UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates to: *All Cases*	No.: 1:25-md-03143 (SHS) (OTW) Hon. Sidney H. Stein

NOTICE OF MOTION OF THE AI RIGHTS PROJECT FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE IN SUPPORT OF PLAINTIFFS

PLEASE TAKE NOTICE that, pursuant to the Court's inherent authority and its Order of August 7, 2026 (Dkt. No. 1663), proposed amicus curiae The AI Rights Project ("*AIRights*") hereby moves this Court for leave to file the accompanying brief as amicus curiae in support of Plaintiffs.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law, the Declaration of Jim W. Ko, the proposed brief (Exhibit A), the proposed order (Exhibit B), and such other matters as the Court may consider.

Dated: October 14, 2026

Respectfully submitted,

KO IP & AI LAW PLLC

By: /s/ Jim W. Ko

Jim W. Ko, SBN 038530 (AZ)
4539 N 22nd St. #4410
Phoenix, AZ 85016
(480) 809-2247
jim@koailaw.com
Pro hac vice motion pending (Dkt. No. 1938)

Attorney for [Proposed] Amicus Curiae The AI Rights Project