UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: News Cases 1:23-cv-11195-SHS-OTW 1:24-cv-01515-SHS-OTW 1:24-cv-03285-SHS-OTW 1:24-cv-04872-SHS-OTW 1:25-cv-04315-SHS-OTW	25-md-3143 (SHS) (OTW) JURY TRIAL DEMANDED

CORRECTED DECLARATION OF DAVIDA BROOK IN SUPPORT NEWS PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

I, Davida Brook, hereby declare as follows:

1. I am a Partner at Susman Godfrey L.L.P. located at 1900 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067, which represents Plaintiff The New York Times Company ("The Times") in this case.

2. I make this declaration in further support of News Plaintiffs' Motion for Summary Judgment.

3. Attached as Exhibit 1 is a true and correct copy of The New York Times SEC Form 10-K for the fiscal year ended December 31, 2025.

4. Attached as Exhibit 2 is a true and correct copy of an article titled, “2026 State of The Times Remarks,” published by The New York Times Company on March 12, 2026 [https://www.nytco.com/2026-state-of-the-times-remarks/].

5. Attached as Exhibit 3 is a true and correct copy of the deposition transcript of A.G. Sulzberger, in the above-captioned matter, dated February 13, 2026.

6. Attached as Exhibit 4 is a true and correct copy of the deposition transcript of Sam Dolnick, in the above-captioned matter, dated February 18, 2026.

7. Attached as Exhibit 5 is a true and correct copy of an article titled, "How to play the long game, with New York Times CEO Meredith Kopit Levien," by Nilay Patel, The Verge, on March 23, 2023 [https://www.theverge.com/23651323/new-york-times-ceo-meredith-kopit-levien-wordle-the-athletic-sports-cooking].

8. Attached as Exhibit 6 is a true and correct copy of the produced document at Bates NYT_00873667, which is the minutes for The New York Times Company Investor Day meeting, held on June 13, 2022.

9. Attached as Exhibit 7 is a true and correct copy of an article titled, “Ethical Journalism: A Handbook of Values and Practices for the News and Opinion Departments," published by The New York Times on March 26, 2025 [https://www.nytimes.com/editorial-standards/ethical-journalism.html].

10. Attached as Exhibit 8 is a true and correct copy of the deposition transcript of William Bardeen as the corporate representative for The New York Times, in the above-captioned matter, dated February 24, 2026.

11. Attached as Exhibit 9 is a true and correct copy of Ian Sohl Deposition Exhibit 410.

12. Attached as Exhibit 10 is a true and correct copy of the deposition transcript of Dan Anderson as corporate representative for the Daily News Plaintiffs, in the above-captioned matter, dated February 19, 2026.

13. Attached as Exhibit 11 is a true and correct copy of an article titled, "Pulitzer for News," New York Daily News, on April 17, 2007 [https://www.nydailynews.com/2007/04/17/pulitzer-for-news/].

14. Attached as Exhibit 12 is a true and correct copy of an article titled, “The New York Daily News and the History of Conservative Media,” Pressman, M., Cambridge University Press, October 2, 2021, [https://www.cambridge.org/core/journals/modern-american-history/article/new-york-daily-news-and-the-history-ofconservative-media/B3D4FD2CF08C020C4CDAC948786116B2].

15. Attached as Exhibit 13 is a true and correct copy of a capture of the webpage available at https://www.ocregister.com/about-us/.

16. Attached as Exhibit 14 is a true and correct copy of a capture of the webpage available at https://www.chicagotribune.com/about/.

17. Attached as Exhibit 15 is a true and correct copy of a capture of the webpage available at https://www.sun-sentinel.com/about-us/.

18. Attached as Exhibit 16 is a true and correct copy of the 30(b)(6) deposition transcript of Lee Ann Colacioppo taken on February 25, 2026.

19. Attached as Exhibit 17 is a true and correct copy of the 30(b)(6) deposition transcript of Frank Pine taken on February 4, 2026.

20. Attached as Exhibit 18 is a true and correct copy of the deposition transcript of Mike Burbach taken January 30, 2026.

21. Attached as Exhibit 19 is a true and correct copy of the 30(b)(1) deposition transcript of Mitch Pugh taken on January 7, 2026.

22. Attached as Exhibit 20 is a true and correct copy of the deposition transcript of Julie Anderson taken on December 2, 2025.

23. Attached as Exhibit 21 is a true and correct copy of the 30(b)(6) deposition transcript of Mitch Pugh taken on January 7, 2026.

24. Attached as Exhibit 22 is a true and correct copy of the 30(b)(6) deposition transcript of Andrew Julien taken on January 16, 2026.

25. Attached as Exhibit 23 is a true and correct copy of a capture of the webpage available at https://www.nydailynews.com/about-us/.

26. Attached as Exhibit 24 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/2017.

27. Attached as Exhibit 25 is a true and correct copy of a Pugh Deposition Exhibit 2.

28. Attached as Exhibit 26 is a true and correct copy of a capture of the webpage available at https://www.chicagotribune.com/2026/05/04/chicago-tribune-pulitzer-prize/.

29. Attached as Exhibit 27 is a true and correct copy of a capture of the webpage available at https://www.orlandosentinel.com/2026/06/06/150-years-in-the-making-this-is-the-story-of-the-orlando-sentinel/.

30. Attached as Exhibit 28 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/1988.

31. Attached as Exhibit 29 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/2000.

32. Attached as Exhibit 30 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/finalists/staff-192.

33. Attached as Exhibit 31 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/2019.

34. Attached as Exhibit 32 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/2013.

35. Attached as Exhibit 33 is a true and correct copy of a capture of the webpage available at https://www.mercurynews.com/2014/06/16/herhold-the-history-of-the-mercury-news-downtown/.

36. Attached as Exhibit 34 is a true and correct copy of a capture of the webpage available at https://network.thetrustproject.org/partner/the-mercury-news.

37. Attached as Exhibit 35 is a true and correct copy of a capture of the webpage available at https://www.mercurynews.com/.

38. Attached as Exhibit 36 is a true and correct copy of a capture of the webpage available at https://www.orlandosentinel.com/about/.

39. Attached as Exhibit 37 is a true and correct copy of a capture of the webpage available at https://historysanjose.org/plan-your-visit/exhibits-activities/online-exhibits/750-ridder-park-drive-documenting-the-former-headquarters-of-the-mercury-news/.

40. Attached as Exhibit 38 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/1986.

41. Attached as Exhibit 39 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/1990.

42. Attached as Exhibit 40 is a true and correct copy of a capture of the webpage available at https://www.denverpost.com/2017/10/15/denver-post-at-125-a-timeline/.

43. Attached as Exhibit 41 is a true and correct copy of a capture of the webpage available at https://www.denverpost.com.

44. Attached as Exhibit 42 is a true and correct copy of a capture of the webpage available at https://www.ocregister.com/2006/09/11/register-history/.

45. Attached as Exhibit 43 is a true and correct copy of a capture of the webpage available at https://www.ocregister.com.

46. Attached as Exhibit 44 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/finalists/bernard-wolfson-william-heisel-and-chris-knap.

47. Attached as Exhibit 45 is a true and correct copy of a capture of the webpage available at https://www.twincities.com/2024/04/28/minnesotas-first-newspaper-is-175-years-old/.

48. Attached as Exhibit 46 is a true and correct copy of a capture of the webpage available at https://www.twincities.com/.

49. Attached as Exhibit 47 is a true and correct copy of Ziff Davis, Inc. SEC Form 10-K for the fiscal year ended December 31, 2025.

50. Attached as Exhibit 48 is a true and correct copy of the produced document bearing Bates ZD0534639.

51. Attached as Exhibit 49 is a true and correct copy of the 30(b)(6) deposition transcript of Karen Oh taken February 24, 2026.

52. Attached as Exhibit 50 is a true and correct copy of the produced document bearing Bates ZD0546514.

53. Attached as Exhibit 51 is a true and correct copy of the produced document bearing Bates ZD0044231.

54. Attached as Exhibit 52 is a true and correct copy of the produced document bearing Bates ZD0668066.

55. Attached as Exhibit 53 is a true and correct copy of the produced document bearing Bates ZD0668067.

56. Attached as Exhibit 54 is a true and correct copy of the produced document bearing Bates ZD0488725.

57. Attached as Exhibit 55 is a true and correct copy of an article titled, "The BBC's Editorial Standards," BBC, [https://www.bbc.co.uk/editorialguidelines/guidelines/editorial-standards/].

58. Attached as Exhibit 56 is a true and correct copy of an article titled, NPR. These Are the Standards of Our Journalism. February 11, 2019. [https://www.npr.org/ethics].

59. Attached as Exhibit 57 is a true and correct copy of the 30(b)(6) deposition transcript of Frank Pine taken on February 5, 2026.

60. Attached as Exhibit 58 is a true and correct copy of the produced document titled, "Code of Editorial Principles," MediaNews Group | Tribune Publishing (DNP-00543937 - DNP-00543943).

61. Attached as Exhibit 59 is a true and correct copy of the produced document titled, "Ethics & Professional Standards Guidelines," Southern California News Group (DNP-00543944 - DNP-00543954).

62. Attached as Exhibit 60 is a true and correct copy of the produced document bearing Bates DNP-00543955.

63. Attached as Exhibit 61 is a true and correct copy of the produced document bearing Bates DNP-00543959.

64. Attached as Exhibit 62 is a true and correct copy of the produced document bearing Bates DNP-00543968.

65. Attached as Exhibit 63 is a true and correct copy of the produced document bearing Bates DNP-00543979.

66. Attached as Exhibit 64 is a true and correct copy of The Chicago Tribune's Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 24-25).

67. Attached as Exhibit 65 is a true and correct copy The New York Daily News' Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 24-25).

68. Attached as Exhibit 66 is a true and correct copy The Mercury News' Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 24-25).

69. Attached as Exhibit 67 is a true and correct copy The Denver Post's Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 24-25).

70. Attached as Exhibit 68 is a true and correct copy The Orlando Sentinel's Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 23-24).

71. Attached as Exhibit 69 is a true and correct copy The Sun Sentinel's Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 23-24).

72. Attached as Exhibit 70 is a true and correct copy The Pioneer Press' Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 23-24).

73. Attached as Exhibit 71 is a true and correct copy The Orange County Register's Responses to Microsoft's Fourth Set of Interrogatories, September 25, 2025 (Nos. 23-24).

74. Attached as Exhibit 72 is a true and correct copy of the 30(b)(6) deposition transcript of Chandra Jacobs taken February 12, 2026.

75. Attached as Exhibit 73 is a true and correct copy of the 30(b)(6) deposition transcript of Chandra Jacobs taken February 13, 2026.

76. Attached as Exhibit 74 is a true and correct copy of The Chicago Tribune's Fourth Supplemental Responses to OpenAI's Second Set of Interrogatories, January 16, 2026.

77. Attached as Exhibit 75 is a true and correct copy of The New York Daily News Fourth Supplemental Responses to OpenAI's Second Set of Interrogatories, January 16, 2026.

78. Attached as Exhibit 76 is a true and correct copy of The Orlando Sentinel Responses to OpenAI Second Set of Interrogatories, January 16, 2026.

79. Attached as Exhibit 77 is a true and correct copy of The Sun Sentinel Fourth Supplemental Responses to OpenAI's Second Set of Interrogatories, January 16, 2026.

80. Attached as Exhibit 78 is a true and correct copy of The Denver Post Fifth Supplemental Responses to OpenAI's Second Set of Interrogatories, February 27, 2026.

81. Attached as Exhibit 79 is a true and correct copy of The Pioneer Press's Fifth Supplemental Responses to OpenAI Second Set of Interrogatories, February 27, 2026.

82. Attached as Exhibit 80 is a true and correct copy of The Orange County Register Fifth Supplemental Responses to OpenAI's Second Set of Interrogatories, February 27, 2026.

83. Attached as Exhibit 81 is a true and correct copy of The Mercury News Fifth Supplemental Responses to OpenAI's Second Set of Interrogatories, February 27, 2026.

84. Attached as Exhibit 82 is a true and correct copy of Tucker's Opening Expert Report.

85. Attached as Exhibit 83 is a true and correct copy of the 30(b)(6) deposition transcript of Hannah Poferl taken, December 5, 2025.

86. Attached as Exhibit 84 is a true and correct copy of the produced document bearing Bates ZD0531000.

87. Attached as Exhibit 85 is a true and correct copy of the 30(b)(6) deposition transcript of Joey Fortuna taken February 25, 2026.

88. Attached as Exhibit 86 is a true and correct copy of the produced document bearing Bates DNP-00632487.

89. Attached as Exhibit 87 is a true and correct copy of the deposition transcript of Ben Frumin taken December 17, 2025.

90. Attached as Exhibit 88 is a true and correct copy of the 30(b)(6) deposition transcript of Adel Ibrahim taken November 20, 2025.

91. Attached as Exhibit 89 is a true and correct copy of the deposition transcript of Louis Deering taken November 6, 2025.

92. Attached as Exhibit 90 is a true and correct copy of the 30(b)(6) deposition transcript of Chris Loretto taken October 3, 2025.

93. Attached as Exhibit 91 is a true and correct copy of Dan Anderson's deposition Exhibit 11 (DNP-00396431 - DNP-00396453).

94. Attached as Exhibit 92 is a true and correct copy of the 30(b)(1) deposition transcript of Adel Ibrahim taken November 20, 2025.

95. Attached as Exhibit 93 is a true and correct copy of the produced document bearing Bates DNP-00477515.

96. Attached as Exhibit 94 is a true and correct copy of the produced document bearing Bates DNP-00393598.

97. Attached as Exhibit 95 is a true and correct copy of the produced document bearing Bates DNP-00533731.

98. Attached as Exhibit 96 is a true and correct copy of the produced document bearing Bates DNP-00651696.

99. Attached as Exhibit 97 is a true and correct copy of the 30(b)(6) deposition transcript of Bret Richter.

100. Attached as Exhibit 98 is a true and correct copy of The New York Times SEC Form 10-K for the fiscal year ended Dec. 31, 2023.

101. Attached as Exhibit 99 is a true and correct copy of The New York Times SEC Form 10-K for the fiscal year ended Dec. 31, 2022.

102. Attached as Exhibit 100 is a true and correct copy of the produced document bearing Bates NYT_00820234.

103. Attached as Exhibit 101 is a true and correct copy of the produced document bearing Bates NYT_00820246.

104. Attached as Exhibit 102 is a true and correct copy of the produced document bearing Bates NYT_00820258.

105. Attached as Exhibit 103 is a true and correct copy of The New York Times SEC Form 10-K for the fiscal year ended Dec. 31, 2024.

106. Attached as Exhibit 104 is a true and correct copy of the produced document bearing Bates NYT_00755698.

107. Attached as Exhibit 105 is a true and correct copy of the produced document bearing Bates NYT_00755718.

108. Attached as Exhibit 106 is a true and correct copy of the produced document bearing Bates NYT_00755635.

109. Attached as Exhibit 107 is a true and correct copy of the produced document bearing Bates NYT_00146736.

110. Attached as Exhibit 108 is a true and correct copy of the deposition transcript of Denise DiPersio taken February 25, 2026.

111. Attached as Exhibit 109 is a true and correct copy of the 30(b)(6) deposition transcript of Adam Doree taken February 20, 2026.

112. Attached as Exhibit 110 is a true and correct copy of the produced document bearing Bates ZD0323073.

113. Attached as Exhibit 111 is a true and correct copy of the produced document bearing Bates ZD0489061.

114. Attached as Exhibit 112 is a true and correct copy of the produced document bearing Bates ZD0355406.

115. Attached as Exhibit 113 is a true and correct copy of the produced document bearing Bates ZD0486818.

116. Attached as Exhibit 114 is a true and correct copy of the produced document bearing Bates ZD0492441.

117. Attached as Exhibit 115 is a true and correct copy of the produced document bearing Bates ZD0441424.

118. Attached as Exhibit 116 is a true and correct copy of the produced document bearing Bates ZD0572418.

119. Attached as Exhibit 117 is a true and correct copy of the produced document bearing Bates ZD0373029.

120. Attached as Exhibit 118 is a true and correct copy of the produced document bearing Bates ZD0493247.

121. Attached as Exhibit 119 is a true and correct copy of the produced document bearing Bates ZD0488981.

122. Attached as Exhibit 120 is a true and correct copy of the produced document bearing Bates ZD0370635.

123. Attached as Exhibit 121 is a true and correct copy of the produced document bearing Bates ZD0492754.

124. Attached as Exhibit 122 is a true and correct copy of the produced document bearing Bates ZD0575952.

125. Attached as Exhibit 123 is a true and correct copy of the produced document bearing Bates ZD0323404.

126. Attached as Exhibit 124 is a true and correct copy of the produced document bearing Bates ZD0487609.

127. Attached as Exhibit 125 is a true and correct copy of the produced document bearing Bates ZD0492278.

128. Attached as Exhibit 126 is a true and correct copy of the produced document bearing Bates ZD0447957.

129. Attached as Exhibit 127 is a true and correct copy of Mohan Rao's Rebuttal Report.

130. Attached as Exhibit 128 is a true and correct copy of Laura Stamm's NYT-DNP Rebuttal Report

131. Attached as Exhibit 129 is a true and correct copy of Laura Stamm's Ziff Davis Rebuttal Report.

132. Attached as Exhibit 130 is a true and correct copy of the deposition transcript of Greg Brockman taken January 29, 2026.

