UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re OpenAI, Inc. Copyright Infringement Litigation This Document Relates to: *The Seattle Times Co. et al. v. OpenAI Inc. et al.*, No. 1:26-cv-07644-SHS	Case No. 1:25-md-3143-SHS-OTW **JOINT STIPULATION AND ORDER STAYING *SEATTLE TIMES* ACTION**

Plaintiffs The Seattle Times Company and Newsday LLC ("Plaintiffs") and Defendants OpenAI Inc., OpenAI GP LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Group PBC, OpenAI Foundation, and Microsoft Corporation ("Defendants") (collectively, the "Parties"), hereby stipulate and agree as follows:

WHEREAS, on April 3, 2025, the United States Judicial Panel on Multidistrict Litigation ordered various actions brought against Defendants be centralized and transferred to the Southern District of New York. *In re OpenAI, Inc., Copyright Infringement Litigation*, No. 1:25-md-03143-SHS-OTW (the "MDL");

WHEREAS, on September 4, 2026, Plaintiffs filed the above-captioned case in the Southern District of New York (the "Action");

WHEREAS, on September 9, 2026, this Action was accepted as a consolidated MDL case;

WHEREAS, on September 15, 2026, this Court entered a show cause order regarding a stay of this Action "pending resolution of summary judgment motions in the other active cases in this multidistrict litigation." *See* MDL ECF No. 1964.

WHEREAS, this Action has common factual and legal issues with the pre-existing MDL

actions, such that forthcoming rulings in the MDL may address questions that overlap with questions in this Action and may inform and streamline the resolution of similar issues in this Action;

WHEREAS, the Parties agree that a finite stay of this Action will allow the existing schedule in the MDL to be maintained and promote judicial economy and consistency;

WHEREAS, by entering into this stipulation, Defendants expressly reserve any and all defenses.

NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES THAT, subject to the Court's approval, as follows:

1. All proceedings and deadlines in the above-captioned Action are hereby stayed pending resolution of summary judgment motions in the other active cases in this multidistrict litigation.

2. Within 30 days of rulings on such motion(s) in the MDL, the parties shall file a joint status report in this Action to propose a case management conference and any appropriate further proceedings in light of the MDL decision.

3. While this stay is in effect, any party may move to lift the stay for good cause shown. Nothing in this stipulation shall preclude any party from seeking such relief, if necessary, or from seeking any other appropriate relief from the Court.

Respectfully submitted,

Dated: September 25, 2026

KLARIS LAW PLLC

by: */s/ Brendan T. Kehoe*

Brendan T. Kehoe
Lacy Herman Koonce III
161 Water Street
Suite 904
New York, NY 10038
Telephone: (917) 612-5861
Email: lance.koonce@klarislaw.com
Attorneys for Plaintiffs

Dated: September 25, 2026

by: */s/ R. James Slaughter*

KEKER, VAN NEST & PETERS LLP
Robert A. Van Nest (*pro hac vice*)
rvannest@keker.com
R. James Slaughter (*pro hac vice*)
rslaughter@keker.com
Paven Malhotra
pmalhotra@keker.com
Michelle S. Ybarra (*pro hac vice*)
mybarra@keker.com
633 Battery St.
San Francisco, CA 94111
Telephone: 415.391.5400

LATHAM & WATKINS LLP
Andrew M. Gass (*pro hac vice*)
andrew.gass@lw.com
San Francisco, CA 94111
Telephone: 415.391.0600

Sarang V. Damle
sy.damle@lw.com
Luke A. Budiardjo
luke.budiardjo@lw.com
1271 Avenue of the Americas
New York, NY 10020
Telephone: 212.906.1200

Elana Nightingale Dawson (*pro hac vice*)
elana.nightingaledawson@lw.com
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Telephone: 202.637.2200

MORRISON & FOERSTER LLP
Joseph C. Gratz (*pro hac vice*)
jgratz@mofo.com
Tiffany Cheung (*pro hac vice*)
tcheung@mofo.com
Caitlin Sinclaire Blythe (*pro hac vice*)
cblythe@mofo.com
425 Market Street
San Francisco, CA 94105
Telephone: 415.268.7000

Rose S. Lee (*pro hac vice*)
roselee@mofo.com
707 Wilshire Boulevard, Suite 6000
Los Angeles, CA 90017
Telephone: 213.892.5200

Attorneys for OpenAI Defendants

Dated: September 25, 2026

by: */s/ Jared B. Briant*

ORRICK, HERRINGTON & SUTCLIFFE LLP
Annette Hurst (*pro hac vice*)
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: 415.773.5700
ahurst@orrick.com

FAEGRE DRINKER BIDDLE & REATH LLP
Jeffrey S. Jacobson
1177 Avenue of the Americas, 41st Floor
New York, New York 10036
Telephone: (212) 248-3140
Facsimile: (212) 248-3141
jeffrey.jacobson@faegredrinker.com

Attorneys for Defendant Microsoft Corporation

* All parties whose electronic signatures are included in this filing have provided consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

SO ORDERED this 28th **day of** September**, 2026.**

Hon. Sidney H. Stein
United States District Judge