UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OpenAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: *All cases*	25-md-3143 (SHS) (OTW)

NOTICE OF MOTION OF DIGITAL CONTENT NEXT FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE IN SUPPORT OF NEWS PLAINTIFFS

PLEASE TAKE NOTICE that proposed amicus curiae Digital Content Next ("DCN"), by and through its undersigned counsel, will move this Court for an order to grant DCN leave to file an amicus brief in support of Plaintiffs pursuant to Federal Rule of Civil Procedure 7(b), the Court's inherent authority, and its Orders of August 7, 2026 (ECF 1663) and September 24, 2026 (ECF 2049).

This motion is based upon this Notice of Motion, the proposed brief (Exhibit A hereto), Declaration of Rande E. Price (Exhibit B hereto), the accompanying Memorandum of Law, and such other matters as the Court may consider.

Dated: October 29, 2026

Respectfully submitted,

HUTH REYNOLDS LLP

/s/ Karl C. Huth

Karl C. Huth
Matthew J. Reynolds
Jennifer Sturiale, Of Counsel
J. Lee Hill
huth@huthreynolds.com
reynolds@huthreynolds.com
jsturiale@huthreynolds.com
lhill@huthreynolds.com
41 Cannon Court
Huntington, NY 11743
Tel: (631) 263-3648
Fax: (646) 664-1512

Attorneys for Digital Content Next