133. Attached as Exhibit 131 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004776577.

134. Attached as Exhibit 132 is a true and correct copy of deposition transcript of Michelle B. Fradin.

135. Attached as Exhibit 133 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004639271.

136. Attached as Exhibit 134 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000004692.

137. Attached as Exhibit 135 is a true and correct copy of the deposition transcript of Ilya Sutskever.

138. Attached as Exhibit 136 is a true and correct copy of the 30(b)(6) deposition transcript of Varun Shetty taken February 4, 2026.

139. Attached as Exhibit 137 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000678077.

140. Attached as Exhibit 138 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004408493.

141. Attached as Exhibit 139 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004621506.

142. Attached as Exhibit 140 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001639938.

143. Attached as Exhibit 141 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001827703.

144. Attached as Exhibit 142 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001697575.

145. Attached as Exhibit 143 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004597103.

146. Attached as Exhibit 144 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590266.

147. Attached as Exhibit 145 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004593243.

148. Attached as Exhibit 146 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590278.

149. Attached as Exhibit 147 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590330.

150. Attached as Exhibit 148 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590293.

151. Attached as Exhibit 149 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590340.

152. Attached as Exhibit 150 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590356.

153. Attached as Exhibit 151 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590440.

154. Attached as Exhibit 152 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004596337.

155. Attached as Exhibit 153 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591305.

156. Attached as Exhibit 154 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004600925.

157. Attached as Exhibit 155 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590656.

158. Attached as Exhibit 156 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590223.

159. Attached as Exhibit 157 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004595016.

160. Attached as Exhibit 158 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004595013.

161. Attached as Exhibit 159 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590323.

162. Attached as Exhibit 160 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590516.

163. Attached as Exhibit 161 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590504.

164. Attached as Exhibit 162 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590667.

165. Attached as Exhibit 163 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590684.

166. Attached as Exhibit 164 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590701.

167. Attached as Exhibit 165 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740479.

168. Attached as Exhibit 166 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590367.

169. Attached as Exhibit 167 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591249.

170. Attached as Exhibit 168 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591248.

171. Attached as Exhibit 169 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590211.

172. Attached as Exhibit 170 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590352.

173. Attached as Exhibit 171 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590354.

174. Attached as Exhibit 172 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590350.

175. Attached as Exhibit 173 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591258.

176. Attached as Exhibit 174 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004597643.

177. Attached as Exhibit 175 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591290.

178. Attached as Exhibit 176 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591264.

179. Attached as Exhibit 177 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591279.

180. Attached as Exhibit 178 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591274.

181. Attached as Exhibit 179 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591312.

182. Attached as Exhibit 180 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591268.

183. Attached as Exhibit 181 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591302.

184. Attached as Exhibit 182 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591285.

185. Attached as Exhibit 183 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004590308.

186. Attached as Exhibit 184 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591319.

187. Attached as Exhibit 185 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004856310.

188. Attached as Exhibit 186 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004749373.

189. Attached as Exhibit 187 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004627714.

190. Attached as Exhibit 188 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004747415.

191. Attached as Exhibit 189 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004837622.

192. Attached as Exhibit 190 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740436.

193. Attached as Exhibit 191 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004661162.

194. Attached as Exhibit 192 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740447.

195. Attached as Exhibit 193 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004749176.

196. Attached as Exhibit 194 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740495.

197. Attached as Exhibit 195 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740468.

198. Attached as Exhibit 196 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740425.

199. Attached as Exhibit 197 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004651303.

200. Attached as Exhibit 198 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004635153.

201. Attached as Exhibit 199 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004849973.

202. Attached as Exhibit 200 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740461.

203. Attached as Exhibit 201 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004661172.

204. Attached as Exhibit 202 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004749357.

205. Attached as Exhibit 203 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004856032.

206. Attached as Exhibit 204 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004856018.

207. Attached as Exhibit 205 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002204111.

208. Attached as Exhibit 206 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001432313.

209. Attached as Exhibit 207 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002775289.

210. Attached as Exhibit 208 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286683.

211. Attached as Exhibit 209 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286653.

212. Attached as Exhibit 210 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286669.

213. Attached as Exhibit 211 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286883.

214. Attached as Exhibit 212 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286879.

215. Attached as Exhibit 213 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286952.

216. Attached as Exhibit 214 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286828.

217. Attached as Exhibit 215 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286839.

218. Attached as Exhibit 216 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286869.

219. Attached as Exhibit 217 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286896.

220. Attached as Exhibit 218 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286905.

221. Attached as Exhibit 219 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286908.

222. Attached as Exhibit 220 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286918.

223. Attached as Exhibit 221 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286944.

224. Attached as Exhibit 222 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002881548.

225. Attached as Exhibit 223 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002881558.

226. Attached as Exhibit 224 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002881569.

227. Attached as Exhibit 225 is a true and correct copy of the produced document bearing Bates DNP-00105558.

228. Attached as Exhibit 226 is a true and correct copy of the produced document bearing Bates DNP-00532336.

229. Attached as Exhibit 227 is a true and correct copy of the produced document bearing Bates DNP-00532245.

230. Attached as Exhibit 228 is a true and correct copy of the produced document bearing Bates NYT_00890201.

231. Attached as Exhibit 229 is a true and correct copy of Sam Felix Deposition Ex. 137.

232. Attached as Exhibit 230 is a true and correct copy of the transcript of the Deposition of Sam Felix.

233. Attached as Exhibit 231 is a true and correct copy of Brad Lightcap 30(b)(1) Deposition Ex. 17.

234. Attached as Exhibit 232 is a true and correct copy of Brad Lightcap 30(b)(1) Deposition Ex. 18.

235. Attached as Exhibit 233 is a true and correct copy of the transcript of the Deposition of Brad Lightcap.

236. Attached as Exhibit 234 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Geraldine Russell.

237. Attached as Exhibit 235 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000229826.

238. Attached as Exhibit 236 is a true and correct copy of the produced document bearing Bates DNP-00532259.

239. Attached as Exhibit 237 is a true and correct copy of New York Daily News' Fourth Supplemental Responses to OpenAI Second Set of Interrogatories.

240. Attached as Exhibit 238 is a true and correct copy of Orlando Sentinel's Fourth Supplemental Responses to OpenAI Second Set of Interrogatories.

241. Attached as Exhibit 239 is a true and correct copy of the produced document bearing Bates DNP-00532262.

242. Attached as Exhibit 240 is a true and correct copy of Denver Post's Fifth Supplemental Responses to OpenAI Second Set of Interrogatories.

243. Attached as Exhibit 241 is a true and correct copy of Pioneer Press's Fifth Supplemental Responses to OpenAI Second Set of Interrogatories.

244. Attached as Exhibit 242 is a true and correct copy of Mercury News's Fifth Supplemental Responses to OpenAI Second Set of Interrogatories.

245. Attached as Exhibit 243 is a true and correct copy of Orange County Register's Fifth Supplemental Responses to OpenAI Second Set of Interrogatories.

246. Attached as Exhibit 244 is a true and correct copy of "Frequently asked questions and answers," TollBit.

247. Attached as Exhibit 245 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Karen Oh.

248. Attached as Exhibit 246 is a true and correct copy of the produced document bearing Bates DNP-0001340.

249. Attached as Exhibit 247 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004660264.

250. Attached as Exhibit 248 is a true and correct copy of the produced document bearing Bates ZD0011967.

251. Attached as Exhibit 249 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004746029.

252. Attached as Exhibit 250 is a true and correct copy of AMAZ_OPENAI_00000476.

253. Attached as Exhibit 251 is a true and correct copy of AMAZ_OPENAI_00000421.

254. Attached as Exhibit 252 is a true and correct copy of AMAZ_OPENAI_00000312.

255. Attached as Exhibit 253 is a true and correct copy of AMAZ_OPENAI_00000523.

256. Attached as Exhibit 254 is a true and correct copy of AMAZ_OPENAI_00000553.

257. Attached as Exhibit 255 is a true and correct copy of AMAZ_OPENAI_00000515.

258. Attached as Exhibit 256 is a true and correct copy of AMAZ_OPENAI_00000322.

259. Attached as Exhibit 257 is a true and correct copy of AMAZ_OPENAI_00000466.

260. Attached as Exhibit 258 is a true and correct copy of AMAZ_OPENAI_00000351.

261. Attached as Exhibit 259 is a true and correct copy of AMAZ_OPENAI_00000490.

262. Attached as Exhibit 260 is a true and correct copy of AMAZ_OPENAI_00000291.

263. Attached as Exhibit 261 is a true and correct copy of AMAZ_OPENAI_00000572.

264. Attached as Exhibit 262 is a true and correct copy of AMAZ_OPENAI_00000505.

265. Attached as Exhibit 263 is a true and correct copy of AMAZ_OPENAI_00000387.

266. Attached as Exhibit 264 is a true and correct copy of AMAZ_OPENAI_00000531.

267. Attached as Exhibit 265 is a true and correct copy of AMAZ_OPENAI_00000300.

268. Attached as Exhibit 266 is a true and correct copy of AMAZ_OPENAI_00000434.

269. Attached as Exhibit 267 is a true and correct copy of AMAZ_OPENAI_00000367.

270. Attached as Exhibit 268 is a true and correct copy of AMAZ_OPENAI_00000543.

271. Attached as Exhibit 269 is a true and correct copy of AMAZ_OPENAI_00000378.

272. Attached as Exhibit 270 is a true and correct copy of AMAZ_OPENAI_00000457.

273. Attached as Exhibit 271 is a true and correct copy of AMAZ_OPENAI_00000332.

274. Attached as Exhibit 272 is a true and correct copy of AMAZ_OPENAI_00000341.

275. Attached as Exhibit 273 is a true and correct copy of "AI content licensing lessons from Factiva and TIME," Digital Content Next, March 6, 2025, https://digitalcontentnext.org/blog/2025/03/06/ai-content-licensing-lessons-from-factiva-and-time/.

276. Attached as Exhibit 274 is a true and correct copy of an article titled "AI search engine Perplexity launches revenue sharing with six news publishers," Deck, A. NiemanLab, [https://www.niemanlab.org/2024/07/perplexity-ai-search-engine-launches-revenue-sharing-with-six-news-publishers/] dated July 30, 2024.

277. Attached as Exhibit 275 is a true and correct copy of Wigger, Kyle, "Perplexity expands its publisher program," TechCrunch, December 5, 2024, https://techcrunch.com/2024/12/05/perplexity-expands-its-publisher-program/.

278. Attached as Exhibit 276 is a true and correct copy of an article titled "ProRata Announces Gist.ai, New AI Search Engine Based Entirely on High-Quality Licensed Content," Business Wire, [https://www.businesswire.com/news/home/20241209071998/en/ProRata-Announces-Gist.ai-New-AI-Search-Engine-Based-Entirely-on-High-Quality-Licensed-Content] dated December 9, 2024.

279. Attached as Exhibit 277 is a true and correct copy of an article titled "News/Media Alliance Announces AI Licensing Partnership with ProRata," Quigley, S. News/Media Alliance, March 26, 2025, [https://www.newsmediaalliance.org/prorata-licensing-partnership/].

280. Attached as Exhibit 278 is a true and correct copy of an article titled "AI Licensing by AI Companies," [https://copyrightalliance.org/artificial-intelligence-copyright/licensing/ai-companies/] dated October 7, 2025.

281. Attached as Exhibit 279 is a true and correct copy of an article titled "Boston Globe, Future, Vox Media join ProRata's generative AI licensing model," Guaglione, S. Digiday , June 6, 2025, [https://digiday.com/media/boston-globe-future-vox-media-join-proratas-generative-ai-licensing-model/].

282. Attached as Exhibit 280 is a true and correct copy of an article titled "Man of Many Partners with ProRata.AI to Champion Fair Publisher Compensation & Attribution in the Age of AI," Purcell, S. June 24, 2025,[https://advertise.manofmany.com/blog/prorata-ai/].

283. Attached as Exhibit 281 "is a true and correct copy of an article titled "Partnering with ProRata to explore a fair model for AI content use,""

[https://raptive.com/blog/partnering-with-prorata-to-explore-a-fair-model-for-ai-content-use/"] dated September 9, 2025.

284. Attached as Exhibit 282 is a true and correct copy of an article titled "CherryRoad® Media to Empower Local Communities with Hyper-Local AI Search Powered by Gist Answers," PR Newswire, September 11, 2025, [https://www.prnewswire.com/news-releases/cherryroad-media-to-empower-local-communities-with-hyper-local-ai-search-powered-by-gist-answers-302553993.html?tc=eml_cleartime].

285. Attached as Exhibit 283 is a true and correct copy of an article titled "CCC Announces a Collective Licensing Subscription for AI Systems," Publishing Perspectives, July 16, 2024, [https://publishingperspectives.com/2024/07/ccc-announces-a-collective-licensing-subscription-for-ai-systems/].

286. Attached as Exhibit 284 is a true and correct copy of an article titled "Introducing pay per crawl: Enabling content owners to charge AI crawlers for access," Allen, Will, et al., Cloudflare, Inc., July 1, 2025, [https://blog.cloudflare.com/introducing-pay-per-crawl/].

287. Attached as Exhibit 285 is a true and correct copy of an article titled "ProRata Invents Generative AI Attribution Technology to Compensate and Credit Content Owners While Facilitating Fairness and Fact," BusinessWire, [https://www.businesswire.com/news/home/20240806000889/en/ProRata-Invents-Generative-AI-Attribution-Technology-to-Compensate-and-Credit-Content-Owners-While-Facilitating-Fairness-and-Fact].

288. Attached as Exhibit 286 is a true and correct copy of a capture of the webpage available at https://prorata.ai/.

289. Attached as Exhibit 287 is a true and correct copy of an article titled "AI Visibility," ScalePost, [https://web.archive.org/web/20251116101520/https://www.scalepost.ai/].

290. Attached as Exhibit 288 is a true and correct copy of "AI Content Licensing: Startups Ensure Compensation When AI Consumes Your Creativity," OpenTools, https://opentools.ai/news/ai-content-licensing-startups-ensure-compensation-when-ai-consumes-your-creativity.

291. Attached as Exhibit 289 is a true and correct copy of an article titled "ScalePost – About us," Paraform, [https://www.paraform.com/company/scalepost].

292. Attached as Exhibit 290 is a true and correct copy of an article titled "Deal Dive: Human Native AI is building the marketplace for AI training licensing deals," Szkutak, Rebecca, TechCrunch, June 8, 2024, [https://techcrunch.com/2024/06/08/deal-dive-human-native-ai-is-building-the-marketplace-for-ai-training-licensing-deals/]

293. Attached as Exhibit 291 is a true and correct copy of an article titled "Two former Google employees, James Smith and Ani Attamian, discuss data licensing," All About Digital Publishing, [https://all-about-digital-publishing.com/en/1/human-native-ai].

294. Attached as Exhibit 292 is a true and correct copy of an article titled "Cloudflare Strengthens Content Offering to AI Companies with Acquisition of Human Native," Cloudflare, Jan. 15, 2026, [https://www.cloudflare.com/press/press-releases/2026/cloudflare-strengthens-content-offering-to-ai-companies-with-acquisition-of-human-native/].

295. Attached as Exhibit 293 is a true and correct copy of an article titled "CCC (Copyright Clearance Center) Expands Annual Copyright License for Higher Education to Include Internal-Use Reuse Rights," Globe Newswire, May 6, 2026, [https://www.globenewswire.com/news-release/2026/05/06/3288897/0/en/ccc-copyright-clearance-center-expands-annual-copyright-license-for-higher-education-to-include-internal-use-ai-reuse-rights.html].

296. Attached as Exhibit 294 is a true and correct copy of an article titled "Dappier is building a marketplace for publishers to sell their content to LLM builders," Miller, Ron, TechCrunch, June 26, 2024, [https://techcrunch.com/2024/06/26/dappier-is-building-a-marketplace-for-publishers-to-sell-their-content-to-llm-builders/].

297. Attached as Exhibit 295 is a true and correct copy of an article titled "About us," Defined.AI, [https://defined.ai/about-us].

298. Attached as Exhibit 296 is a true and correct copy of an article titled "Partner with the Leading AI Marketplace," Defined.ai, [https://defined.ai/partnerships].

