UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:	:	25-md-3143 (SHS) (OTW)
OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION	:	**NOTICE OF MOTION TO INTERVENE BY BLOOMBERG INDUSTRY GROUP, INC.**
This Document Relates To: 1:23-cv-11195-SHS-OTW	:	**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Annelise Levy, the exhibits annexed thereto, and the Memorandum of Law in Support, intervenor Bloomberg Industry Group, Inc., by its attorneys George, LLP, will move this Court before the Honorable Sidney H. Stein at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007 at a date and time selected by the Court, for an Order pursuant to Fed. R. Civ. P. 24(b) to intervene in the above-captioned case for the limited purpose of (i) asking the Court to unseal all redactions made in the proposed Amended Complaint filed by Plaintiff The New York Times Company on June 25, 2026 (Dkt. No. 1415-2/1590-2) in connection with its Motion to File a Third Amended Complaint, and to unseal Exhibits A through O filed in support thereof (Dkt. Nos. 1415-4/1590-4 to Dkt. Nos. 1415-18/1590-18), (ii) to participate in the motions to seal exhibits and redact documents that were and are to be filed in connection with the parties' motions for summary judgment, and (iii) for such other further and different relief as the Court deems just and proper.

Dated: New York, New York
September 29, 2026

GEORGE LLP

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