UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: 1:23-cv-08292 (SHS) (OTW) 1:23-cv-10211 (SHS) (OTW) 1:25-cv-03482 (SHS) (OTW) 1:23-cv-11195 (SHS) (OTW) 1:24-cv-01515 (SHS) (OTW) 1:24-cv-03285 (SHS) (OTW) 1:24-cv-04872 (SHS) (OTW) 1:25-cv-04315 (SHS) (OTW)	25-md-3143 (SHS) (OTW)

NOTICE OF MOTION BY THE ASSOCIATION OF AMERICAN PUBLISHERS, COPYRIGHT CLEARANCE CENTER, INDEPENDENT BOOK PUBLISHERS ASSOCIATION, AND INTERNATIONAL ASSOCIATION OF SCIENTIFIC, TECHNICAL & MEDICAL PUBLISHERS FOR LEAVE TO FILE AMICI CURIAE BRIEF IN SUPPORT OF CLASS PLAINTIFFS' AND NEWS PLAINTIFFS' MOTIONS FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, proposed amici curiae the Association of American Publishers, Copyright Clearance Center, Independent Book Publishers Association, and International Association of Scientific, Technical & Medical Publishers hereby move this Court, before the Honorable Sidney H. Stein, United States District Judge, pursuant to the Court's August 7, 2026 Order (Dkt. 1663, 25-md-3143), for an order granting leave to file the accompanying proposed amici curiae brief in support of the class plaintiffs' and news plaintiffs' motions for summary judgment.

Dated: October 29, 2026

s/ Lucy Grace D. Noyola

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