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)

DECLARATION OF TOD COHEN IN SUPPORT OF MOTION FOR LEAVE TO FILE BRIEF OF AMICI CURIAE

I, Tod Cohen, declare as follows:

1. I am the principal of the Law Office of Tod Cohen and counsel for proposed amici curiae in this action. I am a member in good standing of the bars of the District of Columbia and the State of California. My motion for admission pro hac vice in this action is pending (ECF No. 2115). I submit this declaration in support of the motion of proposed amici curiae for leave to file a brief in support of Plaintiffs. I have personal knowledge of the facts stated here.

2. Attached as Exhibit A is a true and correct copy of 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.

3. The proposed Brief contains 5,670 words, excluding the caption, table of contents, table of authorities, signature block, and certificate of compliance, as counted by the word-processing program used to prepare it.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 30, 2026, in San Francisco, California.

/s/ Tod Cohen
Tod Cohen