UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

AFFIDAVIT OF JOHN BERGMAYER

John Bergmayer, being duly sworn, deposes and says:

1. I am an attorney and Legal Director at Public Knowledge. I submit this affidavit in support of my motion for admission pro hac vice to represent Public Knowledge as proposed amicus curiae in this litigation.

2. My state and District of Columbia bar admissions are as follows: District of Columbia Court of Appeals, April 9, 2012, Bar No. 992602; Supreme Court of Colorado, October 26, 2009, Bar No. 41308 (inactive status).

3. I am also admitted to practice in the following federal courts: Supreme Court of the United States, December 4, 2023; United States Courts of Appeals for the First Circuit, May 7, 2020 (Bar No. 1194430); Second Circuit, November 29, 2021; Fifth Circuit, October 3, 2025; Sixth Circuit, August 15, 2024; Ninth Circuit, December 19, 2017; Tenth Circuit, September 13, 2010; and District of Columbia Circuit, February 10, 2026 (Bar No. 66826).

4. I am a member in good standing of every bar identified above. My Colorado membership is on inactive status.

5. There are no pending disciplinary proceedings against me in any state or federal court.

6. I have never been convicted of a felony.

7. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

8. No explanation is required concerning the matters addressed in paragraphs 5 through 7.

9. Attached is my certificate of good standing from the District of Columbia Court of Appeals, dated September 17, 2026. The certificate identifies me by my full name, John David Bergmayer.

10. My business address is Public Knowledge, 1818 N Street NW, Suite 410, Washington, DC 20036. My telephone number is (202) 861-0020, and my email address is john@publicknowledge.org.

11. I have reviewed the Federal Rules of Civil Procedure, the Local Rules of this Court, the Court's Electronic Case Filing Rules and Instructions, and the individual practices of the judicial officers assigned to this litigation, and I agree to comply with them.

12. I respectfully request admission pro hac vice for all purposes as counsel for proposed amicus curiae Public Knowledge in this litigation.

John Bergmayer

District of Columbia
Sworn to before me this 17th day of September, 2026.

Shamara Fleming
Notary Public
My commission expires: 9-14-2031

