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September 17, 2026

VIA ECF

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 1007

Re: *In re OpenAI Inc., Copyright Infringement Litigation*, 25-md-3143

Dear: Judge Stein:

I write on behalf of Plaintiffs The New York Times Company ("The Times"), the Daily News Plaintiffs, The Center for Investigative Reporting, Inc., The Intercept Media, Inc., and the Ziff Davis Plaintiffs (together, "News Plaintiffs"). We attach to this letter a public, redacted version of News Plaintiffs' Rule 56.1 Statement In Support of News Plaintiffs' Motion for Summary Judgment (Dkt. 1742). Pursuant to paragraph 9.c of the Court's September 3, 2026 Stipulated Omnibus Sealing Order (Dkt. 1685), News Plaintiffs have removed redactions for material that no party or third-party has sought to seal. News Plaintiffs have also made corrections that are identified in News Plaintiffs' forthcoming Notice of Errata.

Sincerely,

/s/ Davida Brook
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