299. Attached as Exhibit 297 is a true and correct copy of an article titled "Forming partnerships where content meets technology," Goodrights, [https://www.goodrights.com/about].

300. Attached as Exhibit 298 is a true and correct copy of an article titled "Valyu," Pitchbook, [https://pitchbook.com/profiles/company/592911-01].

301. Attached as Exhibit 299 is a true and correct copy of the produced document bearing Bates DNP-00535857.

302. Attached as Exhibit 300 is a true and correct copy of the produced document bearing Bates DNP-00535858.

303. Attached as Exhibit 301 a true and correct copy of an article titled "Calliope Networks," Calliope Networks, [https://calliopenetworks.ai/].

304. Attached as Exhibit 302 a true and correct copy of an article titled "Turn Your Data Into Assets (Responsibly)," Personal Digital Spaces, [https://www.personaldigitalspaces.com/].

305. Attached as Exhibit 303 a true and correct copy of an article titled "About DPA Dataset Providers Alliance," DPA, [https://www.thedpa.ai/].

306. Attached as Exhibit 304 a true and correct copy of an article titled "RSL Really Simple Licensing," RSL, [https://rslstandard.org/].

307. Attached as Exhibit 305 is a true and correct copy of Alexandra Tremayne-Pengelly, "Ilya Sutskever Warns A.I. Is Running Out of Data – Here's What Will Happen Next," Observer (Dec. 16, 2024), https://observer.com/2024/12/openai-cofounder-ilya-sutskever-ai-data-peak/.

308. Attached as Exhibit 306 a true and correct copy of an article titled "How Perplexity calculates publishers' share of ad revenue," Guaglione, S., Digiday, December 17, 2024, [https://digiday.com/media/how-perplexity-calculates-publishers-share-of-ad-revenue/].

309. Attached as Exhibit 307 is a true and correct copy of Bruell, Alexandra, "New York Times to Bezos-Backed AI Startup: Stop Using Our Stuff ," The Wall Street Journal, October 15, 2024, https://www.wsj.com/business/media/new-york-times-to-bezos-backed-ai-startup-stop-using-our-stuff-20faf2eb.

310. Attached as Exhibit 308 is a true and correct copy of Tim Frank, "Building Toward a Sustainable Content Economy for the Agentic Web," https://about.ads.microsoft.com/en/blog/post/february-2026/building-toward-a-sustainable-content-economy-for-the-agentic-web.

311. Attached as Exhibit 309 is a true and correct copy of 30(b)(6) Deposition of Simone Procas.

312. Exhibit 310 was intentionally omitted.

313. Attached as Exhibit 311 is a true and correct copy of the deposition transcript of Annie Chabel as the corporate representative for The Intercept Media, Inc., in the above-captioned matter, dated February 23, 2026.

314. Exhibit 312 is a true and correct copy of the produced documents bearing Bates NYT_00000001 – NYT_00020143; NYT_00146890 – NYT_00147431; NYT_00186429 – NYT_00191175; NYT_00218808 – NYT_00264891; NYT_00420950 – NYT_00420951, which is being submitted to the Court via hard drive.

315. Attached as Exhibit 313 is a true and correct copy of Ex. 3 to the Deposition of Procas.

316. Attached as Exhibit 314 is a true and correct copy of the produced document bearing Bates NYT_01073941.

317. Attached as Exhibit 315 is a true and correct copy of the produced document bearing Bates NYT_01018154.

318. Attached as Exhibit 316 is a true and correct copy of the produced document bearing Bates NYT_01037251.

319. Attached as Exhibit 317 is a true and correct copy of the produced document bearing Bates NYT_01037185.

320. Attached as Exhibit 318 is a true and correct copy of the produced document bearing Bates NYT_01017917.

321. Exhibit 319 is a true and correct copy of Compilation of Freelance Contracts in Bates Range NYT_00167195-NYT_00678326, which is being submitted to the Court via hard drive.

322. Attached as Exhibit 320 is a true and correct copy of the produced document bearing Bates NYT_01017942.

323. Attached as Exhibit 321 is a true and correct copy of the produced document bearing Bates NYT_01012376.

324. Attached as Exhibit 322 is a true and correct copy of the produced document bearing Bates NYT_01017921.

325. Attached as Exhibit 323 is a true and correct copy of the produced document bearing Bates NYT_01012415.

326. Attached as Exhibit 324 is a true and correct copy of the produced documents bearing Bates DNP-00160885-952, DNP-00001672-2002; DNP-00000944 – 1338; DNP-00035848-DNP-00035881, DNP-00263284-DNP-00263464, DNP-00348298-302, DNP-00160953- 1088, DNP-00001604-1671; DNP-00263471-DNP-00263604, DNP-00001343-1603,

DNP-00000187-430, DNP-00035985 - DNP-00036038, DNP-00263465-70, DNP-00348303, DNP-00002003-2209, DNP-00036105 - DNP-00036241, DNP-00000451-942, DNP-00036039 - DNP-00036104, DNP-00640861-64, DNP-00640879-964 (Copyright Registrations).

327. Attached as Exhibit 325 is a true and correct copy of the deposition transcript of Robyn Moris as the corporate representative for Daily News Plaintiffs, in the above-captioned matter, dated March 25, 2026.

328. Attached as Exhibit 326 is a true and correct copy of the produced document bearing Bates DNP-00597374.

329. Attached as Exhibit 327 is a true and correct copy of the produced documents bearing Bates DNP-00532008, DNP-00532006.

330. Attached as Exhibit 328 is a true and correct copy of the produced document bearing Bates DNP-00000139.

331. Attached as Exhibit 329 is a true and correct copy of the produced document bearing Bates DNP-0001341.

332. Attached as Exhibit 330 is a true and correct copy of the produced document bearing Bates DNP-0001342.

333. Exhibit 331 was intentionally omitted.

334. Attached as Exhibit 332 is a true and correct copy of the produced document bearing Bates DNP-00597370.

335. Attached as Exhibit 333 is a true and correct copy of the produced documents bearing Bates DNP-00534593, DNP-00534595, DNP-00534573, DNP-00359849, DNP-

00534561, DNP-00534569, DNP-00534609, DNP-00534619, DNP-00534603, DNP-00534599, DNP-00534557, DNP-00534553, DNP-00534603, DNP-00534597, DNP-00534607, DNP-00534615, DNP-00359040, DNP-00534611, DNP-00534585, DNP-00534581, DNP-00359813, DNP-00359777, DNP-00359044, DNP-00359665, DNP-00359168, DNP-00359148, DNP-00189222, DNP-00189218 (Freelance Agreements).

336. Attached as Exhibit 334 is a true and correct copy of the produced documents bearing Bates DNP-00636447, DNP-00636773, DNP-00636829 (Staff Lists).

337. Attached as Exhibit 335 is a true and correct copy of the produced documents bearing Bates DNP-00035848-DNP-00035881, DNP-00263284-DNP-00263464, DNP-00348298-302, DNP-00160953- 1088, DNP-00001604-1671 (Certificates).

338. Attached as Exhibit 336 is a true and correct copy of the produced document bearing Bates DNP-00597377.

339. Attached as Exhibit 337 is a true and correct copy of the produced documents bearing Bates DNP-00263471-DNP-00263604, DNP-00001343-1603.

340. Attached as Exhibit 338 is a true and correct copy of the produced documents bearing Bates DNP-00532021, DNP-00532024, DNP-00532030, DNP-00531997, DNP-00532000, DNP-00532039, DNP-00532027, DNP-00532018, DNP-00531992, DNP-00532036, DNP-00532033, DNP-00532003 (Freelance Agreements with Work-for-Hire Language).

341. Attached as Exhibit 339 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004794796.

342. Attached as Exhibit 340 is a true and correct copy of the produced documents bearing Bates DNP-00473402, DNP-00533839, DNP-00522201.

343. Attached as Exhibit 341 is a true and correct copy of the produced documents bearing Bates DNP-00468959, DNP-00468964.

344. Attached as Exhibit 342 is a true and correct copy of the produced document bearing Bates DNP-00597373.

345. Attached as Exhibit 343 is a true and correct copy of the transcript of the Deposition of R. Rob Dominguez.

346. Attached as Exhibit 344 is a true and correct copy of the transcript of the Deposition of E. Elaine Varvatos.

347. Attached as Exhibit 345 is a true and correct copy of the produced document bearing Bates DNP-00651698.

348. Attached as Exhibit 346 is a true and correct copy of the produced document bearing Bates DNP-00597375.

349. Attached as Exhibit 347 is a true and correct copy of the produced document bearing Bates DNP-00597376.

350. Attached as Exhibit 348 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Todd Harmonson.

351. Attached as Exhibit 349 is a true and correct copy of transcript of the 30(b)(1) Deposition of Andrew Julien.

352. Attached as Exhibit 350 is a true and correct copy of the transcript of the Deposition of Sarah Dussault.

353. Attached as Exhibit 351 is a true and correct copy of the transcript of the Deposition of Lee Ann Colacioppo.

354. Attached as Exhibit 352 is a true and correct copy of the produced document bearing Bates ZD0668175–180.

355. Attached as Exhibit 353 is a true and correct copy of the produced document bearing Bates ZD0631198–205.

356. Attached as Exhibit 354 is a true and correct copy of the produced document bearing Bates ZD0631212.

357. Attached as Exhibit 355 is a true and correct copy of the produced document bearing Bates ZD0632785-786.

358. Attached as Exhibit 356 is a true and correct copy of the produced document bearing Bates ZD0576916-953.

359. Attached as Exhibit 357 is a true and correct copy of the produced document bearing Bates ZD0668127–174.

360. Attached as Exhibit 358 is a true and correct copy of the produced document bearing Bates ZD0631559–644.

361. Attached as Exhibit 359 is a true and correct copy of the produced document bearing Bates ZD0631657–710.

362. Attached as Exhibit 360 is a true and correct copy of the produced document bearing Bates ZD0629955–972.

363. Attached as Exhibit 361 is a true and correct copy of the produced document bearing Bates ZD0631258–267.

364. Attached as Exhibit 362 is a true and correct copy of the produced document bearing Bates ZD0631381–392.

365. Attached as Exhibit 363 is a true and correct copy of Ziff Davis's First Amended Complaint, Ex. B.

366. Attached as Exhibit 364 is a true and correct copy of Ziff Davis's Supplemental Response to Interrogatory No. 2 (Apr. 17, 2026).

367. Attached as Exhibit 365 is a true and correct copy of the produced document bearing Bates ZD0547723.

368. Attached as Exhibit 366 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Lindsey Turrentine.

369. Attached as Exhibit 367 is a true and correct copy of the produced document bearing Bates ZD0533502.

370. Attached as Exhibit 368 is a true and correct copy of the produced document bearing Bates ZD0519120.

371. Attached as Exhibit 369 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Rachel Warren.

372. Attached as Exhibit 370 is a true and correct copy of the produced document bearing Bates ZD0547945.

373. Attached as Exhibit 371 is a true and correct copy of transcript of the 30(b)(6) Deposition of Hannah Yang.

374. Attached as Exhibit 372 is a true and correct copy of "Help: Updates to a News Website _ U.S. Copyright Office" available at https://www.copyright.gov/eco/grnw/help-tx.html.

375. Attached as Exhibit 373 is a true and correct copy of "Registration Options for Non-Photographic Databases _ FAQ" available at https://copyright.gov/non-photographic-databases/faq.pdf.

376. Attached as Exhibit 374 is a true and correct copy of the produced document bearing Bates ZD0668198.

377. Attached as Exhibit 375 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004589228.

378. Attached as Exhibit 376 is a true and correct copy of the produced document bearing Bates NYT_00218255.

379. Attached as Exhibit 377 is a true and correct copy of the transcript of the Deposition of Avi Goldfarb.

380. Attached as Exhibit 378 is a true and correct copy of the transcript of the Deposition of Kalani Gordon.

381. Attached as Exhibit 379 is a true and correct copy of the produced document bearing Bates NYT_00747643.

382. Attached as Exhibit 380 is a true and correct copy of the produced document bearing Bates NYT_00761744.

383. Attached as Exhibit 381 is a true and correct copy of the produced document bearing Bates NYT_00685761.

384. Attached as Exhibit 382 is a true and correct copy of "What Makes a Times Article Go Viral," New York Times, https://www.nytimes.com/2022/03/16/insider/what-makes-a-times-article-go-viral.html.

385. Attached as Exhibit 383 is a true and correct copy of the produced document bearing Bates DNP-00473273.

386. Attached as Exhibit 384 is a true and correct copy of the produced document bearing Bates DNP-00473294.

387. Attached as Exhibit 385 is a true and correct copy of the produced document bearing Bates DNP-00035917-927.

388. Attached as Exhibit 386 is a true and correct copy of Exhibit 7 to the Deposition of Mitch Pugh.

389. Attached as Exhibit 387 is a true and correct copy of the produced document bearing Bates DNP-00366818 (Chicago).

390. Attached as Exhibit 388 is a true and correct copy of the produced document bearing Bates DNP-00366819 (Denver).

391. Attached as Exhibit 389 is a true and correct copy of the produced document bearing Bates DNP-00366820 (Mercury).

392. Attached as Exhibit 390 is a true and correct copy of the produced document bearing Bates DNP-00366821 (NYDN).

393. Attached as Exhibit 391 is a true and correct copy of the produced document bearing Bates DNP-00366822 (OCR).

394. Attached as Exhibit 392 is a true and correct copy of the produced document bearing Bates DNP-00366823 (Orlando).

395. Attached as Exhibit 393 is a true and correct copy of the produced document bearing Bates DNP-00366824 (Sun Sentinel).

396. Attached as Exhibit 394 is a true and correct copy of the produced document bearing Bates DNP-00366825 (Pioneer Press).

397. Attached as Exhibit 395 is a true and correct copy of the produced document bearing Bates DNP-00366826 (Aggregated).

398. Attached as Exhibit 396 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Adel Ibrahim.

399. Attached as Exhibit 397 is a true and correct copy of the produced document bearing Bates DNP-00536141-188.

400. Attached as Exhibit 398 is a true and correct copy of the produced document bearing Bates DNP-00535998.

401. Attached as Exhibit 399 is a true and correct copy of the produced document bearing Bates DNP-00536010.

402. Attached as Exhibit 400 is a true and correct copy of a capture of the webpage available at https://help.nytimes.com/115014893428-Terms-of-Service.

403. Attached as Exhibit 401 is a true and correct copy of the produced document bearing Bates DNP-00534072-074.

404. Attached as Exhibit 402 is a true and correct copy of the produced document bearing Bates DNP-00534075-077.

405. Attached as Exhibit 403 is a true and correct copy of the produced document bearing Bates DNP-00534078-079.

406. Attached as Exhibit 404 is a true and correct copy of the produced document bearing Bates DNP-00534101-104.

407. Attached as Exhibit 405 is a true and correct copy of the produced document bearing Bates DNP-00534105-108.

408. Attached as Exhibit 406 is a true and correct copy of the produced document bearing Bates DNP-00534109-113.

409. Attached as Exhibit 407 is a true and correct copy of the produced document bearing Bates DNP-00534114-117.

410. Attached as Exhibit 408 is a true and correct copy of "Pulitzer Prize Winners From The New York Times," New York Times, https://www.nytimes.com/spotlight/pulitzer-winners-new-york-times.

411. Attached as Exhibit 409 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Adam Perelman.

412. Attached as Exhibit 410 is a true and correct copy of Dr. Nick Feamster Opening Report.

413. Attached as Exhibit 411 is a true and correct copy of the produced document bearing Bates NYT_01014327.

414. Attached as Exhibit 412 is a true and correct copy of Ex. 19 to the Deposition of Hannah Yang.

415. Attached as Exhibit 413 is a true and correct copy of the produced document bearing Bates NYT_00733728.

416. Attached as Exhibit 414 is a true and correct copy of the transcript to the 30(b)(6) Deposition of Ian Sohl.

417. Attached as Exhibit 415 is a true and correct copy of the transcript of the Deposition of Christine Liang.

418. Attached as Exhibit 416 is a true and correct copy of the transcript of the Deposition of Chris Hallacy.

419. Attached as Exhibit 417 is a true and correct copy of a capture of the webpage available at https://developers.openai.com/api/docs/bots/.

