UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: **OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION**	**25-md-3143 (SHS) (OTW)**
THIS DOCUMENT RELATES TO: **ALL CASES**	**MOTION FOR ADMISSION PRO HAC VICE OF JOHN BERGMAYER**

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Civil Rule 1.3 of the United States District Court for the Southern District of New York, John Bergmayer respectfully moves for an order admitting him pro hac vice to appear as counsel for Public Knowledge, proposed amicus curiae, in the above-captioned litigation.

Mr. Bergmayer is an active member in good standing of the District of Columbia Bar (No. 992602). He is also admitted in Colorado (No. 41308), where his registration has been inactive since April 11, 2012. The Colorado Supreme Court certificate confirms both his good standing and inactive status. There are no pending disciplinary proceedings against him in any state or federal court; he has never been convicted of a felony; and he has never been censured, suspended, disbarred, or denied admission or readmission by any court.

This re-filing cures the deficiency identified as to Dkt. 1978. Submitted are Mr. Bergmayer's notarized affidavit, the District of Columbia certificate dated September 17, 2026, the Colorado Supreme Court certificate dated September 30, 2026, and a proposed order.

WHEREFORE, John Bergmayer respectfully requests that the Court grant this motion and admit him pro hac vice for all purposes as counsel for proposed amicus curiae Public Knowledge.

Dated: October 6, 2026

Respectfully submitted,

/s/ John Bergmayer
John Bergmayer
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