UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: News Cases 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	1:25-md-03143-SHS-OTW

NEWS ORGANIZATIONS' MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF NEWS PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT AND IN OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Please take notice that, upon the accompanying Memorandum of Law, the undersigned hereby moves the Court, on behalf of News/Media Alliance, National Newspaper Association, The National Press Photographers Association, and Pro Publica, Inc. (collectively, "*Amici*"), before the Honorable Sidney H. Stein in Courtroom 23A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order granting them leave to file a brief as *amicus curiae* in support of News Plaintiffs' motion for partial summary judgment, and in opposition to Defendants' motions for summary judgment ("Brief"). *Amici*'s Brief is attached to this Motion for Leave as Exhibit A.

Amici are organizations representing news publishers whose copyrighted works are used by AI companies to train and operate generative AI systems. *Amici* respectfully submit that the

Brief will aid the Court's evaluation of Defendants' fair use defense because it provides valuable industry perspective on the cost of producing and value of news content, the ways in which Defendants exploit that content, and the direct and derivative markets upon which news publishers rely to sustain their businesses. The Brief explains, *inter alia*, why a determination of fair use would undermine those markets, threatening publishers' ability to continue investing in the high-quality journalism that is foundational to a democratic society.

The points and authorities upon which *Amici* rely in support of this Motion are set forth in the accompanying Memorandum of Law.

DATED: October 30, 2026

Respectfully submitted,

By: /s/ Jacqueline C. Charlesworth

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