UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: Case No. 1:23-cv-08292 (SHS) (OTW) Case No. 1:23-cv-10211 (SHS) (OTW)	1:25-md-03143 (SHS) (OTW) Hon. Sidney H. Stein Hon. Ona T. Wang **NOTICE OF MOTION** **ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the undersigned hereby move this Court on behalf of Defendants OpenAI and Microsoft Corporation ("Defendants"), by and through counsel, before the Honorable Sidney H. Stein, United States District Judge for the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 23A, New York, New York 10007-1312, for an order granting Defendants' Motion to Strike Susman Godfrey L.L.P.-Funded Study and Supplemental Report of Michael Lasinski pursuant to Federal Rules of Civil Procedure 26 and 37.

Respectfully submitted,[1]

KEKER, VAN NEST & PETERS LLP

Dated: September 23, 2026

By: */s/ Victor Chiu*

[1] All parties whose electronic signatures are included herein have consented to the filing of this document.

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Dated: September 23, 2026

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