UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION	Case No. 1:25-md-3143 (SHS) (OTW)
This Document Relates To: All Cases	Hon. Sidney H. Stein

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Brendan P. Cullen hereby moves this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for *amicus curiae* Khosla Ventures, LLC in the above-captioned action.

I am in good standing of the bar of the State of California, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony or crime. I have never been censured, suspended, disciplined, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: October 28, 2026

Respectfully submitted,

/s/ Brendan P. Cullen

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