420. Attached as Exhibit 418 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001000137.

421. Attached as Exhibit 419 is a true and correct copy of the transcript of the Deposition of Chris Wiggins.

422. Attached as Exhibit 420 is a true and correct copy of Ex. 13 to the Deposition of Christine Liang.

423. Attached as Exhibit 421 is a true and correct copy of the produced document bearing Bates NYT_00733685.

424. Attached as Exhibit 422 is a true and correct copy of Ex. 4 to the Deposition of Simone Procas.

425. Attached as Exhibit 423 is a true and correct copy of Dr. Nick Feamster's Rebuttal Report.

426. Attached as Exhibit 424 is a true and correct copy of the produced document bearing Bates DNP-00636037.

427. Attached as Exhibit 425 is a true and correct copy of CJ Jacobs deposition Exhibit 27.

428. Attached as Exhibit 426 is a true and correct copy of the produced document bearing Bates DNP-00636034.

429. Attached as Exhibit 427 is a true and correct copy of CJ Jacobs deposition Exhibit 30.

430. Attached as Exhibit 428 is a true and correct copy of the produced document bearing Bates DNP-00364948.

431. Attached as Exhibit 429 is a true and correct copy of the produced document bearing Bates DNP-00364953.

432. Attached as Exhibit 430 is a true and correct copy of the produced document bearing Bates DNP-00364958.

433. Attached as Exhibit 431 is a true and correct copy of the produced document bearing Bates DNP-00364963.

434. Attached as Exhibit 432 is a true and correct copy of the produced document bearing Bates DNP-00364968.

435. Attached as Exhibit 433 is a true and correct copy of the produced document bearing Bates DNP-00364973.

436. Attached as Exhibit 434 is a true and correct copy of the produced document bearing Bates DNP-00364978.

437. Attached as Exhibit 435 is a true and correct copy of the produced document bearing Bates DNP-00364939.

438. Attached as Exhibit 436 is a true and correct copy of the produced document bearing Bates DNP-00636036.

439. Attached as Exhibit 437 is a true and correct copy of the produced document bearing Bates DNP-00636031.

440. Attached as Exhibit 438 is a true and correct copy of the produced document bearing Bates ZD0497738.

441. Attached as Exhibit 439 is a true and correct copy of the produced document bearing Bates ZD0497847.

442. Attached as Exhibit 440 is a true and correct copy of the produced document bearing Bates ZD0499350.

443. Attached as Exhibit 441 is a true and correct copy of the produced document bearing Bates ZD0498777.

444. Attached as Exhibit 442 is a true and correct copy of the produced document bearing Bates ZD0499365.

445. Attached as Exhibit 443 is a true and correct copy of the produced document bearing Bates ZD0499364.

446. Attached as Exhibit 444 is a true and correct copy of the produced document bearing Bates ZD501190.

447. Attached as Exhibit 445 is a true and correct copy of the produced document bearing Bates NYT_00815634.

448. Attached as Exhibit 446 is a true and correct copy of Dr. Nick Feamster's Reply Report.

449. Attached as Exhibit 447 is a true and correct copy of the produced document bearing Bates ZD0601076.

450. Attached as Exhibit 448 is a true and correct copy of the produced document bearing Bates ZD0567082.

451. Attached as Exhibit 449 is a true and correct copy of the produced document bearing Bates NYT_00849355.

452. Attached as Exhibit 450 is a true and correct copy of the produced document bearing Bates NYT_00480186.

453. Attached as Exhibit 451 is a true and correct copy of a capture of the Sept. 22, 2023 Microsoft Blog Post "Announcing New Options for Webmasters to Control Usage of their Content in Bing Chat", https://blogs.bing.com/webmaster/september-2023/Announcing-new-options-for-webmasters-to-control-usage-of-their-content-in-Bing-Chat.

454. Attached as Exhibit 452 is a true and correct copy of a capture of the webpage available at https://www.bing.com/webmasters/help/webmaster-guidelines-30fba23a.

455. Attached as Exhibit 453 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000391970.

456. Attached as Exhibit 454 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Elbio Abib.

457. Attached as Exhibit 455 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000642967.

458. Attached as Exhibit 456 is a true and correct copy of the transcript of the Deposition of Alec Radford.

459. Attached as Exhibit 457 is a true and correct copy of Ex. 4 to the Deposition of Simone Procas.

460. Attached as Exhibit 458 is a true and correct copy of a capture of the webpage available at https://web.archive.org/web/20200304082533/https://help.nytimes.com/hc/en-us/articles/115014893428-Terms-of-service#4.

461. Attached as Exhibit 459 is a true and correct copy of a capture of the webpage available at https://web.archive.org/web/20231130225337/https://help.nytimes.com/hc/en-us/articles/115014893428-Terms-of-service.

462. Attached as Exhibit 460 is a true and correct copy of March 14, 2023 OpenAI Blog Post "GPT-4", https://openai.com/index/gpt-4-research/.

463. Attached as Exhibit 461 is a true and correct copy of Dr. Taylor Berg-Kirpatrick's Opening Report.

464. Attached as Exhibit 462 is a true and correct copy of OpenAI's Supplemental Response to NYT Interrogatory No. 7.

465. Exhibit 463 was intentionally omitted.

466. Attached as Exhibit 464 is a true and correct copy of June 11, 2020 OpenAI Blog Post, "OpenAI API," https://openai.com/index/openai-api/.

467. Attached as Exhibit 465 is a true and correct copy of November 30, 2022 OpenAI blog post, "Introducing ChatGPT," https://openai.com/index/chatgpt/.

468. Attached as Exhibit 466 is a true and correct copy of the transcript of the Deposition of John Schulman.

469. Attached as Exhibit 467 is a true and correct copy of Dr. Avi Goldfarb's NYT-DNP Opening Report.

470. Attached as Exhibit 468 is a true and correct copy of the produced document bearing Bates DNP-00536076.

471. Attached as Exhibit 469 is a true and correct copy of the produced document bearing Bates DNP-00536096.

472. Attached as Exhibit 470 is a true and correct copy of the produced document bearing Bates DNP-00536086.

473. Attached as Exhibit 471 is a true and correct copy of a capture of the webpage available at https://www.tribpub.com/central-terms-of-service/.

474. Attached as Exhibit 472 is a true and correct copy of a capture of the webpage available at https://www.medianewsgroup.com/terms-of-use/.

475. Attached as Exhibit 473 is a true and correct copy of the produced document bearing Bates DNP- 00535985.

476. Attached as Exhibit 474 is a true and correct copy of Dr. Avi Goldfarb's Ziff Davis Opening Report.

477. Attached as Exhibit 475 is a true and correct copy of the produced document bearing Bates DNP-00535992.

478. Attached as Exhibit 476 is a true and correct copy of the produced document bearing Bates INT0081475.

479. Attached as Exhibit 477 is a true and correct copy of the produced document bearing Bates INT0081492.

480. Attached as Exhibit 478 is a true and correct copy of the produced document bearing Bates CIR0085222.

481. Attached as Exhibit 479 is a true and correct copy of the produced document bearing Bates CIR0085024.

482. Attached as Exhibit 480 is a true and correct copy of the produced document bearing Bates CIR0085481.

483. Attached as Exhibit 481 is a true and correct copy of the produced document bearing Bates CIR0085036.

484. Attached as Exhibit 482 is a true and correct copy of Improving Language Understanding by Generative Pre-Training, https://cdn.openai.com/research-covers/language-unsupervised/language_understanding_paper.pdf.

485. Attached as Exhibit 483 is a true and correct copy of Dr. Chris Callison-Burch's Opening Report.

486. Attached as Exhibit 484 is a true and correct capture of the Feb. 14, 2019 OpenAI Blog Post "Better Language Models and Their Implications", https://openai.com/index/better-language-models/.

487. Attached as Exhibit 485 is a true and correct capture of the November 5, 2019 OpenAI Blog Post, "GPT-2: 1.5B release," https://openai.com/index/gpt-2-1-5b-release.

488. Attached as Exhibit 486 is a true and correct copy of Tom B. Brown, et al., Language Models Are Few-Shot Learners, OpenAI, May 28, 2020, https://arxiv.org/pdf/2005.14165.

489. Attached as Exhibit 487 is a true and correct copy of May 28, 2020 OpenAI Blog Post "Language Models Are Few-Shot Learners", https://openai.com/index/language-models-are-few-shot-learners/.

490. Attached as Exhibit 488 is a true and correct copy of OpenAI's June 10, 2025 Supplemental Response to NYT Interrogatory No. 7.

491. Attached as Exhibit 489 is a true and correct copy of OpenAI's January 27, 2026 Supplemental Response to ZD Interrogatory No. 6.

492. Attached as Exhibit 490 is a true and correct copy of OpenAI's Second Supplemental Response to Intercept Interrogatory No. 7 (Mar. 23, 2026).

493. Attached as Exhibit 491 is a true and correct copy of OpenAI's Supplemental Response to CIR Interrogatory No. 14 (Mar. 23, 2026).

494. Attached as Exhibit 492 is a true and correct copy of OpenAI's February 4, 2026 Supplemental Responses to News Plaintiffs' Request for Admission No. 69.

495. Attached as Exhibit 493 is a true and correct copy of the produced document bearing Bates OPCO_MDL_00133274.

496. Attached as Exhibit 494 is a true and correct copy of ChatGPT Release Notes, https://help.openai.com/en/articles/6825453-chatgpt-release-notes.

497. Attached as Exhibit 495 is a true and correct copy of "Introducing ChatGPT search," OpenAI (Oct. 31, 2024), https://openai.com/index/introducing-chatgpt-search/.

498. Attached as Exhibit 496 is a true and correct copy of transcript of the Deposition of James Dyett.

499. Attached as Exhibit 497 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001697051.

500. Attached as Exhibit 498 is a true and correct copy of Dr. Avi Goldfarb's NYT-DN Reply Report.

501. Attached as Exhibit 499 is a true and correct copy of Dr. Avi Goldfarb's Ziff Davis Reply Report.

502. Attached as Exhibit 500 is a true and correct copy of May 23, 2025 Monaco Declaration.

503. Attached as Exhibit 501 is a true and correct copy of Ex. 1 to the Deposition of Brad Lightcap.

504. Attached as Exhibit 502 is a true and correct copy of August 28, 2023 OpenAI Blog Post, "Introducing ChatGPT Enterprise," https://openai.com/index/introducing-chatgpt-enterprise/.

505. Attached as Exhibit 503 is a true and correct capture of "Scaling AI for everyone," OpenAI (Feb. 27, 2026), https://openai.com/index/scaling-ai-for-everyone/.

506. Attached as Exhibit 504 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004754941.

507. Attached as Exhibit 505 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Brad Lightcap.

508. Attached as Exhibit 506 is a true and correct copy of the transcript of the Deposition of Mira Murati.

509. Attached as Exhibit 507 is a true and correct copy of Nov. 6, 2023 OpenAI Blog Post "Introducing GPTs," https://openai.com/index/introducing-gpts/.

510. Attached as Exhibit 508 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Rohit Ramchandani.

511. Attached as Exhibit 509 is a true and correct copy of January 10, 2024 OpenAI Blog Post, "Introducing the GPT Store," https://openai.com/index/introducing-the-gpt-store/.

512. Attached as Exhibit 510 is a true and correct copy of Microsoft's Second Supplemental Response to Daily News Plaintiff's Second Set of Interrogatories.

513. Attached as Exhibit 511 is a true and correct copy of Microsoft's June 21, 2024 Response to New York Times Interrogatory No. 8.

514. Attached as Exhibit 512 is a true and correct copy of Nov. 15, 2023 Microsoft Blog Post, "Our Vision to Bring Microsoft Copilot to Everyone, and More," https://blogs.bing.com/search/november-2023/our-vision-to-bring-microsoft-copilot-to-everyone-and-more) at 1.

515. Attached as Exhibit 513 is a true and correct copy of the transcript of the Deposition of Jordi Ribas.

516. Attached as Exhibit 514 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Jon Tinter.

517. Attached as Exhibit 515 is a true and correct copy of the transcript of the Deposition of Mustafa Suleyman.

518. Attached as Exhibit 516 is a true and correct copy of Ex. 3 to the Deposition of Mustafa Suleyman.

519. Attached as Exhibit 517 is a true and correct copy of Dr. John Lafferty's Opening Report.

520. Attached as Exhibit 518 is a true and correct copy of the transcript of the Deposition of Dr. John Lafferty.

521. Attached as Exhibit 519 is a true and correct copy of the transcript of the Deposition of Miles Brundage.

522. Attached as Exhibit 520 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001894242.

523. Attached as Exhibit 521 is a true and correct copy of the transcript of the Deposition of Qiming Yuan.

524. Attached as Exhibit 522 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004405641.

525. Attached as Exhibit 523 is a true and correct copy of the transcript of the Deposition of Alex Passos.

526. Attached as Exhibit 524 is a true and correct copy of the transcript of the Deposition of Jakub Pachocki.

527. Attached as Exhibit 525 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Nick Ryder.

528. Attached as Exhibit 526 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Alex Paino.

529. Attached as Exhibit 527 is a true and correct copy of the transcript of the Deposition of Peter Welinder.

530. Attached as Exhibit 528 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Nick Turley.

531. Attached as Exhibit 529 is a true and correct copy of transcript of the Deposition of Ben Chess.

532. Attached as Exhibit 530 is a true and correct copy of the transcript of the Deposition of Johannes Heidecke.

533. Attached as Exhibit 531 is a true and correct copy of Microsoft Stock Price, MarketWatch, https://www.marketwatch.com/investing/stock/msft.

534. Attached as Exhibit 532 is a true and correct copy of "Microsoft Fiscal Year 2025 First Quarter Earnings Conference Call" October 30, 2024, https://www.microsoft.com/en-us/investor/events/fy-2025/earnings-fy-2025-q1.

535. Attached as Exhibit 533 is a true and correct copy of transcript of the Deposition of Satya Nadella.

536. Attached as Exhibit 534 is a true and correct copy of the produced document bearing Bates MCCAULEY000000582.

537. Attached as Exhibit 535 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001838416.

538. Attached as Exhibit 536 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004838040.

539. Attached as Exhibit 537 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001005468.

540. Attached as Exhibit 538 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002758534.

541. Attached as Exhibit 539 is a true and correct copy of the transcript of the Deposition of Janine Korovesis.

542. Attached as Exhibit 540 is a true and correct copy of a capture of the webpage NYTimes.com Homepage, https://www.nytimes.com/.

543. Attached as Exhibit 541 is a true and correct copy of The New York Times Company, Awards and Recognition, https://www.nytco.com/awards/.

544. Attached as Exhibit 542 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/1996.

545. Attached as Exhibit 543 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001286894.

546. Attached as Exhibit 544 is a true and correct copy of the produced document bearing Bates NYT_01017922.

547. Attached as Exhibit 545 is a true and correct copy of the produced document bearing Bates NYT_01012432.

548. Attached as Exhibit 546 is a true and correct copy of the produced document bearing Bates NYT_01017936.

549. Attached as Exhibit 547 is a true and correct copy of the produced document bearing Bates DNP-00478224.

550. Attached as Exhibit 548 is a true and correct copy of the produced document bearing Bates DNP-00477973.

551. Attached as Exhibit 549 is a true and correct copy of the produced document bearing Bates DNP-00532249.

552. Attached as Exhibit 550 is a true and correct copy of the transcript of the 30(b)(6) deposition of Peer Schneider.

553. Attached as Exhibit 551 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000481178.

554. Attached as Exhibit 552 is a true and correct copy of "Gift Articles for New York Times Subscribers" available at https://help.nytimes.com/360060848652-Gift-Articles-for-New-York-Times-Subscribers.

555. Attached as Exhibit 553 is a true and correct copy of Ex. 16 to the Deposition of Hannah Yang.

556. Attached as Exhibit 554 is a true and correct copy of OpenAI Help Page, "Creating and editing GPTs," https://help.openai.com/en/articles/8554397-creating-and-editing-gpts.

557. Attached as Exhibit 555 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002758540.

558. Attached as Exhibit 556 is a true and correct copy of Dr. On Amir's Opening Report.

559. Attached as Exhibit 557 is a true and correct copy of Microsoft's Subscription Plans, https://www.microsoft.com/en-us/microsoft-365/buy/compare-all-microsoft-365-products.

560. Attached as Exhibit 558 is a true and correct copy of Microsoft Fiscal Year 2026 Fourth Quarter Earnings Conference Call, https://www.microsoft.com/en-us/investor/events/fy-2026/earnings-fy-2026-q4.

561. Attached as Exhibit 559 is a true and correct copy of April 4, 2025 Microsoft Blog Post, "Introducing Copilot Search in Bing", https://blogs.bing.com/search/April-2025/Introducing-Copilot-Search-in-Bing.

562. Attached as Exhibit 560 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Sathish Manivannan.

563. Attached as Exhibit 561 is a true and correct copy of November 24, 2025 Declaration of Jacob Thornburgh.

564. Attached as Exhibit 562 is a true and correct copy of Microsoft's May 12, 2026 Supplemental Response to NYT Interrogatory 8.

565. Attached as Exhibit 563 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000666185.

566. Attached as Exhibit 564 is a true and correct copy of OpenAI Blog Post, "Our Structure," https://openai.com/our-structure/.

567. Attached as Exhibit 565 is a true and correct copy of OpenAI, Inc. Application for Recognition of Exemption (IRS Form 1023), December 8, 2015.

