UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: OpenAI, Inc. Copyright Infringement Litigation This Document Relates To: No. 1:23-cv-08292 No. 1:23-cv-10211 No. 1:23-cv-11195 No. 1:24-cv-03285 No. 1:24-cv-04872 No: 1:24-cv-01515 No: 1:25-cv-04315	Case No. 1:25-md-3143 (SHS) (OTW)

DEFENDANTS' NOTICE OF MOTION AND RULE 702 MOTION TO EXCLUDE EXPERT TESTIMONY

PLEASE TAKE NOTICE that upon this Motion and the accompanying (1) Memorandum of Law in Support of Defendants' Rule 702 Motion to Exclude Expert Testimony,[1] (2) the Declaration of Paven Malhotra in Support of Defendants' Rule 702 Motion to Exclude Expert Testimony and the exhibits attached thereto, (3) the Declaration of On Amir, Ph.D., in Support of Defendants' Rule 702 Motion to Exclude Expert Testimony and the exhibits attached thereto, (4) the Declaration of Padma Gaggara in Support of Defendants' Rule 702 Motion to Exclude Expert Testimony and the appendix attached thereto, and (5) the Declaration of Fabrice Canel in Support of Defendants' Rule 702 Motion to Exclude Expert Testimony, all filed concurrently herewith, the undersigned will, and hereby do, move this Court on behalf of Defendants Microsoft and OpenAI, before the Honorable Sydney H. Stein in Courtroom 23A of the United

[1] This motion relates to all currently active cases in the MDL as listed in the caption above. Microsoft is not a party to the actions brought by Ziff Davis (No: 1:25-cv-04315) nor The Intercept (No: 1:24-cv-01515), nor to any claims asserted under 17 U.S.C. § 1202 for CMI removal, and therefore does not join as to opinions pertaining exclusively to those matters.

States District Court for the Southern District of New York, Daniel Patrick Moyniham Courthouse, 500 Pearl Street, New York, New York, 10007, on a date and at a time to be set by the Court, for an order pursuant to Federal Rule of Evidence 702 excluding the opinions and testimony of Plaintiffs' various experts identified in the below chart (**Table 1**), and granting such other relief as the Court deems just and proper.

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TABLE 1

Books Plaintiffs' Expert	Document/Testimony Defendants Move to Exclude Pursuant to F.R.E. 702	Specific Sections or Paragraphs Defendants Move to Exclude Pursuant to F.R.E. 702
Mr. Michael Lasinski[2]	Lasinski Decl., Ex. A - Opening Report (4/24/26) [ECF No. 1825][3]	Section 2.0 (second-to-last bullet in ¶ 14) Section 6.3 (¶¶ 208, 211, 214) Section 6.4 (last bullet point in ¶ 215)
	Lasinski Decl., Ex. B - Rebuttal Report (5/24/26) [ECF No. 1825]	Section 2.1 (last sentence of ¶ 10) Section 2.2 (last sentence of ¶ 12) Section 2.5 (third bullet of ¶ 16 starting with "Plaintiffs have been harmed…") Entire Sections 9.0 to 9.6 (¶¶ 362-412) Entire Section 9.7.1 (¶¶ 414-419) Section 9.7.5 (the last two sentences of ¶442)
	Lasinski Decl., Ex. C - Reply Report (6/26/26) [ECF No. 1825]	Section 2.4 (bullet points 5-8 in ¶ 12) Entire Sections 6.0 to 6.5 (¶¶ 77-109)

[2] Lasinski also offered opinions on damages. Should Books Plaintiffs prevail on the merits of any of their claims, Defendants reserve the right to challenge those damages opinions on at least the following grounds: his failure to assess causation in any but-for analysis; his improper hypothetical license analysis; and his improper recitation and narration of extensive record evidence without any expert analysis.

[3] All ECF citations are to the version of the expert report that was filed by Plaintiffs under seal.

