UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC. COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: All Cases	No. 25-md-3143 (SHS) (OTW)

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

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Tod Cohen dated October 30, 2026 (the "Cohen Declaration"), and the exhibit thereto, proposed amici curiae the AI Coalition for Data Integrity; Writers Guild of America, West, Inc.; Writers Guild of America East, Inc.; National Association of Voice Actors; Microstocksolutions LLC; Digital Media Licensing Association, Inc. d/b/a Digital Media Leadership Alliance; Transparency Coalition AI; Association of Medical Illustrators; Association of Independent Music Publishers; and Music Workers Alliance, Inc. (collectively, "Amici") will move this Court, before the Honorable Sidney H. Stein, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time to be set by the Court, for an order granting Amici leave to file the proposed Brief of Amici Curiae AI Coalition for Data Integrity et al. in Support of Plaintiffs' Motions for Summary Judgment and in Opposition to Defendants' Motions for Summary Judgment, attached as Exhibit A to the Cohen Declaration, in connection with the pending motions for summary judgment.

This motion is made pursuant to the Court's Order dated August 7, 2026 (ECF No. 1663), which directs that anyone wishing to file an amicus brief in connection with the summary judgment motions move for leave and include the proposed brief, and pursuant to the Court's inherent authority to permit the participation of amici curiae. The proposed brief contains 5,670 words, within the 6,000-word limit set by that Order.

Counsel's motion for admission *pro hac vice* (ECF No. 2115) was filed on October 20, 2026, and on October 21, 2026 the Clerk's Office noted that it had been reviewed and that there were no deficiencies. That motion remains pending, and counsel respectfully submits this motion to comply with the Court's October 30, 2026 deadline.

Dated: San Francisco, California
October 30, 2026

Respectfully submitted,

/s/ Tod Cohen
Tod Cohen (*pro hac vice* motion pending, ECF No. 2115)
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