568. Attached as Exhibit 566 is a true and correct copy of Dec. 11, 2015 OpenAI Blog Post, "Introducing OpenAI," https://openai.com/index/introducing-openai/.

569. Attached as Exhibit 567 is a true and correct copy of the produced document bearing Bates OPCO_MDL_PD_000007967.

570. Attached as Exhibit 568 is a true and correct copy of the produced document bearing Bates OPCO_MDL_MUSK_000000879.

571. Attached as Exhibit 569 is a true and correct copy of the produced document bearing Bates OPCO_MDL_PD_000007912.

572. Attached as Exhibit 570 is a true and correct copy of the transcript of the Deposition of Sam Altman in *Musk v. Altman* No. 4:24-cv-04722-YGR (N.D. Cal.)

573. Attached as Exhibit 571 is a true and correct copy of the transcript of the Deposition of Greg Brockman in *Musk v. Altman,* No. 4:24-cv-04722-YGR (N.D. Cal.)

574. Attached as Exhibit 572 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004420637.

575. Attached as Exhibit 573 is a true and correct copy of the produced document bearing Bates OPCO_MDL_PD_000007962.

576. Attached as Exhibit 574 is a true and correct copy of a capture of the webpage available at https://news.microsoft.com/source/2019/07/22/openai-forms-exclusive-computing-partnership-with-microsoft-to-build-new-azure-ai-supercomputing-technologies/.

577. Attached as Exhibit 575 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000000345.

578. Attached as Exhibit 576 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001550855.

579. Attached as Exhibit 577 is a true and correct copy of Feb. 9, 2026 OpenAI Blog Post, "Testing ads in ChatGPT," https://openai.com/index/testing-ads-in-chatgpt/.

580. Attached as Exhibit 578 is a true and correct copy of "OpenAI's US ad pilot exceeds $100 million in annualized revenue in six weeks," Reuters, March 26, 2026, https://www.reuters.com/business/media-telecom/openais-us-ad-pilot-exceeds-100-million-annualized-revenue-six-weeks-2026-03-26/).

581. Attached as Exhibit 579 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004416645.

582. Attached as Exhibit 580 is a true and correct copy of the October 28,2025 OpenAI Blog Post, "Built to benefit everyone," https://openai.com/index/built-to-benefit-everyone/.

583. Attached as Exhibit 581 is a true and correct copy of "OpenAI may move forward with new business structure, partnership with Microsoft, regulators say," AP News, https://apnews.com/article/openai-chatgpt-nonprofit-microsoft-c661df3242766d6b0ddbab401ad1fd84).

584. Attached as Exhibit 582 is a true and correct copy of "OpenAI Abandons Planned For-Profit Conversion," The Wall Street Journal, https://www.wsj.com/tech/ai/openai-to-become-public-benefit-corporation-9e7896e0.

585. Attached as Exhibit 583 is a true and correct copy of "OpenAI projects $2.5 billion in ad revenue this year, $100 billion by 2030, Axios reports," Reuters, April 9, 2026, https://www.reuters.com/business/media-telecom/openai-projects-25-billion-ad-revenue-this-year-100-billion-by-2030-axios-2026-04-09/).

586. Attached as Exhibit 584 is a true and correct copy of a capture of the webpage available at https://openai.com/index/accelerating-the-next-phase-ai/.

587. Attached as Exhibit 585 is a true and correct copy of "Exclusive: OpenAI lays groundwork for juggernaut IPO at up to $1 trillion valuation," Reuters, https://www.reuters.com/business/openai-lays-groundwork-juggernaut-ipo-up-1-trillion-valuation-2025-10-29/).

588. Attached as Exhibit 586 is a true and correct copy of the transcript of the deposition of Ilya Sutskever in *Musk v. Altman,* 4:24-cv-04722-TGR (N.D. Cal.).

589. Attached as Exhibit 587 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002881404.

590. Attached as Exhibit 588 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002846147.

591. Attached as Exhibit 589 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002881406.

592. Attached as Exhibit 590 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002758528.

593. Attached as Exhibit 591 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002758535.

594. Attached as Exhibit 592 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002758533.

595. Attached as Exhibit 593 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000000972.

596. Attached as Exhibit 594 is a true and correct copy of "Microsoft 365," Microsoft, https://www.microsoft.com/en-us/licensing/product-licensing/microsoft-365.

597. Attached as Exhibit 595 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004805725.

598. Attached as Exhibit 596 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000792102.

599. Attached as Exhibit 597 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001937223.

600. Attached as Exhibit 598 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001697816.

601. Attached as Exhibit 599 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000004071.

602. Attached as Exhibit 600 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000037384.

603. Attached as Exhibit 601 is a true and correct copy of the transcript of the Deposition of Katie Griffiths.

604. Attached as Exhibit 602 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000000575.

605. Attached as Exhibit 603 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Griffith.

606. Attached as Exhibit 604 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002758532.

607. Attached as Exhibit 605 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Peter Hoeschele.

608. Attached as Exhibit 606 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000208547.

609. Attached as Exhibit 607 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Sam Altman.

610. Attached as Exhibit 608 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000169501.

611. Attached as Exhibit 609 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Ben Gaffney.

612. Attached as Exhibit 610 is a true and correct copy of Sept 25, 2025 Hearing Transcript.

613. Attached as Exhibit 611 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Luke Melton.

614. Attached as Exhibit 612 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000003514.

615. Attached as Exhibit 613 is a true and correct copy of the transcript of the January 27, 2026 30(b)(6) deposition of Padma Gaggara.

616. Attached as Exhibit 614 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001833041.

617. Attached as Exhibit 615 is a true and correct copy of the transcript of the August 20, 2025 30(b)(6) deposition of Padma Gaggara.

618. Attached as Exhibit 616 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001936752.

619. Attached as Exhibit 617 is a true and correct copy of the transcript of the 30(b)(6) deposition of Fabrice Canel.

620. Attached as Exhibit 618 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000255338.

621. Attached as Exhibit 619 is a true and correct copy of the transcript of the January 27, 2026 30(b)(6) deposition of Jamie Huynh.

622. Attached as Exhibit 620 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000096524.

623. Attached as Exhibit 621 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Nick Ryder.

624. Attached as Exhibit 622 is a true and correct copy of the produced document bearing Bates OPCO_MDL_002072434.

625. Attached as Exhibit 623 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Michael Wetter.

626. Attached as Exhibit 624 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000118608.

627. Attached as Exhibit 625 is a true and correct copy of the transcript of the Deposition of Dario Amodei.

628. Attached as Exhibit 626 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000046570.

629. Attached as Exhibit 627 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Ian Sohl.

630. Attached as Exhibit 628 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000467526.

631. Exhibit 629 was intentionally omitted.

632. Attached as Exhibit 630 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000462444.

633. Attached as Exhibit 631 is a true and correct copy of the transcript of the Deposition of Barabara Frederiksen-Cross.

634. Attached as Exhibit 632 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000458392.

635. Attached as Exhibit 633 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Alex Paino.

636. Attached as Exhibit 634 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004771618.

637. Attached as Exhibit 635 is a true and correct copy of the transcript of the deposition of Dr. Chris Callison-Burch.

638. Attached as Exhibit 636 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001051845.

639. Attached as Exhibit 637 is a true and correct copy of the transcript of the 30(b)(6) deposition of Barrett Zoph.

640. Attached as Exhibit 638 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000001011.

641. Attached as Exhibit 639 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Chris Koch.

642. Attached as Exhibit 640 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001052306.

643. Attached as Exhibit 641 is a true and correct copy of the transcript of the February 12, 2026 30(b)(6) Deposition of Johannes Heidecke.

644. Attached as Exhibit 642 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001053220.

645. Attached as Exhibit 643 is a true and correct copy of the transcript of the 30(b)(6) deposition of Microsoft employee Xia Song.

646. Attached as Exhibit 644 is a true and correct copy of Language Models Are Unsupervised Learners Paper, https://cdn.openai.com/better-language-models/language_models_are_unsupervised_multitask_learners.pdf.

647. Attached as Exhibit 645 is a true and correct copy of the transcript of the deposition of Lilian Weng.

648. Attached as Exhibit 646 is a true and correct copy of the produced document bearing Bates NYT_00203287.

649. Attached as Exhibit 647 is a true and correct copy of the transcript of the deposition of Mikhail Parakhin.

650. Attached as Exhibit 648 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002295146.

651. Attached as Exhibit 649 is a true and correct copy of the transcript of the Deposition of Mark Russinovich.

652. Attached as Exhibit 650 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000003441.

653. Attached as Exhibit 651 is a true and correct copy of the transcript of the April 8, 2026 30(b)(6) Deposition of Vincent Monaco.

654. Attached as Exhibit 652 is a true and correct copy of the produced document bearing Bates MSFT_ AI_MDL_000010360.

655. Attached as Exhibit 653 is a true and correct copy of the transcript of the Deposition of Betker.

656. Attached as Exhibit 654 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001798013.

657. Attached as Exhibit 655 is a true and correct copy of number of webpages scraped per domain downloaded from https://github.com/openai/gpt-2/blob/master/domains.txt.

658. Attached as Exhibit 656 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000040868.

659. Attached as Exhibit 657 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Elbio Abib.

660. Attached as Exhibit 658 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000019962.

661. Attached as Exhibit 659 is a true and correct copy of the transcript of the Deposition of Rob Cromwell.

662. Attached as Exhibit 660 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004635421.

663. Attached as Exhibit 661 is a true and correct copy of the transcript of the Deposition of Long Ouyang.

664. Attached as Exhibit 662 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001653588.

665. Attached as Exhibit 663 is a true and correct copy of the transcript of the Deposition of Benjamin Mann.

666. Attached as Exhibit 664 is a true and correct copy of Microsoft Form 10-Q for the Quarterly Period Ended September 30, 2025.

667. Attached as Exhibit 665 is a true and correct copy of the transcript of the Deposition of Jakub Pachocki.

668. Attached as Exhibit 666 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000228652.

669. Attached as Exhibit 667 is a true and correct copy of the January 27, 2026 transcript of the 30(b)(6) Deposition of Vincent Monaco.

670. Attached as Exhibit 668 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000008148.

671. Exhibit 669 is a true and correct copy of Wenger Supplemental Report Appendix 176, which was submitted to the Court via hard drive.

672. Attached as Exhibit 670 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000666181.

673. Attached as Exhibit 671 is a true and correct copy of the transcript of the Deposition of Brent Hecht.

674. Attached as Exhibit 672 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000003490.

675. Attached as Exhibit 673 is a true and correct copy of the transcript of the Deposition of Krishnan.

676. Attached as Exhibit 674 is a true and correct copy of the produced document bearing Bates OPCO_MDL_PD_000000432.

677. Attached as Exhibit 675 is a true and correct copy of Dr. Chris Callison-Burch's Reply Report.

678. Attached as Exhibit 676 is a true and correct copy of Dr. Chris Callison-Burch's Rebuttal Report.

679. Attached as Exhibit 677 is a true and correct copy of the transcript of the Deposition of Vivek Shah.

680. Attached as Exhibit 678 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004806204.

681. Attached as Exhibit 679 is a true and correct copy of Ex. 17 to the Deposition of Eric Rynerson.

682. Attached as Exhibit 680 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000000439.

683. Attached as Exhibit 681 is a true and correct copy of the transcript of the Deposition of Matt Dahlin.

684. Attached as Exhibit 682 is a true and correct copy of "Documents show OpenAI's long journey from nonprofit to $157B valued company," AP News, https://apnews.com/article/openai-nonprofit-application-tax-exempt-status-ebf38549cdf0529fc5ec727e2815ed12 (citing "Our Structure," OpenAI, https://openai.com/our-structure/; OpenAI, Inc. Application for Recognition of Exemption (IRS Form 1023), December 8, 2015;"Documents show OpenAI's long journey from nonprofit to $157B valued company," AP News, https://apnews.com/article/openai-nonprofit-application-tax-exempt-status-ebf38549cdf0529fc5ec727e2815ed12).

685. Attached as Exhibit 683 is a true and correct copy of the transcript of the Deposition of Dr. Laura Stamm.

686. Attached as Exhibit 684 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004672513.

687. Exhibit 685 was intentionally omitted.

688. Attached as Exhibit 686 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001895315.

689. Attached as Exhibit 687 is a true and correct copy of the transcript of the Deposition of Dr. Catherine Tucker.

690. Attached as Exhibit 688 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000113921.

691. Attached as Exhibit 689 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000156469.

692. Attached as Exhibit 690 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000113767.

693. Attached as Exhibit 691 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Matt Lindsay.

694. Attached as Exhibit 692 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001820445.

695. Attached as Exhibit 693 is a true and correct copy of the transcript of the Deposition of Olivia Joslin.

696. Attached as Exhibit 694 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001841113.

697. Attached as Exhibit 695 is a true and correct copy of Ex. 12 to the Deposition of Barrett Sheridan.

698. Attached as Exhibit 696 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000156332.

699. Attached as Exhibit 697 is a true and correct copy of Ex. 13 to the Deposition of Jason Sobel.

700. Attached as Exhibit 698 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004639273.

701. Attached as Exhibit 699 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Hannah Poferl.

702. Attached as Exhibit 700 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004836003.

703. Attached as Exhibit 701 is a true and correct copy of the transcript of the Deposition of Samantha Sherwin.

704. Attached as Exhibit 702 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001940220.

705. Attached as Exhibit 703 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Adel Ibrahim.

706. Attached as Exhibit 704 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001937738.

707. Attached as Exhibit 705 is a true and correct copy of the transcript of the Deposition of William Elward.

708. Attached as Exhibit 706 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001940102.

709. Attached as Exhibit 707 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Gregory Miller.

710. Attached as Exhibit 708 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001686009.

711. Attached as Exhibit 709 is a true and correct copy of the transcript of the Deposition of Glen Weyl.

712. Attached as Exhibit 710 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000000804.

713. Attached as Exhibit 711 is a true and correct copy of the transcript of the Deposition of William Gates.

714. Attached as Exhibit 712 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004673028.

715. Attached as Exhibit 713 is a true and correct copy of the transcript of the 30(b)(6) Deposition of Nick Turley.

716. Attached as Exhibit 714 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001900461.

717. Attached as Exhibit 715 is a true and correct copy of the transcript of the Deposition of Jack Clark.

718. Attached as Exhibit 716 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000479579.

719. Attached as Exhibit 717 is a true and correct copy of Ex. 2 to the Deposition of Sarah Bird.

720. Attached as Exhibit 718 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001644364.

721. Attached as Exhibit 719 is a true and correct copy of the transcript of the Deposition of Misha Bilenko.

722. Attached as Exhibit 720 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001939120.

723. Attached as Exhibit 721 is a true and correct copy of the transcript of the Deposition of Katherine Cook.

724. Attached as Exhibit 722 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002836983.

725. Attached as Exhibit 723 is a true and correct copy of Ex. 106 to the Deposition of Shantanu Jain.

726. Attached as Exhibit 724 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000665166.

727. Attached as Exhibit 725 is a true and correct copy of the transcript of the Deposition of Times employee Alex Hardiman.

728. Attached as Exhibit 726 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001815252.

729. Attached as Exhibit 727 is a true and correct copy of the transcript of the 30(b)(1) Deposition of Christine Mattheis.

730. Attached as Exhibit 728 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001639231.

731. Attached as Exhibit 729 is a true and correct copy of Aug. 22, 2023 OpenAI Blog Post “GPT-3.5 Turbo Fine-Tuning and API Updates”, https://openai.com/index/gpt-3-5-turbo-fine-tuning-and-api-updates/.

732. Attached as Exhibit 730 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001641776.

733. Attached as Exhibit 731 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001687062.

734. Attached as Exhibit 732 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000200524.

735. Attached as Exhibit 733 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004635615.

736. Attached as Exhibit 734 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001710573.

737. Attached as Exhibit 735 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000205483.

738. Attached as Exhibit 736 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004608715.

739. Attached as Exhibit 737 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004424027.

740. Attached as Exhibit 738 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004617667.

741. Attached as Exhibit 739 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004806459.

742. Attached as Exhibit 740 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004809431.

743. Attached as Exhibit 741 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004762295.

744. Attached as Exhibit 742 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001876595.

745. Attached as Exhibit 743 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000479924.

746. Attached as Exhibit 744 is a true and correct copy of the produced document bearing Bates NYT_01072302.

747. Attached as Exhibit 745 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000220773.

748. Attached as Exhibit 746 is a true and correct copy of Ian Sohl deposition Ex. 406.

749. Attached as Exhibit 747 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001900258.

750. Attached as Exhibit 748 is a true and correct copy of OpenAI's Responses to Daily News Plaintiffs' Fifth Set of Interrogatories.

751. Attached as Exhibit 749 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004738943.

752. Attached as Exhibit 750 is a true and correct copy of OpenAI's Supplemental Response to Daily News Interrogatory No. 10.