	Lasinski Decl., Ex. D - Supplemental Report (8/2/26) [ECF No. 1825]	Entire Report
Mr. Mark Seeley	Seeley Decl., Ex. A - Opening Report (4/24/26) [ECF No. 1804]	Section I (¶ 4) Section IV (¶¶ 13-15) Entire Section VI (¶¶ 36-52) Entire Section VII (¶¶ 53-62) Entire Section VIII (¶¶ 63-76)
	Seeley Decl., Ex. B - Rebuttal Report (5/24/26) [ECF No. 1804]	Section I (¶¶ 3-4) Section IV(a) (¶¶ 14-21) Entire Section IV(c) (¶¶ 41-46)
	Seeley Decl., Ex. C - Reply Report (6/26/26) [ECF No. 1804]	Entire Section I (¶¶ 3-7) Section IV (¶¶ 13-47) Entire Section V (¶¶ 48-70)
Dr. Ben Zhao	Zhao Decl., Ex. A - Opening Report [ECF No. 1787]	Section II (¶¶ 7-8) Entire Section III (¶12) Entire Section IV (¶¶14-72) Entire Section V (¶¶73-81)
	Zhao Decl., Ex. B - Rebuttal Report (5/24/26) [ECF No. 1787]	Section III (¶12(a), (c), (d), (f)) Entire Section IV.A Section IV. B (¶¶ 15-17, 23-35, 38-41, last sentence of ¶43, ¶44 (“reduce the distance between the model representation and ideal compressed representation of the training data”), ¶¶ 49-52

		Section IV. C (Last sentence of ¶54) Section IV. E (¶¶62-69) Entire Section IV.F Section IV. G (last sentence of ¶79) Entire Section IV.H (¶¶ 80-82) Entire Section V.B (¶¶ 92-98) Section VI (¶¶ 103-111) Entire Section VII
	Zhao Decl., Ex. C - Reply Report (6/26/26) [ECF No. 1787]	Section III (¶ 5) Section IV (¶¶ 9-11, 13-15) Entire Section V. A (¶¶ 17-19) Entire Section V.B (¶¶ 20-24) Entire Section V.C (¶¶ 25-31) Entire Section V.F. (¶ 36)

News Plaintiffs' Expert	Parties for Whom Expert Offers Opinions	Document/Testimony Defendants Move to Exclude Pursuant to F.R.E. 702	Specific Sections or Paragraphs Defendants Move to Exclude Pursuant to F.R.E. 702
Ms. Emily Bell	The New York Times	Bell Decl., Ex. A - Opening Report (4/24/26) [ECF No. 1794]	Section IV (¶¶ 34-37) Section VI (¶¶ 79-81) Entire Section VII (¶¶ 112-151) Entire Section VIII (¶¶ 152-170)
		Bell Decl., Ex. B - Rebuttal Report (5/24/26) [ECF No. 1794]	Section V (¶¶ 25-27, 29) Section VI (¶¶ 31-34, 36, 39-40, 41-43, 59, 64, 66, 78, 79, 81, 82, 88, 90-92, 98, 103-106, 108-121) Section VII (¶¶ 140-144, 147-149, 156, 158) Section VIII (¶¶ 185–186, 190, 193, 196, 198, 201) Entire Section IX.B (¶¶ 206-214) Exhibits B and C
		Malhotra Decl., Ex. 53 - Bell Reply Report (6/26/26)	Section V (¶ 15) Section VI (¶¶ 22–23, 33, 39, 55, 57–59)

