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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	**ECF CASE** 1:25-MD-03143-SHS/OTW

DECLARATION OF DR. PARAMVEER DHILLON

I, Paramveer Dhillon, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am over the age of eighteen and, if called as a witness, could competently testify to the matters set forth herein.

2. I am an Associate Professor in the School of Information at the University of Michigan.

3. On July 22, 2026, my co-authors and I submitted a paper titled "Generative AI floods and dilutes the market for books" ("Generative AI Paper") to arXiv for publication.

4. Susman Godfrey did not fund or otherwise pay for the Generative AI Paper.

5. If Susman Godfrey had funded the Generative AI Paper, I would have disclosed it in the paper itself. But Susman Godfrey did not fund the paper.

6. Susman Godfrey provided no edits or comments on the Generative AI Paper.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 1, 2026, in Ann Arbor, Michigan.

Signed by:
/s/ Paramveer Dhillon
7EFDEBFB3199400...
Paramveer Dhillon, PhD