**UNITED STATES DISTRICT COURT**
**SOUTHERN DISTRICT OF NEW YORK**

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| IN RE:<br><br>OPENAI, INC.,<br><br>COPYRIGHT INFRINGEMENT LITIGATION<br><br>This Document Relates To:<br><br>All Cases | 25-md-3143 (SHS) (OTW)<br><br>**PLAINTIFFS' MOTION TO SEAL** |

Under paragraph 21 of the Stipulated Protective Order in the News Cases (*Daily News* Dkt. 129), News and Class Plaintiffs respectfully seek to provisionally file under seal portions of their letter motion regarding disputed issues in the parties' proposed omnibus protective order. Plaintiffs seek to file portions of their letter motion under seal because these portions cite material designated by Defendants as Protected Discovery Material under the Protective Order. Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. Plaintiffs will review Defendants' filings, and if necessary, confer about any disagreement.

Dated: June 18, 2025

Respectfully,

*/s/ Davida Brook*
Davida Brook
Susman Godfrey LLP
News Plaintiffs' Liaison Counsel