Ms. Sue Cross	CIR; The Intercept	Cross Decl., Ex. A - Rebuttal Report (5/24/26) [ECF No. 1821]	Section I (¶¶ 2, 4) Section VII (pg. 16-20) Section VIII (pg. 20-29) Section XI.H (pg. 42) Section X (pg. 31-34) Section XI.G (pg. 41-42)
Mr. Daniel Delorey	Ziff Davis	Delorey Decl., Ex. A - Opening Report (4/24/26) [ECF No. 1774]	Section 5 (¶¶ 22-35) Section 11 (¶¶ 254-76) Entire Section 10 (¶¶ 164-222) Entire Section 12 (¶¶ 277-323) Entire Section 13 (¶¶ 324-51)
		Delorey Decl., Ex. B - Rebuttal Report (5/24/26) [ECF No. 1774]	Sections 4 (¶ 19) Section 5 (¶ 29) Section 11 (¶¶ 115, 118)
		Delorey Decl., Ex. C - Reply Report (6/26/26) [ECF No. 1774]	Sections 4 (¶¶ 15-21) Section 7 (¶¶ 43, 47-58) Section 8 (¶¶ 59-82) Entire Section 6 (¶¶ 22-39) Entire Section 9 (¶¶ 110-19)

		Delorey Decl., Ex. D – Supplemental Report (9/3/26) [ECF No. 1774]	Entire Report
Dr. Oren Etzioni	The New York Times; Daily News Plaintiffs	Etzioni Decl., Ex. A - Opening Report (4/24/26) [ECF No. 1806]	Entire Section VIII.A (¶¶ 71-97) Entire Section VIII.B (¶¶ 98-122)
		Etzioni Decl., Ex. B - Rebuttal Report (5/29/26) [ECF No. 1806]	Entire Section XI.E.4 (¶¶ 311-315)
Dr. Thomas Goldstein	The New York Times; Daily News Plaintiffs	Goldstein Decl., Ex. A - Opening Report (4/24/26) [ECF No. 1819]	Section V (¶¶ 58-60, 62-64) Entire Section X (¶¶ 260-292) Section XI (¶¶ 293-96) Entire Section XI.B (¶¶ 308-331) Section XII. B (¶¶ 393-98, 400-18) Section XII.D (¶¶ 452-470) Entire Section XIII (¶¶ 516-546) Entire Section XIV (¶¶ 547-66)
		Goldstein Decl., Ex. B - Rebuttal Report (5/24/26) [ECF No. 1819]	Section V (¶¶ 36-40, 43) Section VI.B (¶¶ 77-79, 82-85, 87)

			Entire Section VII.A (¶¶ 96-101) Section VIII.A.1 (¶¶ 109-120) Entire Section X.C (¶¶ 223-261) Entire Section XI.B (¶¶ 266-67)
		Goldstein Decl., Ex. C - Reply Report (6/26/26) [ECF No. 1819]	Entire Section IV.A (¶¶ 16-94) Entire Section IV.B (¶¶ 95-161) Entire Section VII (¶¶ 233-248) Entire Section VIII.A (¶¶ 250-53)
		Goldstein Decl., Ex. D - Supplemental Report (7/14/26) [ECF No. 1819]	Entire Section IV.B (¶¶ 21-49) Entire Section VI.D (¶¶ 84-89) Entire Section VI.E (¶ 90) Entire Section VII.A (¶ 91-103)
		Goldstein Decl., Ex. E – Errata to Opening Report (5/7/2026) [ECF No. 1819]	Errata (¶¶ 2, 4-5)
		Goldstein Decl., Ex. H – Errata to Supplemental Report (7/30/2026) [ECF No. 1819]	Errata (¶2)

		Goldstein Decl. (9/3/26) [ECF No. 1819]	Declaration (¶¶3-23) Entire Exhibits I-P
Dr. Johnathan Krein	Ziff Davis	Krein Decl., Ex. A - Rebuttal Report (6/23/26) [ECF No. 1769]	Section 5 (¶35) Section 6 (¶¶45, 47) Section 7 (¶¶51, 58–59, 65–78) Section 9 (¶¶86–87) Entire Appendix B (pg. 55–59) Entire Appendix C (pg. 60–87)
		Krein Decl., Ex. B - Supplemental Report (8/4/26) [ECF No. 1769]	Section 4 (¶13) Section 5 (¶¶18–21, 30–33) Bundles A–F Krein "disallow-window" CSV produced with the August 4 materials
		Krein Decl., Ex. C – Second Supplemental Report (9/3/26) [ECF No. 1769]	Section 2 (¶¶5-8) Bundles G–I Krein "disallow-window" CSV produced with the September 3 materials
Mr. James Malackowski[4]	The New York Times; Daily News Plaintiffs; Ziff Davis	Malackowski Decl., Ex. A - Opening Report	Section 4.0 (pg. 11)

