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

DECLARATION OF IN SUPPORT OF ADMISSION *PRO HAC VICE*

BRENDAN P. CULLEN hereby states and declares as follows:

1. I am a Partner at Sullivan & Cromwell LLP, 550 Hamilton Avenue, Palo Alto, California 94301 and represent proposed *amicus curiae* Khosla Ventures, LLC.

2. I am a member in good standing of the State Bar of California.

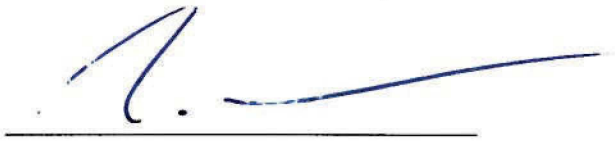
3. There are no pending disciplinary proceedings against me in any state or federal court.

4. I have never been convicted of a felony.

5. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

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

Executed this 26th day of October 2026, in Palo Alto, California.







ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Santa Clara)

On October 26, 2026 before me, Mikala Aumua
(insert name and title of the officer)

personally appeared Brendan P. Cullen,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____ (Seal)

MIKALA AUMUA
Notary Public - California
Santa Clara County
Commission # 2514963
My Comm. Expires Mar 23, 2029