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

DECLARATION OF JIM W. KO

I, Jim W. Ko, declare as follows:

1. I am the Founder and Executive Director of The AI Rights Project ("*AIRights*"). I am also the Principal Attorney of Ko IP & AI Law PLLC, through which I serve as counsel for *AIRights* in this matter. My motion for admission *pro hac vice* was filed on September 11, 2026 (Dkt. No. 1938) and remains pending. I make this declaration in support of *AIRights's* motion for leave to file a brief as amicus curiae. I have personal knowledge of the facts stated here.
2. *AIRights* is an independent, nonpartisan 501(c)(3) public-interest legal organization. It has no parent corporation, no stock, no shareholders, and no members.
3. *AIRights* does not represent, and has no financial or client relationship with, any party to this litigation. It has no financial stake in the outcome. It accepts no funding from major AI developers.
4. No party's counsel authored the proposed brief in whole or in part. No party, party's counsel, or person other than *AIRights* and its counsel contributed money intended to fund the preparation or submission of the brief.
5. I am the author of *The Human Baseline: Silent Recalibration and the Reanchoring of Legal Doctrine in the Age of AI* (SSRN 2026), which is cited in the proposed brief and

develops the framework the brief applies. *AIRights* discloses this relationship so the Court may weigh the brief with full knowledge of its provenance.

6. *AIRights* moved for leave to file a brief as amicus curiae in *In re Mosaic LLM Litigation*, No. 3:24-cv-01451-CRB (N.D. Cal.) (Dkt. No. 420), where that motion and the parties' summary judgment motions remain pending.
7. Attached as Exhibit A is a true and correct copy of the proposed brief. Attached as Exhibit B is a proposed order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 14, 2026, at Phoenix, Arizona.

KO IP & AI LAW PLLC

By: /s/ Jim W. Ko

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Pro hac vice motion pending (Dkt. No. 1938)

Attorney for [Proposed] Amicus Curiae The AI Rights Project