[4] Should News Plaintiffs prevail on the merits of any of their claims, Defendants reserve the right

		(NYT-DN) (4/24/26) [ECF No. 1800]	Section 5.0 (pg. 21, second to last paragraph) Section 5.3 (pg. 28-29) Entire Section 5.4 (pg. 29-65) Entire Section 5.5 (pg. 65-67) Entire Section 7.1 (pg. 83-87) Entire Section 7.2.4 (pg. 96-98) Entire Section 12.2.1.2 (pg. 158-159)
		Malackowski, Decl., Ex. F – Opening Report (ZD) 94/24/26) [ECF No. 1800]	Section 4.0 (pg. 8) Section 5.0 (pg. 13) Entire Section 5.4 (pg. 24-44) Section 5.5 (pg. 44-45) Entire Section 10.3.1 (pg. 90-95)
		Malackowski Decl., Ex. B - Rebuttal Report (NYT-DN) (5/29/26) [ECF No. 1800]	Section 4.0 (pg. 5 bullets 2-4, pg. 7 bullets 2-3 and last paragraph, pg. 8

to challenge Malackowski's damages opinions on at least the following grounds: his failure to establish causal nexus for revenues he discusses as attributable to the alleged infringement, his bottom up approach to apportionment consisting of a "cost of news" calculation, the methodology of his "cost of news" lost license fee, and his use of a 50% adjustment factor in that calculation.

			bullets 1-6, pg. 8-9 last paragraph) Entire Section 5.2.2 (pg. 10-20) Entire Section 5.4.2 (pg. 26-28) Section 5.5.2 (introduction on pg. 30) Entire Section 5.5.2.1 (pg. 31-34) Entire Section 5.5.2.2 (pg. 34-35) Section 5.5.3 (introduction on pg. 37-38) Entire Section 5.5.3.3 (pg. 42-43) Entire Section 5.5.3.5 (pg. 48-49) Entire Sections 5.5.3.6 (pg. 59-51) Section 6.0 (bullets 1-3, 7 of introduction on pg. 51) Entire Section 6.1 (pg. 52-55) Entire Section 6.2 (pg. 55-59) Entire Section 6.3 (pg. 59-63) Entire Section 6.7 (pg. 84-87)

		Malackowski Decl., Ex. G - Rebuttal Report (ZD) (5/29/26) [ECF No. 1800]	Section 4.0 (pg. 4-6) Entire Section 5.5.2 (pg. 21-28) Entire Section 5.5.3.3 (pg. 33-34) Section 5.5.3.6 (Determinant C on p. 41) Entire Section 6.2 (pg. 44-47) Entire Section 6.3 (pg. 47-50)
		Malackowski Decl., Ex. C - Reply Report (NYT-DN) (6/26/26) [ECF No. 1800]	Section 4.0 (paragraphs 3-8 on pg. 7-9 and last paragraph on pg. 11) Section 5.1 (paragraphs 1-2 on pg. 11) Entire Section 5.7 (pg. 28-32) Entire Section 5.10 (pg. 37-38) Entire Section 5.14 (pg. 45-47)
		Malackowski Decl., Ex. H - Reply Report (ZD) (6/26/26) [ECF No. 1800]	Section 4.0 (p. 6 - the second paragraph on pg. 10) Section 5.1 (p. 12-the first paragraph on pg. 14) Entire Section 5.7 (pg. 26-29)

