UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION	No. 25-md-3143 (SHS) (OTW)
THIS DOCUMENT RELATES TO: ALL CASES	Hon. Sidney H. Stein Hon. Ona T. Wang

NOTICE OF MOTION FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE* IN SUPPORT OF PLAINTIFFS

PLEASE TAKE NOTICE that, pursuant to the Court's inherent authority and its Order of August 7, 2026 (Dkt. No. 1663), as extended by the Court's Order of September 24, 2026 (Dkt. 2049), proposed *amici curiae* Screen Actors Guild-American Federation of Television and Radio Artists ("SAG-AFTRA"), American Federation of Musicians of the United States and Canada ("AFM"), Writers Guild of America, West, Inc. ("WGAW"), and Writers Guild of America East, Inc. ("WGAE") (collectively, the "Unions") hereby move this Court for leave to file the accompanying proposed brief as *amici curiae* in support of Plaintiffs.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law, the proposed brief attached as Exhibit A, the proposed order, and such other matters as the Court may consider.

Dated: October 29, 2026

Respectfully submitted,

/s/ *Danielle S. Van Lier*

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