Exhibit B

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)

DECLARATION OF RANDE E. PRICE IN SUPPORT OF MOTION FOR LEAVE TO FILE AMICUS BRIEF BY DIGITAL CONTENT NEXT

I, Rande E. Price, hereby declare as follows:

1. I currently am employed by Digital Content Next ("DCN") as Vice President of Research.

2. In that capacity, I lead DCN's research strategy, oversee survey design, and conduct market analyses to inform premium digital publishers' content, consumer, and business strategies. This work includes financial and operational benchmarking of participating premium publishers. I translate marketplace trends, industry performance, and consumer insights into actionable guidance for senior executives.

3. Founded in 2001, DCN is a trade organization dedicated to serving the unique and diverse needs of high-quality digital content companies that enjoy trusted, direct relationships with consumers and advertisers. DCN's members include many of the most trusted and well-respected publishing brands in the United States. Together, DCN's members have an unduplicated audience of approximately 259 million unique visitors and reach about 95 percent of the U.S. online population.

4. As part of its ordinary business practice, DCN regularly conducts analyses relating to its members financial and other business performance, including surveying its members on a variety of topics, towards DCN's institutional goal of developing and promoting understanding of the issues facing its members and impacting on the digital content, news, and media markets.

5. As part of that process, DCN maintains internal, confidential records of such analyses, of which the key findings relating to the above-captioned matter are summarized below.

6. In June 2026, a DCN member study revealed that advertising generated 84 percent of digital revenue in 2025 for participating DCN member companies, while other activities, including subscriptions, generated 16 percent.

7. Data collected from participating DCN's members indicate that from 2023 compared to 2025, there was a 26 percent reduction in unique visitors to DCN's members' sites, 18 percent reduction in total views of their sites, and a 16 percent reduction in total visits to their sites.

8. In early July 2025, DCN conducted a snap study of its members specifically to assess the impact of Google's "AI Overviews" and "AI Mode," both of which yield AI-generated results in response to user queries, similar to Defendants' tools here. DCN's study found that, over the eight-week period covered by the survey, the year-over-year ("YoY") web traffic referred to the participating surveyed publishers declined, with a median decline rate of 10 percent.

9. In July 2026, DCN repeated its 2025 survey and analyzed the same eight-week period in 2026. It found that among participating members, when compared to the web traffic in 2025, the web traffic in 2026 had declined YoY even more dramatically, with a median decline of 22 percent.

10. A June 2026 analysis of participating DCN members reveals that both total advertising revenue and total overall revenue declined 5 percent in 2025 as compared to 2024.

11. DCN's internal data show that since the introduction of LLMs relying on RAG technology, digital publishers have received significantly fewer unique visitors to their webpages with benchmark data showing a 16 percent reduction in visits to participating member sites in 2025 as compared to 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 29, 2026
New York, New York

Rande E. Price