			Entire Section 5.10 (pg. 32-34)
Dr. Michael McDonald	CIR; The Intercept	McDonald Decl., Ex. A - Report (5/24/26) [ECF No. 1875]	Section I.B (pg. 6, points 1-2) Section III (pg.11-26 except first two paragraphs) Section IV (pg. 36-41, "Market 2" and "Market 3") Entire Section V.B (pg. 46-47) Section VI.B (first paragraph, pg. 52) Section VI.C (last paragraph, pg. 54) Section VI.D (last paragraph pg. 56) Entire Section VI.F. (pg. 59) Section VII.C. (last paragraph, pg. 63) Section VII.E (last paragraph, pg. 65-66) Section IX.B (paragraphs 2-3, pg. 76-77) Section IX.E. (last paragraph, pg. 81) Section X.B (last paragraph pg. 84-85)
Dr. Taylor Owen	Daily News Plaintiffs	Owen Decl., Ex. A - Opening Report	Section IV.A (¶¶ 29-30)

		(4/24/26) [ECF No. 1811]	Section IV.B (¶¶ 51-52) Entire Section IV.D (¶¶ 91-105) Section IV.F (¶ 135)
		Owen Decl., Ex. B - Rebuttal Report (5/29/26) [ECF No. 1811]	Section III (¶¶ 27, 30) Entire Section VIII (¶¶ 73-82) Section IX (¶ 85) Entire Section X (¶¶ 91-100) Entire Section XII (¶¶ 119-126)
		Owen Decl., Ex. C - Reply Report (6/26/26) [ECF No. 1811]	Section IV (¶¶ 14-19) Section VI (¶¶ 22–28) Entire Section VII (¶¶ 30-37) Entire Section VIII (¶¶ 38-45) Entire Section IX (¶¶ 46–49) Entire Section X (¶¶ 50–54)
Ms. Jessie Stricchiola	The New York Times; Daily News Plaintiffs; Ziff Davis	Stricchiola Decl., Ex. A - Opening Report (NYT-DN) (4/24/26) [ECF No. 1798]	Section VIII (¶¶ 60, 62-63) Entire Section XI (G) (¶¶ 280-307) Section XIII (¶¶ 379-449)

		Stricchiola Decl., Ex. C - Rebuttal Report (NYT-DN-ZD) (5/24/26) [ECF No. 1798]	Entire Section V(A) (¶¶ 26-32) Entire Section IX (¶¶ 111-116) Section XI (¶¶ 127-135)
		Stricchiola Decl., Ex. D - Reply Report (NYT-DN-ZD) (6/26/26) [ECF No. 1798]	Section V (¶¶ 69-114)
		Stricchiola Decl., Ex. B- Opening Report (ZD) (4/24/26) [ECF No. 1798]	Section VIII (¶¶ 60-61) Entire Section XIII (¶¶ 246-296)
Ms. Antoinette Tease	CIR; The Intercept	Tease Opening Report (4/24/26) [Malhotra Decl., Exhibit 44]	Entire Report
Dr. Emily Wenger	CIR; The Intercept	Wenger Decl., Ex. A - Opening Report (4/24/26) [ECF No. 1858]	Section I (pg. 6-8) Page 28 (last paragraph) Section III.A (pg. 32-35) Entire Section III.B (pg. 35-36) Entire Section III.C (pg. 36-48) Entire Section IV.B (pg. 53-64) Entire Section V.B (pg. 71-85)

			Entire Section V.D (pg. 87-110)
		Wenger Decl., Ex. D - Rebuttal Report (5/24/26) [ECF No. 1858]	Section II.G (pg. 25-27) Section III.B (pg. 36-37) Entire Section III.E (pg. 43-49)
		Wenger Decl., Ex. F - (Corrected) Reply Report (7/20/26) [ECF No. 1858]	Section I. (pg. 6-8) Entire Section II (pg. 8-66) Section III.B (pg. 73) Entire Section V.C (pg. 98-100) Entire Section V.E (pg. 101-105) Entire Section V.F (pg. 105-106) Entire Section VII (pg. 113-120) Entire Section VIII (pg. 120-124)
		Wenger Decl., Ex. H – (Corrected) Supplemental Report (8/18/26) [ECF No. 1858]	Entire Report

Dated: September 24, 2026

Respectfully submitted,

/s/ Lisa Simpson

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