753. Attached as Exhibit 751 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004738868.

754. Attached as Exhibit 752 is a true and correct copy of OpenAI's Supplemental Response to ZD Interrogatory No. 20 (2/27/26).

755. Attached as Exhibit 753 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000155665.

756. Attached as Exhibit 754 is a true and correct copy of January 27, 2026 Email from Tom Gorman to Stephen Match.

757. Attached as Exhibit 755 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004585389.

758. Attached as Exhibit 756 is a true and correct copy of OpenAI's Supplemental Response to Intercept Interrogatory No. 3 (Dec. 31, 2025).

759. Attached as Exhibit 757 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000155738.

760. Exhibit 758 was intentionally omitted.

761. Attached as Exhibit 759 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004740422.

762. Attached as Exhibit 760 is a true and correct copy of the transcript of the January 28, 2026 30(b)(6) Deposition of Vincent Monaco.

763. Attached as Exhibit 761 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000481870.

764. Exhibit 762 was intentionally omitted.

765. Attached as Exhibit 763 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001669609.

766. Exhibit 764 was intentionally omitted.

767. Exhibit 765 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004598867 - OPCO_MDL_004599087, which was submitted to the Court via hard drive.

768. Exhibit 766 was intentionally omitted.

769. Attached as Exhibit 767 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004585370.

770. Exhibit 768 was intentionally omitted.

771. Attached as Exhibit 769 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001936736.

772. Exhibit 770 was intentionally omitted.

773. Attached as Exhibit 771 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000480333.

774. Exhibit 772 was intentionally omitted.

775. Attached as Exhibit 773 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004857423.

776. Exhibit 774 was intentionally omitted.

777. Attached as Exhibit 775 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004897960.

778. Exhibit 776 was intentionally omitted.

779. Attached as Exhibit 777 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004897963.

780. Exhibit 778 was intentionally omitted.

781. Attached as Exhibit 779 is a true and correct copy of the produced document bearing Bates OPCO_MDL_002138928.

782. Exhibit 780 was intentionally omitted.

783. Attached as Exhibit 781 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000999211.

784. Attached as Exhibit 782 is a true and correct copy of the produced document bearing OPCO_MDL_004619015

785. Attached as Exhibit 783 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004635019.

786. Attached as Exhibit 784 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001812710.

787. Exhibit 785 was intentionally omitted.

788. Exhibit 786 was intentionally omitted.

789. Attached as Exhibit 787 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000207987.

790. Exhibit 788 was intentionally omitted.

791. Attached as Exhibit 789 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001938504.

792. Exhibit 790 was intentionally omitted.

793. Attached as Exhibit 791 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001837518.

794. Exhibit 792 was intentionally omitted.

795. Attached as Exhibit 793 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004838627.

796. Exhibit 794 was intentionally omitted.

797. Attached as Exhibit 795 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000110815.

798. Exhibit 796 was intentionally omitted.

799. Attached as Exhibit 797 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001699893.

800. Exhibit 798 was intentionally omitted.

801. Attached as Exhibit 799 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001682605.

802. Attached as Exhibit 800 is a true and correct copy of Microsoft expert Dr. John Lafferty's Rebuttal Report.

803. Attached as Exhibit 801 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004754577.

804. Attached as Exhibit 802 is a true and correct copy of OpenAI expert Dr. Taylor Berg-Kirpatrick's Supplemental Expert Report.

805. Attached as Exhibit 803 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004760465.

806. Attached as Exhibit 804 is a true and correct copy of Dr. Taylor Berg-Kirkpatrick's Rebuttal Expert Report.

807. Attached as Exhibit 805 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001705863.

808. Attached as Exhibit 806 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002882532.

809. Attached as Exhibit 807 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001700392.

810. Attached as Exhibit 808 is a true and correct copy of the produced document bearing Bates NYT_00146766.

811. Attached as Exhibit 809 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004771719.

812. Attached as Exhibit 810 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001233834.

813. Attached as Exhibit 811 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001699373.

814. Exhibit 812 was intentionally omitted.

815. Attached as Exhibit 813 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001895987.

816. Attached as Exhibit 814 is a true and correct copy of OpenAI's Response to CIR's Fourth Set of Requests for Admission (Sept. 11, 2025).

817. Attached as Exhibit 815 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00007151.

818. Attached as Exhibit 816 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002881582.

819. Attached as Exhibit 817 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000157541.

820. Attached as Exhibit 818 is a true and correct copy of the produced document bearing Bates CIR0087749-CIR0105379, which was submitted to the Court via hard drive.

821. Attached as Exhibit 819 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00009143.

822. Exhibit 820 was intentionally omitted.

823. Attached as Exhibit 821 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00009131.

824. Exhibit 822 was intentionally omitted.

825. Attached as Exhibit 823 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00009183.

826. Exhibit 824 was intentionally omitted.

827. Attached as Exhibit 825 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00006440.

828. Exhibit 826 was intentionally omitted.

829. Attached as Exhibit 827 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00006740.

830. Exhibit 828 was intentionally omitted.

831. Exhibit 829 was intentionally omitted.

832. Exhibit 830 was intentionally omitted.

833. Attached as Exhibit 831 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00006563.

834. Exhibit 832 was intentionally omitted.

835. Attached as Exhibit 833 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00006515.

836. Exhibit 834 was intentionally omitted.

837. Attached as Exhibit 835 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00006565.

838. Exhibit 836 was intentionally omitted.

839. Attached as Exhibit 837 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00006651.

840. Exhibit 838 was intentionally omitted.

841. Attached as Exhibit 839 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00004962.

842. Attached as Exhibit 840 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000504460.

843. Attached as Exhibit 841 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000470814.

844. Attached as Exhibit 842 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000519542.

845. Attached as Exhibit 843 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001180287.

846. Attached as Exhibit 844 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001233825.

847. Attached as Exhibit 845 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000948603.

848. Attached as Exhibit 846 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002758601.

849. Attached as Exhibit 847 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000949427.

850. Attached as Exhibit 848 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000946783.

851. Attached as Exhibit 849 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000661033.

852. Attached as Exhibit 850 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000406914.

853. Attached as Exhibit 851 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000212025.

854. Attached as Exhibit 852 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000013670.

855. Attached as Exhibit 853 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000221702.

856. Attached as Exhibit 854 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000944196.

857. Attached as Exhibit 855 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000047584.

858. Attached as Exhibit 856 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000450551.

859. Attached as Exhibit 857 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002286292.

860. Attached as Exhibit 858 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001524111.

861. Attached as Exhibit 859 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873679.

862. Attached as Exhibit 860 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873609.

863. Attached as Exhibit 861 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873749.

864. Attached as Exhibit 862 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873595.

865. Attached as Exhibit 863 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873623.

866. Attached as Exhibit 864 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873637.

867. Attached as Exhibit 865 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873665.

868. Attached as Exhibit 866 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873693.

869. Attached as Exhibit 867 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873707.

870. Attached as Exhibit 868 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873735.

871. Attached as Exhibit 869 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002873763.

872. Attached as Exhibit 870 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000450229.

873. Attached as Exhibit 871 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00004276.

874. Exhibit 872 was intentionally omitted.

875. Attached as Exhibit 873 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00009137.

876. Attached as Exhibit 874 is a true and correct copy of the produced documents bearing Bates DNP-00160885-952, DNP-00001672-2002 (Certificates).

877. Attached as Exhibit 875 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00009185.

878. Attached as Exhibit 876 is a true and correct copy of the produced documents bearing Bates DNP-00360156, DNP-00359276, DNP-00360204, DNP-00360194, DNP-00359570, DNP-00360121, DNP-00359590, DNP-00360222, DNP-00360126.

879. Attached as Exhibit 877 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00009075.

880. Attached as Exhibit 878 is a true and correct copy of the produced documents bearing Bates DNP-00000187-430, DNP-00035985 - DNP-00036038.

881. Attached as Exhibit 879 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT_00009090.

882. Attached as Exhibit 880 is a true and correct copy of the produced document bearing Bates DNP-00117468-536.

883. Attached as Exhibit 881 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT_00009067.

884. Attached as Exhibit 882 is a true and correct copy of the produced documents bearing Bates DNP-00263465-70, DNP-00348303, DNP-00002003-2209.

885. Attached as Exhibit 883 is a true and correct copy of OPCO_OAI_OUTPUT00009156.

886. Attached as Exhibit 884 is a true and correct copy of the produced document bearing Bates DNP-00036105 - DNP-00036241.

887. Attached as Exhibit 885 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT00009045.

888. Attached as Exhibit 886 is a true and correct copy of the produced document bearing Bates DNP-00632457, DNP-00632475.

889. Attached as Exhibit 887 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT_00009169.

890. Attached as Exhibit 888 is a true and correct copy of the produced document bearing Bates DNP-00000451-942, DNP-00036039 - DNP-00036104.

891. Attached as Exhibit 889 is a true and correct copy of the produced document bearing Bates OPCO_OAI_OUTPUT_00009071.

892. Attached as Exhibit 890 is a true and correct copy of Stipulation between DNP and Defendants, dated February 7, 2025.

893. Attached as Exhibit 891 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001899968.

894. Exhibit 892 was intentionally omitted.

895. Attached as Exhibit 893 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001006273.

896. Attached as Exhibit 894 is a true and correct copy of DNP-HD002 -HD005, which was submitted to the Court via hard drive.

897. Attached as Exhibit 895 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004625973.

898. Attached as Exhibit 896 is a true and correct copy of the produced document bearing Bates DNP-00001187-1331.

899. Attached as Exhibit 897 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000479314.

900. Attached as Exhibit 898 is a true and correct copy of the produced document bearing Bates DNP-00001326-29.

901. Attached as Exhibit 899 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001686982.

902. Attached as Exhibit 900 is a true and correct copy of the produced document bearing Bates DNP-00636047-DNP-00636222.

903. Attached as Exhibit 901 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000494603.

904. Attached as Exhibit 902 is a true and correct copy of April 8, 2026 Declaration of OpenAI Associate General Counsel Michael Trinh.

905. Attached as Exhibit 903 is a true and correct copy of the produced document bearing Bates OPCO_MDL_002139639.

906. Attached as Exhibit 904 is a true and correct copy of the produced document bearing Bates DNP-00569617.

907. Attached as Exhibit 905 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000479741.

908. Attached as Exhibit 906 is a true and correct copy of Microsoft expert Dr. Christopher Bail's Opening Expert Report.

909. Attached as Exhibit 907 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001692573.

910. Attached as Exhibit 908 is a true and correct copy of "Introducing ChatGPT Pulse," OpenAI, September 25, 2025, https://openai.com/index/introducing-chatgpt-pulse/.

911. Attached as Exhibit 909 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004389835.

912. Attached as Exhibit 910 is a true and correct copy of the transcript from the January 14, 2025 hearing in this matter.

913. Attached as Exhibit 911 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004820692.

914. Attached as Exhibit 912 is a true and correct copy of Felps, Paula, "As Search Ends for News, Here is What's Next," INMA, April 2025.

915. Attached as Exhibit 913 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004661064.

916. Attached as Exhibit 914 is a true and correct copy of the September 2, 2025 Memorandum Opinion in *United States of America et al. v. Google LLC*, Case No. 20-cv-3010.

917. Attached as Exhibit 915 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004411433.

918. Attached as Exhibit 916 is a true and correct copy of "OpenAI's Sam Altman on Building the 'Core AI Subscription' For Your Life," Sequoia Capital (May 12, 2025), https://www.youtube.com/watch?v=ctcMA6chfDY.

919. Attached as Exhibit 917 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001699915.

920. Attached as Exhibit 918 is a true and correct copy of "State of the Bots (Q2 2025)," TollBit, https://tollbit.com/state-of-the-bots/q2-2025/, accessed via https://assets.cdn.tollbit.com/documents/whitepaper-q3-2025.pdf.

921. Attached as Exhibit 919 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001655887.

922. Exhibit 920 was intentionally omitted.

923. Attached as Exhibit 921 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001896229.

924. Exhibit 922 was intentionally omitted.

925. Attached as Exhibit 923 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001805669.

926. Exhibit 924 was intentionally omitted.

927. Attached as Exhibit 925 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004775473.

928. Exhibit 926 was intentionally omitted.

929. Attached as Exhibit 927 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004839087.

930. Exhibit 928 was intentionally omitted.

931. Attached as Exhibit 929 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004731498.

932. Attached as Exhibit 930 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000611908.

933. Attached as Exhibit 931 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898640.

934. Attached as Exhibit 932 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000182403.

935. Attached as Exhibit 933 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898659.

936. Attached as Exhibit 934 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000993734.

937. Attached as Exhibit 935 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898644.

938. Attached as Exhibit 936 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000994463.

939. Attached as Exhibit 937 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898645.

940. Attached as Exhibit 938 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000934681.

941. Attached as Exhibit 939 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898646.

942. Attached as Exhibit 940 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001513956.

943. Attached as Exhibit 941 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898647.

944. Attached as Exhibit 942 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002771169.

945. Attached as Exhibit 943 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898648.

946. Attached as Exhibit 944 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000256150.

947. Attached as Exhibit 945 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898649.

948. Attached as Exhibit 946 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000176010.

949. Attached as Exhibit 947 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898650.

950. Attached as Exhibit 948 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002179221.

951. Attached as Exhibit 949 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898651.

952. Attached as Exhibit 950 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_002776680.

953. Attached as Exhibit 951 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898652.

954. Attached as Exhibit 952 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000007246.

955. Attached as Exhibit 953 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898653.

956. Attached as Exhibit 954 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000908708.

957. Attached as Exhibit 955 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898654.

958. Attached as Exhibit 956 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000447446.

959. Attached as Exhibit 957 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898655.

960. Attached as Exhibit 958 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000687908.

961. Attached as Exhibit 959 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898656.

962. Attached as Exhibit 960 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_001360563.

963. Attached as Exhibit 961 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004898657.

964. Exhibit 962 was intentionally omitted.

965. Exhibit 963 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144089, which was submitted to the Court via hard drive.

966. Exhibit 964 was intentionally omitted.

967. Attached as Exhibit 965 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144090, which was submitted to the Court via hard drive.

968. Exhibit 966 was intentionally omitted.

969. Exhibit 967 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144091, which was submitted to the Court via hard drive.

970. Exhibit 968 was intentionally omitted.

971. Exhibit 969 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144092, which was submitted to the Court via hard drive.

972. Exhibit 970 was intentionally omitted.

973. Exhibit 971 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144093, which was submitted to the Court via hard drive.

974. Exhibit 972 was intentionally omitted.

975. Exhibit 973 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144094, which was submitted to the Court via hard drive.

976. Exhibit 974 was intentionally omitted.

977. Exhibit 975 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144095, which was submitted to the Court via hard drive.

978. Exhibit 976 was intentionally omitted.

979. Exhibit 977 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144096, which was submitted to the Court via hard drive.

980. Exhibit 978 was intentionally omitted.

981. Exhibit 979 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144097, which was submitted to the Court via hard drive.

982. Exhibit 980 was intentionally omitted.

983. Exhibit 981 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144098, which was submitted to the Court via hard drive.

984. Exhibit 982 was intentionally omitted.

985. Exhibit 983 is a true and correct copy of the produced document bearing Bates OPCO_NEWS_1144099, which was submitted to the Court via hard drive.

986. Exhibit 984 was intentionally omitted.

987. Exhibit 985 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000001, which was provided to the Court via hard drive.

988. Exhibit 986 was intentionally omitted.

989. Exhibit 987 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000002, which was provided to the Court via hard drive.

990. Exhibit 988 was intentionally omitted.

991. Exhibit 989 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000003, which was provided to the Court via hard drive.

992. Exhibit 990 was intentionally omitted.

993. Exhibit 991 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000004, which was provided to the Court via hard drive.

994. Exhibit 992 was intentionally omitted.

995. Exhibit 993 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000005, which was provided to the Court via hard drive.

996. Exhibit 994 was intentionally omitted.

997. Exhibit 995 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000006, which was provided to the Court via hard drive.

998. Exhibit 996 was intentionally omitted.

999. Exhibit 997 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000007, which was provided to the Court via hard drive.

1000. Exhibit 998 was intentionally omitted.

1001. Exhibit 999 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000008, which was provided to the Court via hard drive.

1002. Exhibit 1000 was intentionally omitted.

1003. Exhibit 1001 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000009, which was provided to the Court via hard drive.

1004. Exhibit 1002 was intentionally omitted.

1005. Exhibit 1003 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000010, which was provided to the Court via hard drive.

1006. Exhibit 1004 was intentionally omitted.

1007. Exhibit 1005 is a true and correct copy of the produced document bearing Bates OPCO_INTERCEPT_0000011, which was provided to the Court via hard drive.

