UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC. COPYRIGHT INFRINGEMENT LITIGATION	No. 25-md-3143 (SHS) (OTW)

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Civil Rule 1.3, Marc Rotenberg respectfully moves for admission pro hac vice in this action as counsel for proposed amici curiae Center for AI and Digital Policy, AI experts, and legal scholars.

In support of this motion, Mr. Rotenberg submits the accompanying notarized affidavit and a certificate of good standing issued within the preceding thirty days by the District of Columbia Court of Appeals.

Mr. Rotenberg is an active member in good standing of the Bar of the District of Columbia, D.C. Bar No. 422825. He was also admitted to the Massachusetts Bar on December 22, 1987, BBO No. 550488. Current certificates of good standing from the District of Columbia Court of Appeals and the Massachusetts Supreme Judicial Court are submitted with this motion. The Massachusetts certificate was issued on October 30, 2026, subsequent to the execution of the accompanying affidavit.

Mr. Rotenberg respectfully requests that the Court grant this motion and admit him pro hac vice for purposes of appearing on behalf of the proposed amici curiae in this proceeding.

Dated: October 30, 2026
Philadelphia, Pennsylvania

Respectfully submitted,

/s/ Marc Rotenberg
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