UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: No. 1:23-cv-11195 (SHS) (OTW)	25-md-3143 (SHS) (OTW) **NEWS PLAINTIFFS' MOTION TO SEAL**

Under paragraph 22 of the Stipulated Protective Order in this case (*The New York Times* Dkt. 127), Plaintiffs The New York Times Company ("The Times"), Daily News, LP, et al. ("Daily News Plaintiffs"), and The Center for Investigative Reporting ("CIR") (collectively the "News Plaintiffs"), respectfully seek to provisionally file under seal their Memorandum of Law in Opposition to OpenAI's Defendants' Objection to the Preservation Order at Dkt. 33. *See* Dkt. 92. News Plaintiffs seek to file portions of their response, and the exhibits attached thereto, under seal because they discuss documents and information that OpenAI has designated as Protected Discovery Material under the Protective Order. Dkt. 127 ¶ 22 (*The Times* docket). News Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. *Id.* News Plaintiffs will review OpenAI's filings, and if necessary, confer about any disagreement.

Dated: June 17, 2025

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