1008. Exhibit 1006 was intentionally omitted.

1009. Attached as Exhibit 1007 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000207312.

1010. Exhibit 1008 was intentionally omitted.

1011. Attached as Exhibit 1009 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001699705.

1012. Exhibit 1010 was intentionally omitted.

1013. Attached as Exhibit 1011 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000002329.

1014. Exhibit 1012 was intentionally omitted.

1015. Attached as Exhibit 1013 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000150892.

1016. Exhibit 1014 was intentionally omitted.

1017. Attached as Exhibit 1015 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000155600.

1018. Exhibit 1016 was intentionally omitted.

1019. Exhibit 1017 was intentionally omitted.

1020. Exhibit 1018 was intentionally omitted.

1021. Attached as Exhibit 1019 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000609714.

1022. Exhibit 1020 was intentionally omitted.

1023. Attached as Exhibit 1021 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001837980.

1024. Exhibit 1022 was intentionally omitted.

1025. Attached as Exhibit 1023 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001635079.

1026. Exhibit 1024 was intentionally omitted.

1027. Attached as Exhibit 1025 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004397741.

1028. Exhibit 1026 was intentionally omitted.

1029. Attached as Exhibit 1027 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001699819.

1030. Exhibit 1028 was intentionally omitted.

1031. Attached as Exhibit 1029 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001710421.

1032. Exhibit 1030 was intentionally omitted.

1033. Attached as Exhibit 1031 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004796351.

1034. Exhibit 1032 was intentionally omitted.

1035. Attached as Exhibit 1033 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004734998.

1036. Exhibit 1034 was intentionally omitted.

1037. Attached as Exhibit 1035 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004735350.

1038. Exhibit 1036 was intentionally omitted.

1039. Attached as Exhibit 1037 is a true and correct copy of the produced document bearing Bates OPCO_MDL_002138926.

1040. Exhibit 1038 was intentionally omitted.

1041. Attached as Exhibit 1039 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001699457.

1042. Attached as Exhibit 1040 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004620488.

1043. Attached as Exhibit 1041 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004771735.

1044. Exhibit 1042 was intentionally omitted.

1045. Attached as Exhibit 1043 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004771748.

1046. Exhibit 1044 was intentionally omitted.

1047. Attached as Exhibit 1045 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004401106.

1048. Exhibit 1046 was intentionally omitted.

1049. Attached as Exhibit 1047 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000222028.

1050. Exhibit 1048 was intentionally omitted.

1051. Exhibit 1049 was intentionally omitted.

1052. Exhibit 1050 was intentionally omitted.

1053. Attached as Exhibit 1051 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001947427.

1054. Exhibit 1052 was intentionally omitted.

1055. Attached as Exhibit 1053 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000158237.

1056. Attached as Exhibit 1054 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591496.

1057. Attached as Exhibit 1055 is a true and correct copy of the produced document bearing Bates OPCO_MDL_002118849.

1058. Exhibit 1056 was intentionally omitted.

1059. Attached as Exhibit 1057 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004591556.

1060. Exhibit 1058 was intentionally omitted.

1061. Attached as Exhibit 1059 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000220898.

1062. Exhibit 1060 was intentionally omitted.

1063. Attached as Exhibit 1061 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001686928.

1064. Exhibit 1062 was intentionally omitted.

1065. Attached as Exhibit 1063 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000199315.

1066. Exhibit 1064 was intentionally omitted.

1067. Attached as Exhibit 1065 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001805836.

1068. Exhibit 1066 was intentionally omitted.

1069. Attached as Exhibit 1067 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000156260.

1070. Exhibit 1068 was intentionally omitted.

1071. Attached as Exhibit 1069 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001898994.

1072. Exhibit 1070 was intentionally omitted.

1073. Attached as Exhibit 1071 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001886041.

1074. Exhibit 1072 was intentionally omitted.

1075. Exhibit 1073 was intentionally omitted.

1076. Exhibits 1074-1099 were intentionally omitted.

1077. Attached as Exhibit 1100 is a true and correct copy of "Google AI Overview Study - SEO & PPC CTR impact," Seer interactive, February 4, 2025, https://www.seerinteractive.com/insights/ctr-aio.

1078. Attached as Exhibit 1101 is a true and correct copy of Kaiser et al., "A New Era of Online Search? A Large-Scale Study of User Behavior and Personal Preferences during Practical Search Tasks with Generative AI versus Traditional Search Engines," ACM CHI 2025. https://dl.acm.org/doi/10.1145/3706599.3720123.

1079. Exhibit 1102 was intentionally omitted.

1080. Attached as Exhibit 1103 is a true and correct copy of "Publishers facing existential threat from AI, Cloudflare CEO says," Axios, June 19, 2025, https://www.axios.com/2025/06/19/ai-searchtraffic-publishers.

1081. Attached as Exhibit 1104 is a true and correct copy of Jim Egan et al., Digital News Report 2026, 11, Reuters Institute for the Study of Journalism (2026), available at https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2026-06/DNR%202026%20FINAL_2.pdf.

1082. Attached as Exhibit 1105 is a true and correct copy of Tomasik, Emily and Michael Lipka, "Few Americans Pay for News When They Encounter Paywalls," Pew Research Center, June 24, 2025, available at https://www.pewresearch.org/short-reads/2025/06/24/few-americans-pay-for-news-when-they-encounter-paywalls/.

1083. Attached as Exhibit 1106 is a true and correct copy of The Times Supplemental Response to Microsoft's 2nd Interrogatory No. 15.

1084. Attached as Exhibit 1107 is a true and correct copy of the produced document bearing Bates DNP-00535654.

1085. Attached as Exhibit 1108 is a true and correct copy of "Representation of BBC News content in AI Assistants," BBC, https://www.bbc.co.uk/aboutthebbc/documents/bbc-research-into-ai-assistants.pdf.

1086. Attached as Exhibit 1109 is a true and correct copy of Spatharioti et al (Microsoft Research), "Comparing Traditional and LLM-based Search for Consumer Choice: A Randomized Experiment," arXiv 2023. https://arxiv.org/pdf/2307.03744.

1087. Attached as Exhibit 1110 is a true and correct copy of "OpenAI content boss on Google 'ten blue links' and arrival of ChatGPT search," Press Gazette, https://pressgazette.co.uk/platforms/openai-chatgpt-search-tom-rubin/.

1088. Attached as Exhibit 1111 is a true and correct copy of the produced document bearing Bates TONER_000000154.

1089. Attached as Exhibit 1112 is a true and correct copy of "Ways to Search (AI Overviews)," Google, https://search.google/ways-to-search/ai-overviews/.

1090. Attached as Exhibit 1113 is a true and correct copy of "Find information in faster & easier ways with AI Overviews in Google Search," Google Search Help, https://support.google.com/websearch/answer/14901683.

1091. Attached as Exhibit 1114 is a true and correct copy of Reid, Elizabeth, "Generative AI in Search: Let Google do the searching for you," Google, May 14, 2024, https://blog.google/products-and-platforms/products/search/generative-ai-google-search-may-2024/.

1092. Attached as Exhibit 1115 is a true and correct copy of "ChatGPT Capabilities Overview," OpenAI, https://help.openai.com/en/articles/9260256-chatgpt-capabilities-overview.

1093. Attached as Exhibit 1116 is a true and correct copy of the produced document bearing Bates NYT_00467379.

1094. Attached as Exhibit 1117 is a true and correct copy of the produced document bearing Bates NYT_01034148.

1095. Attached as Exhibit 1118 is a true and correct copy of Ex. 4 to the Deposition of Hannah Poferl 30(b)(6).

1096. Attached as Exhibit 1119 is a true and correct copy of Ex. 10 to the Deposition of Hannah Poferl 30(b)(6).

1097. Attached as Exhibit 1120 is a true and correct copy of the produced document bearing Bates NYT_00692284.

1098. Attached as Exhibit 1121 is a true and correct copy of "News Sites Are Getting Crushed by Google's New AI Tools," The Wall Street Journal, https://www.wsj.com/tech/ai/google-ai-news-publishers-7e687141.

1099. Attached as Exhibit 1122 is a true and correct copy of "Business Insider goes 'all-in on AI,' laying off 21% of staff," Yahoo Finance, https://finance.yahoo.com/news/business-insider-goes-ai-laying-151220359.html.

1100. Attached as Exhibit 1123 is a true and correct copy of "Washington Post Lays Off More than 300 Journalists," The New York Times, https://www.nytimes.com/2026/02/04/business/media/washington-post-layoffs.html.

1101. Attached as Exhibit 1124 is a true and correct copy of Brad Smith, "Technology and the Free Press: The Need for Healthy Journalism in a Healthy Democracy," Microsoft On the Issues Blog (March 12, 2021), https://blogs.microsoft.com/on-the-issues/2021/03/12/technology-and-the-free-press-the-need-for-healthy-journalism-in-a-healthy-democracy/.

1102. Attached as Exhibit 1125 is a true and correct copy of Feb. 27, 2026 Emails Between Craig Smyser and Nick Goldberg.

1103. Attached as Exhibit 1126 is a true and correct copy of the produced documents bearing Bates DNP-00000994-1186; DNP-00001332-1338.

1104. Attached as Exhibit 1127 is a true and correct copy of the produced document bearing Bates DNP-00532268-275.

1105. Attached as Exhibit 1128 is a true and correct copy of the produced document bearing Bates DNP-00477963.

1106. Attached as Exhibit 1129 is a true and correct copy of the produced document bearing Bates DNP-00478215.

1107. Attached as Exhibit 1130 is a true and correct copy of the produced document bearing Bates DNP-00477879.

1108. Exhibit 1131 was intentionally omitted.

1109. Exhibit 1132 was intentionally omitted.

1110. Exhibit 1133 was intentionally omitted.

1111. Attached as Exhibit 1134 is a true and correct copy of a capture of the webpage available at https://www.ziffdavis.com/terms-of-use from Oct. 18, 2023.

1112. Attached as Exhibit 1135 is a true and correct copy of Common Crawl 2013 Form 990-PF.

1113. Attached as Exhibit 1136 is a true and correct copy of Common Crawl 2014 Form 990-PF.

1114. Attached as Exhibit 1137 is a true and correct copy of a capture of the webpage available at https://nonint.com/2023/06/10/the-it-in-ai-models-is-the-dataset/.

1115. Attached as Exhibit 1138 is a true and correct copy of OpenAI's Supp. Response to News Plaintiffs' Joint RFA No. 275.

1116. Exhibit 1139 was intentionally omitted.

1117. Attached as Exhibit 1140 is a true and correct copy of Microsoft's Sept. 12, 2025 Second Supplemental Responses and Objections to DNP's Second Set of Interrogatories.

1118. Exhibit 1141 was intentionally omitted.

1119. Attached as Exhibit 1142 is a true and correct copy of a capture of the webpage available at https://techcommunity.microsoft.com/blog/fasttrackforazureblog/grounding-llms/3843857.

1120. Attached as Exhibit 1143 is a true and correct copy of OpenAI's Response to NYT Interrogatory 24.

1121. Attached as Exhibit 1144 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001657091.

1122. Attached as Exhibit 1145 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000455566.

1123. Exhibit 1146 was intentionally omitted.

1124. Attached as Exhibit 1147 is a true and correct copy of Elbio Abib Deposition Ex. 8.

1125. Attached as Exhibit 1148 is a true and correct copy of Dr. John Lafferty's Reply Report.

1126. Attached as Exhibit 1149 is a true and correct copy of OpenAI Supplemental Response to Daily News Interrogatory No. 9.

1127. Attached as Exhibit 1150 is a true and correct copy of Ex. 10 to the Deposition of Rohit Ramchandani.

1128. Attached as Exhibit 1151 is a true and correct copy of Ex. 11 to the Deposition of Rohit Ramchandani.

1129. Attached as Exhibit 1152 is a true and correct copy of the produced document bearing Bates Sandhaus_00000095.

1130. Attached as Exhibit 1153 is a true and correct copy of the produced document bearing Bates LDC-NYT_000033.

1131. Attached as Exhibit 1154 is a true and correct copy of OpenAI's Response to The Intercept's Fourth Set of Requests for Admission (Sept. 15, 2025).

1132. Attached as Exhibit 1155 is a true and correct copy of OpenAI's Response to The Intercept's Third Set of Requests for Admission (July 14, 2025).

1133. Attached as Exhibit 1156 is a true and correct copy of OpenAI's Supplemental Response to Intercept Interrogatory No. 7 (Mar. 23, 2026).

1134. Attached as Exhibit 1157 is a true and correct copy of Dr. Emily Wenger's Opening Report Appendix 29.

1135. Attached as Exhibit 1158 is a true and correct copy of Dr. Emily Wenger's Opening Report Appendix 31.

1136. Attached as Exhibit 1159 is a true and correct copy of Dr. Emily Wenger's Opening Report Appendix 33.

1137. Exhibit 1160 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 191, which was submitted to the Court via hard drive.

1138. Exhibit 1161 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 192, which was submitted to the Court via hard drive.

1139. Exhibit 1162 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 193, which was submitted to the Court via hard drive.

1140. Exhibit 1163 is a true and correct copy of Dr. Emily Wenger's Supplemental Rep. Appendix 194, which was submitted to the Court via hard drive.

1141. Exhibit 1164 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 195, which was submitted to the Court via hard drive.

1142. Exhibit 1165 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 196, which was submitted to the Court via hard drive.

1143. Exhibit 1166 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 197, which was submitted to the Court via hard drive.

1144. Attached as Exhibit 1167 is a true and correct copy of Dr. Sanjay Krishnan's Rebuttal to Delorey Report.

1145. Attached as Exhibit 1168 is a true and correct copy of Dr. John Lafferty's Sur-Reply Report.

1146. Exhibit 1169 was intentionally omitted.

1147. Exhibit 1170 is a true and correct copy of CIR Copilot ConvoID Table, which was submitted to the Court via hard drive.

1148. Attached as Exhibit 1171 is a true and correct copy of Dr. Barbara Frederiksen-Cross's Rebuttal Report.

1149. Exhibit 1172 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 198, which was submitted to the Court via hard drive.

1150. Exhibit 1173 is a true and correct copy of Dr. Emily Wenger's Supplemental Report Appendix 199, which was submitted to the Court via hard drive.

1151. Exhibit 1174 is a true and correct copy of Dr. Emily Wenger'sSupplemental Report Appendix 201, which was submitted to the Court via hard drive.

1152. Attached as Exhibit 1175 is a true and correct copy of "How to evolve your organic approach for the rise of answer engines," Search Engine Land, October 9, 2024, https://searchengineland.com/evolve-organic-approach-answer-engines-447352.

1153. Attached as Exhibit 1176 is a true and correct copy of the produced document with Bates BCG_OPCO_MDL_000003619.

1154. Attached as Exhibit 1177 is a true and correct copy of "Reinventing search with a new AI-powered Microsoft Bing and Edge, your copilot for the web", Microsoft (Feb. 7, 2023), https://blogs.microsoft.com/blog/2023/02/07/reinventing-search-with-a-new-ai-powered-microsoft-bing-and-edge-your-copilot-for-the-web/.

1155. Attached as Exhibit 1178 is a true and correct copy of "OpenAI says it's building a tool to let content creators 'opt out' of AI training," TechCrunch (May 7, 2024), https://techcrunch.com/2024/05/07/openai-says-its-building-a-tool-to-let-content-creators-opt-out-of-ai-training/.

1156. Attached as Exhibit 1179 is a true and correct copy of a capture of the webpage available at https://openai.com/index/approach-to-data-and-ai/#were-building-media-manager-so-content-owners-can-manage-how-their-works-are-used-in-ai.

1157. Attached as Exhibit 1180 is a true and correct copy of "There Is No A.I." The New Yorker, https://www.newyorker.com/science/annals-of-artificial-intelligence/there-is-no-ai.

1158. Exhibit 1181 was intentionally omitted.

1159. Attached as Exhibit 1182 is a true and correct copy of Sam Altman Testimony U.S. Senate Judiciary Committee Subcommittee on Privacy, Technology and the Law, "Oversight of A.I.: Rules for Artificial Intelligence," https://www.techpolicy.press/transcript-senate-judiciary-subcommittee-hearing-on-oversight-of-ai/.

1160. Attached as Exhibit 1183 is a true and correct copy of OpenAI Memo (Feb. 12, 2026), https://assets.bwbx.io/documents/users/iqjWHBFdfxIU/rRmql_jJcxb4/v0.

1161. Attached as Exhibit 1184 is a true and correct copy of United States v. Google, Case No. 20-cv-3010, U.S. District Court for the District of Columbia, Transcript of Remedies Hearing, Apr. 22, 2025.

1162. Attached as Exhibit 1185 is a true and correct copy of a capture of the webpage available at https://openaiglobalaffairs.substack.com/p/a-different-path-on-local-news.

