excerpt of the Opening Expert Report of Dr. Melanie Mitchell (retained by The New York Times Company and The Daily News Plaintiffs), dated April 24, 2026.

286. Attached hereto as **Exhibit 250** is a true and correct copy of an excerpt of the Opening Expert Report of Dr. Oren Etzioni (retained by The New York Times Company and The Daily News Plaintiffs), dated April 24, 2026.

287. Attached hereto as **Exhibit 251** is a true and correct copy of an excerpt of the Opening Expert Report of Ben Zhao (retained by Books Plaintiffs), dated April 24, 2026.

288. Attached hereto as **Exhibit 252** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Ben Zhao (retained by Books Plaintiffs), dated May 29, 2026.

289. Attached hereto as **Exhibit 253** is a true and correct copy of an excerpt of Sylvia Day LLC's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

290. Attached hereto as **Exhibit 254** is a true and correct copy of an excerpt of David Henry Hwang's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

291. Attached hereto as **Exhibit 255** is a true and correct copy of an excerpt of Hieronymus, Inc.'s Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

292. Attached hereto as **Exhibit 256** is a true and correct copy of an excerpt of Andrew Sean Greer's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

293. Attached hereto as **Exhibit 257** is a true and correct copy of an excerpt of Christopher Golden's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

294. Attached hereto as **Exhibit 258** is a true and correct copy of an excerpt of Gattopardo LLC's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

295. Attached hereto as **Exhibit 259** is a true and correct copy of an excerpt of Daring Greatly Corporation's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

296. Attached hereto as **Exhibit 260** is a true and correct copy of an excerpt of Belfry Holdings, Inc.'s Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

297. Attached hereto as **Exhibit 261** is a true and correct copy of an excerpt of Wo & Shade LLC's Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

298. Attached hereto as **Exhibit 262** is a true and correct copy of The New York Times Company's Q2 2026 Earnings Report, dated August 5, 2026, downloaded

from The New York Times Company's Investor Relations Reports and Filings repository at: https://www.nytco.com/investors/reports-and-filings/.

299. Attached hereto as **Exhibit 263** is a true and correct copy of The New York Times Company's 2019 United States Securities and Exchange Commission Form 10-K, dated February 27, 2020, downloaded from The New York Times Company's Investor Relations Reports and Filings repository at: https://www.nytco.com/investors/reports-and-filings/.

300. Attached hereto as **Exhibit 264** is a true and correct copy of The New York Times Company's 2020 United States Securities and Exchange Commission Form 10-K, dated February 25, 2021, downloaded from The New York Times Company's Investor Relations Reports and Filings repository at: https://www.nytco.com/investors/reports-and-filings/.

301. Attached hereto as **Exhibit 265** is a true and correct copy of The New York Times Company's 2021 United States Securities and Exchange Commission Form 10-K, dated February 23, 2022, downloaded from The New York Times Company's Investor Relations Reports and Filings repository at: https://www.nytco.com/investors/reports-and-filings/.

302. Attached hereto as **Exhibit 266** is a true and correct copy of Levien Deposition Exhibit 3, from the February 19, 2026, deposition of Meredith Kopit Levien.

303. Attached hereto as **Exhibit 267** is a true and correct copy of a document produced in discovery by CIR commencing with the Bates number CIR0002550.

304. Attached hereto as **Exhibit 268** is a true and correct copy of a document produced in discovery by CIR commencing with the Bates number CIR0053828.

305. Attached hereto as **Exhibit 269** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00000279.

306. Attached hereto as **Exhibit 270** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00000615.

307. Attached hereto as **Exhibit 271** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00000945.

308. Attached hereto as **Exhibit 272** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00001523.

309. Attached hereto as **Exhibit 273** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00001769.

310. Attached hereto as **Exhibit 274** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00002088.

311. Attached hereto as **Exhibit 275** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00036164.

312. Attached hereto as **Exhibit 276** is a true and correct copy of a document produced in discovery by The Daily News Plaintiffs from the custodial files of their owner and / or operator MediaNews Group commencing with the Bates number DNP-00348298.

313. Attached hereto as **Exhibit 277** is a true and correct copy of a document produced in discovery by The New York Times Company commencing with the Bates number NYT_00146884.

314. Attached hereto as **Exhibit 278** is a true and correct copy of a document produced in discovery by The New York Times Company commencing with the Bates number NYT_00274129.

315. Attached hereto as **Exhibit 279** is a true and correct copy of excerpts of the transcript of the February 27, 2026, deposition of Madeleine Buckingham on behalf of CIR, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

316. Attached hereto as **Exhibit 280** is a true and correct copy of an excerpt of the Rebuttal Expert Report of Mark Seeley (retained by Books Plaintiffs), dated May 29, 2026.

317. Attached hereto as **Exhibit 281** is a true and correct copy of excerpts of the transcript of the July 17, 2026, deposition of Emily Bell.

318. **Exhibit 282** intentionally omitted.

319. Attached hereto as **Exhibit 283** is a true and correct copy of an excerpt of the Opening Expert Report of James M. Malackowski (retained by The New York Times Company and The Daily News Plaintiffs), dated April 24, 2026.

320. **Exhibit 284** intentionally omitted.

321. **Exhibit 285** intentionally omitted.

322. **Exhibit 286** intentionally omitted.

323. **Exhibit 287** intentionally omitted.

324. **Exhibit 288** intentionally omitted.

325. Attached hereto as **Exhibit 289** is a true and correct copy of excerpts of the transcript of the December 17, 2025, deposition of Robyn Morris.

326. **Exhibit 290** intentionally omitted.

327. Attached hereto as **Exhibit 291** is a true and correct copy of a document produced in discovery by The New York Times Company commencing with the Bates number NYT_01019612.

328. Attached hereto as **Exhibit 292** is a true and correct copy of excerpts of the transcript of the November 5, 2025, deposition of Khary Brown.

329. Attached hereto as **Exhibit 293** is a true and correct copy of an excerpt of Columbus Rose, Ltd.'s Supplemental Responses and Objections to Microsoft's First Set of Interrogatories (Nos. 12 & 13), dated November 21, 2025.

330. Attached hereto as **Exhibit 294** is a true and correct copy of excerpts of the transcript of the February 19, 2026, deposition of Sarah Bird on behalf of Microsoft, taken pursuant to Federal Rule of Civil Procedure 30(b)(6).

331. Attached hereto as **Exhibit 295** is a true and correct copy of excerpts of the transcript of the March 3, 2025, deposition of Benjamin Mann.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 4th day of September, 2026 at San Francisco, California.

/s/ Annette L. Hurst
Annette L. Hurst