UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC. COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: *Authors Guild, et al. v. OpenAI, Inc., et al.*, No. 1:23-cv-08292-SHS-OTW	1:25-md-03143 (SHS) (OTW) **DECLARATION OF DEFENDANTS' EXPERT NICK FEAMSTER IN OPPOSITION TO BOOKS PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Nick Feamster, Ph.D., declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I submit this Declaration in support of OpenAI Defendants' (collectively, "OpenAI") Opposition to Books Plaintiffs' Motion for Summary Judgment.

2. I am the Neubauer Professor of Computer Science and the Founding Director of the Center for Data and Computing (now the Data Science Institute) at the University of Chicago, where I have served as a full professor since July 2019. I previously served as a computer science professor at Princeton University and the Georgia Institute of Technology.

3. My work includes extensive research on web technologies, Internet protocols, and how web applications behave under different network conditions. I have also researched how web crawlers and bots operate, how websites implement access restrictions, and the relationship between HTTP protocols and user agent strings. I have extensive practical experience with the technical and operational aspects of web crawling. As an early employee and lead technical engineer at LookSmart, an early search engine company, I

designed and wrote LookSmart's first web crawler and indexer in 1997 and handled robots.txt compliance, HTTP protocol interactions, and user agent identification.

4. I received my Bachelor of Science (2000) and Master of Engineering (2001) degrees in Electrical Engineering and Computer Science, and my Ph.D. in Computer Science (2005) from the Massachusetts Institute of Technology, where my doctoral research focused on analyzing and predicting the behavior of large-scale Internet routing systems.

5. I have been engaged on behalf of OpenAI to provide an expert opinion regarding technical issues and standard practices related to web crawling, the technical operation and widespread acceptance of the Robots Exclusion Protocol (REP) via robots.txt files, and whether OpenAI's Browse/Search functionality operates consistently with these industry norms.

6. I submitted an opening expert report in this matter on April 24, 2026; a rebuttal report on May 29, 2026; an addendum and errata to my rebuttal report on June 15, 2026; a reply report on June 26, 2026; and a supplemental response to Dr. Tom Goldstein's supplemental report on July 21, 2026. I was deposed in this case on July 23, 2026.

7. I stand by and reaffirm each of the statements and opinions set forth in my reports, which remain true and correct to the best of my knowledge, information, and belief.

8. Attached hereto as **Exhibit A** is a true and correct excerpt of the opening report I submitted in this matter on April 24, 2026.

I declare under penalty of perjury that the foregoing is true and correct, and that I have personal knowledge of these facts and am competent to testify thereto if called upon to do so.

Dated: October 22, 2026
Chicago, Illinois

By: _____
Nick Feamster