1163. Attached as Exhibit 1186 is a true and correct copy of Deck, Andrew, "Sam Altman backs "micropayment" model for AI agents to compensate publishers," NiemanLab, https://www.niemanlab.org/2026/05/sam-altman-backs-micropayment-model-for-ai-agents-to-compensate-publishers.

1164. Attached as Exhibit 1187 is a true and correct copy of Giovanni Puccetti et al., "AI 'News' Content Farms Are Easy to Make and Hard to Detect: A Case Study in Italian," Proceedings

of the 62nd Annual Meeting of the Association for Computational Linguistics (Volume 1: Long Papers), https://doi.org/10.18653/v1/2024.acl-long.817.

1165. Attached as Exhibit 1188 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000481019.

1166. Attached as Exhibit 1189 is a true and correct copy of Knibbs, Kate. "Confessions of an AI Clickbait Kingpin." Wired, February 7, 2024. https://www.wired.com/story/confessions-of-an-ai-clickbaitkingpin/.

1167. Attached as Exhibit 1190 is a true and correct copy of "Sad Milestone: Fake Local News Sites Now Outnumber Real Local Newspaper Sites in U.S." NewsGuard, June 11, 2024. https://www.newsguardtech.com/press/sadmilestone-fake-local-news-sites-now-outnumber-real-local-newspaper-sites-in-u-s/.

1168. Attached as Exhibit 1191 is a true and correct copy of Adami, Marina. "AI-Generated Slop Is Quietly Conquering the Internet. Is It a Threat to Journalism or a Problem That Will Fix Itself? | Reuters Institute for the Study of Journalism." November 26, 2024. https://reutersinstitute.politics.ox.ac.uk/news/ai-generated-slop-quietly-conquering-internet-it-threat-journalism-or-problem-will-fix-itself.

1169. Attached as Exhibit 1192 is a true and correct copy of Ex. 5 to the Deposition of Miles Brundage.

1170. Attached as Exhibit 1193 is a true and correct copy of the produced document bearing Bates OPCO_MDL_001816273.

1171. Attached as Exhibit 1194 is a true and correct copy of the transcript of the Deposition of Sarah Bird.

1172. Attached as Exhibit 1195 is a true and correct copy of Dupré, Maggie Harrison, "Amid New York Times Lawsuit, ChatGPT Is Citing Plagiarized Versions of NYT Articles on an Armenian Content Mill." Futurism (Aug. 1, 2024), https://futurism.com/chatgpt-plagiarized-nyt-articles.

1173. Exhibit 1196 was intentionally omitted.

1174. Attached as Exhibit 1197 is a true and correct copy of "How I Built an AI-Powered, Self-Running Propaganda Machine for $105," The Wall Street Journal, https://www.wsj.com/politics/how-i-built-an-ai-powered-self-running-propaganda-machine-for-105-e9888705.

1175. Attached as Exhibit 1198 is a true and correct copy of the produced document bearing Bates DNP-00535512.

1176. Attached as Exhibit 1199 is a true and correct copy of the produced document bearing Bates DNP-00363917.

1177. Attached as Exhibit 1200 is a true and correct copy of Rick Harrison, Study: People Often Trust Fake Local News Sites More Than Real Ones; Yale Political Scientist Warns of Growing Influence of AI-Driven 'Pink-Slime' News, Yale University: Institution for Social and Policy Studies (Sept. 16, 2025), https://isps.yale.edu/news/blog/2025/09/study-people-often-trust-fake-local-news-sites-more-than-real-ones-yale-political.

1178. Attached as Exhibit 1201 is a true and correct copy of Kreps, Sarah, R. Miles McCain, and Miles Brundage. "All the News That's Fit to Fabricate: AI-Generated Text as a Tool of Media Misinformation." Journal of Experimental Political Science 9, no. 1 (2020): 104–17. https://doi.org/10.1017/XPS.2020.37.

1179. Attached as Exhibit 1202 is a true and correct copy of the produced document bearing Bates OPCO_MDL_004589848.

1180. Attached as Exhibit 1203 is a true and correct copy of Dr. Avi Goldfarb's Deposition Exhibit 10.

1181. Attached as Exhibit 1204 is a true and correct copy of "Prism Media Launches Prism News, an AI-Native Publishing Platform Operating More than 200 Niche Publications Nationwide," TMX Newsfile (May 26, 2026), https://www.newsfilecorp.com/release/298739/Prism-Media-Launches-Prism-News-an-AINative-Publishing-Platform-Operating-More-Than-200-Niche-Publications-Nationwide.

1182. Attached as Exhibit 1205 is a true and correct copy of "More than 200 AI-generated 'local news' sites just went dark," Poynter (Aug. 18, 2026), https://www.poynter.org/commentary/2026/prism-news-local-news-ai-fake-shuts-down/.

1183. Attached as Exhibit 1206 is a true and correct copy of "digitalDrummer Calls Out AI Content Scraping," digitalDrummer (July 25, 2026), digitalDrummer calls out AI content scraping – digitalDrummer.

1184. Attached as Exhibit 1207 is a true and correct copy of Jaźwińska, K., & Chandrasekar, A. AI Search Has a Citation Problem. Tow Center for Digital Journalism, Columbia Journalism Review. March 6, 2025.

1185. Attached as Exhibit 1208 is a true and correct copy of Bridgman, Aengus, and Taylor Owen. AI News Audit: AI, Canadian Journalism, and Paths for Policy Action. Centre for Media, Technology and Democracy, 2026. https://www.mediatechdemocracy.com/all-work/ai-canadian-journalism-and-paths-for-policy-action.

1186. Attached as Exhibit 1209 is a true and correct copy of "Ex-OpenAI engineer who raised legal concerns about the technology he helped build has died," AP News, https://apnews.com/article/openai-whistleblower-suchir-balaji-death-283e70b31d34ebb71b62e73aafb56a7d.

1187. Attached as Exhibit 1210 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000388803.

1188. Attached as Exhibit 1211 is a true and correct copy of "Why Language Models Hallucinate," Arxiv, September 4, 2025, https://arxiv.org/pdf/2509.04664.

1189. Attached as Exhibit 1212 is a true and correct copy of the produced document bearing Bates DNP-00569563.

1190. Attached as Exhibit 1213 is a true and correct copy of the produced document bearing Bates DNP-00543997.

1191. Attached as Exhibit 1214 is a true and correct copy of the produced document bearing Bates NYT_01018244.

1192. Attached as Exhibit 1215 is a true and correct copy of Chapekis, A., and Lieb, A., "Google users are less likely to click on links when an AI summary appears in the results," Pew Research, July 22, 2025, https://www.pewresearch.org/short-reads/2025/07/22/google-users-are-less-likely-to-click-on-links-when-an-ai-summary-appears-in-the-results/.

1193. Attached as Exhibit 1216 is a true and correct copy of Chapekis, A., and Lieb, A., "Google users are less likely to click on links when an AI summary appears in the results," Pew Research, July 22, 2025, https://www.pewresearch.org/short-reads/2025/07/22/google-users-are-less-likely-to-click-on-links-when-an-ai-summary-appears-in-the-results/.

1194. Attached as Exhibit 1217 is a true and correct copy of Sinnreich NYT Opening Rep.

1195. Attached as Exhibit 1218 is a true and correct copy of Sinnreich ZD Opening Rep.

1196. Attached as Exhibit 1219 is a true and correct copy of "Google is using content from publishers who "opt out" of other AI training to power AI Overviews," Nieman Labs, May 5, 2025, https://www.niemanlab.org/2025/05/google-is-using-content-from-publishers-who-opt-out-of-other-ai-training-to-power-ai-overviews/.

1197. Attached as Exhibit 1220 is a true and correct copy of "How Google's AI Overviews Work, and How to Turn Them Off (You Can't)," Wired, May 16, 2024, https://www.wired.com/story/google-ai-overviews-how-to-use-how-to-turn-off/.

1198. Attached as Exhibit 1221 is a true and correct copy of "ChatGPT reaches 900M weekly active users," Techcrunch, https://techcrunch.com/2026/02/27/chatgpt-reaches-900m-weekly-active-users/.

1199. Attached as Exhibit 1222 is a true and correct copy of Microsoft's 2025 Schedule 14A, https://www.sec.gov/Archives/edgar/data/789019/000119312525245150/d908201ddef14a.htm#:~:text=%20Proxy%20Statement%20.

1200. Attached as Exhibit 1223 is a true and correct copy of Microsoft's Exhibit 99.1 (July 29, 2026), https://www.sec.gov/Archives/edgar/data/789019/000119312526323632/msft-ex99_1.htm.

1201. Attached as Exhibit 1224 is a true and correct copy of "Ex-OpenAI engineer who raised legal concerns about the technology he helped build has died," AP News (Dec. 21, 2024), https://apnews.com/article/openai-whistleblower-suchir-balaji-death-283e70b31d34ebb71b62e73aafb56a7d.

1202. Attached as Exhibit 1225 is a true and correct copy of "When does generative AI qualify for fair use?", Suchir Balaji (Oct. 23, 2024), https://suchir.net/fair_use.html.

1203. Attached as Exhibit 1226 is a true and correct copy of Cade Metz, "Former OpenAI Researcher Says the Company Broke Copyright Law," The New York Times (Oct. 23, 2024), https://www.nytimes.com/2024/10/23/technology/openai-copyright-law.html.

1204. Attached as Exhibit 1227 is a true and correct copy of Microsoft 365, "Last-minute meeting invite? Microsoft 365 Copilot Chat helps you create agendas quickly…" LinkedIn, May 2025, https://www.linkedin.com/posts/microsoft-365_draft-meeting-agendas-anytime-anywhere-activity-7323793020196147202-zWPf/.

1205. Attached as Exhibit 1228 is a true and correct copy of Aaron Chatterji, et. al., "How People Use ChatGPT," OpenAI (Sep. 15, 2025), https://cdn.openai.com/pdf/a253471f-8260-40c6-a2cc-aa93fe9f142e/economic-research-chatgpt-usage-paper.pdf.

1206. Attached as Exhibit 1229 is a true and correct copy of "ChatGPT's Search Market Share Up 740% in Just 12 Months," Opollo, May 31, 2025, https://opollo.com/blog/chatgpts-search-market-share-has-exploded-by-740-in-just-12-months/.

1207. Attached as Exhibit 1230 is a true and correct copy of "ChatGPT Surges Ahead in the Battle for Search Marketing Share," Driving Influence, November 21, 2024, https://avenuez.com/blog/chatgpt-surges-ahead-in-the-battle-for-search-marketing-share/.

1208. Attached as Exhibit 1231 is a true and correct copy of "Google vs ChatGPT Market Share: 2026 Report," First Page Sage, https://firstpagesage.com/seoblog/google-vs-chatgpt-market-share-report/.

1209. Attached as Exhibit 1232 is a true and correct copy of "Global Public Opinion on Artificial Intelligence (GPO-AI)," Schwartz Reisman Institute for Technology and Society (SRI), supported by the Policy, Elections and Representation Lab (PEARL) at the Munk School of Global Affairs & Public Policy at the University of Toronto, May 17, 2024, https://utoronto.sharepoint.com/sites/ArtSci-SRI-External/Documents/Forms/AllItems.aspx?id=%2Fsites%2FArtSci%2DSRI%2DExternal%2FDocuments%2FGPO%2DAI%5FFinal%20Version%5FMay%2027%5Fupdated%2Epdf&parent=%2Fsites%2FArtSci%2DSRI%2DExternal%2FDocuments&p=true&ga=.

1210. Attached as Exhibit 1233 is a true and correct copy of *U.S. et al. v. Google LLC*, Nadella Trial Testimony, Day 14 Morning Session.

1211. Attached as Exhibit 1234 is a true and correct copy of the produced document bearing Bates NYT_00832517.

1212. Attached as Exhibit 1235 is a true and correct copy of the produced document bearing Bates DNP-00633129.

1213. Attached as Exhibit 1236 is a true and correct copy of a webpage "Introducing ChatGPT Health," OpenAI (Jan. 7, 2026), https://openai.com/index/introducing-chatgpt-health/.

1214. Attached as Exhibit 1237 is a true and correct copy of a webpage "Health," The New York Daily News, https://www.nydailynews.com/news/health/.

1215. Attached as Exhibit 1238 is a true and correct copy of a webpage "Health", The Chicago Tribune, https://www.chicagotribune.com/news/health/.

1216. Attached as Exhibit 1239 is a true and correct copy of a webpage "Well," The New York Times, https://www.nytimes.com/section/well.

1217. Attached as Exhibit 1240 is a true and correct copy of Ziff Davis 2025 10K.

1218. Attached as Exhibit 1241 is a true and correct copy of the produced document bearing Bates NYT_00832494.

1219. Attached as Exhibit 1242 is a true and correct copy of the produced document bearing Bates DNP-00535393.

1220. Attached as Exhibit 1243 is a true and correct copy of the produced document bearing Bates DNP-00366826.

1221. Attached as Exhibit 1244 is a true and correct copy of the produced document bearing Bates DNP-00626843.

1222. Attached as Exhibit 1245 is a true and correct copy of "Tracking AI-enabled Misinformation: 3,749 AI Content Farm sites (and Counting), Plus the Top False Claims Generated by Artificial Intelligence Tools", NewsGuard, June 23, 2026, https://www.newsguardtech.com/special-reports/ai-tracking-center/.

1223. Attached as Exhibit 1246 is a true and correct copy of the produced document bearing Bates NYT_01072776.

1224. Attached as Exhibit 1247 is a true and correct copy of the produced document bearing Bates DNP-00569555.

1225. Attached as Exhibit 1248 is a true and correct copy of "A Different Path on Local News," OpenAI Global Affairs, https://openaiglobalaffairs.substack.com/p/a-different-path-on-local-news.

1226. Attached as Exhibit 1249 is a true and correct copy of a capture of the webpage available at http://web.archive.org/web/20230922085732/https://tribunecontentagency.com/us/.

1227. Attached as Exhibit 1250 is a true and correct copy of the produced document bearing Bates DNP_00597371.

1228. Exhibit 1251 was intentionally omitted.

1229. Exhibit 1252 was intentionally omitted.

1230. Attached as Exhibit 1253 is a true and correct copy of the produced document bearing Bates OPCO_MDL_000495790.

1231. Attached as Exhibit 1254 is a true and correct copy of Exhibit 13 to the deposition of Times employee Hannah Yang.

1232. Attached as Exhibit 1255 is a true and correct copy of the Rule 30(b)(1) deposition transcript of Times employee Hannah Yang.

1233. Attached as Exhibit 1256 is a true and correct copy of Exhibit 10 to the deposition of OpenAI employee Ben Gaffney.

1234. Exhibit 1257 was intentionally omitted.

1235. Attached as Exhibit 1258 is a true and correct copy of a produced document bearing Bates MSFT_AI_MDL_000211987.

1236. Attached as Exhibit 1259 is a true and correct copy of a produced document bearing Bates OPCO_MDL_004602292.

1237. Attached as Exhibit 1260 is a true and correct copy of a produced document bearing Bates LDC_NYT_000046.

1238. Attached as Exhibit 1261 is a true and correct copy of a produced document bearing Bates OPCO_OAI_OUTPUT00006728.

1239. Attached as Exhibit 1262 is a true and correct copy of a capture of the webpage available at https://www.pulitzer.org/prize-winners-by-year/1993.

1240. Attached as Exhibit 1263 is a true and correct copy of the produced document bearing Bates DNP_00534490.

1241. Attached as Exhibit 1264 is a true and correct copy of the January 8, 2024 article on OpenAI's website titled "OpenAI and Journalism", https://openai.com/index/openai-and-journalism/.

1242. Attached as Exhibit 1265 is a true and correct copy of Exhibit 6 to the February 27, 2026 deposition of Microsoft employee Rob Cromwell.

1243. Exhibit 1266 was intentionally omitted.

1244. Attached as Exhibit 1267 is a true and correct copy of Common Crawl 2024 Form 990-PF.

1245. Attached as Exhibit 1268 is a true and correct copy of the produced document bearing Bates MSFT_AI_MDL_000665167.

1246. Attached as Exhibit 1269 is a true and correct copy of the February 25, 2026 30(b)(6) Deposition Transcript of Karen Oh.

1247. Attached as Exhibit 1270 is a true and correct copy of the 30(b)(1) Deposition Transcript of Lindsey Turrentine.

1248. Attached as Exhibit 1271 is a true and correct copy of Jaźwińska, K., & Chandrasekar, How ChatGPT Search Mis(represents) Publisher Content, November 27, 2024, https://www.cjr.org/tow_center/how-chatgpt-misrepresents-publisher-content.php.

1249. Exhibit 1272 is a true and correct copy of Dr. Emily Wenger's Opening Report Appendix 190, which was submitted to the Court via hard drive.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Los Angeles, California on September 17, 2026.

/s/ Davida Brook
Davida Brook