UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION, This Document Relates To: Case No. 1:23-cv-11195	25-md-3143 (SHS) (OTW) Hon. Sidney H. Stein Hon. Ona T. Wang

NOTICE OF MOTION OF MICHAEL MORITZ FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE IN SUPPORT OF NEITHER PARTY

PLEASE TAKE NOTICE that, pursuant to the Court's inherent authority and its Order of August 7, 2026 (Dkt. No. 1663), Michael Moritz hereby moves this Court for leave to file the accompanying brief as amicus curiae in support of neither party.

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

Dated: October 30, 2026

Respectfully submitted,

By: /s/ Justin V. Arborn

Justin V. Arborn
HEISE SUAREZ MELVILLE, P.A.
3 International Drive
Suite 205
Rye Brook, New York 10573
jarborn@hsmpa.com
(305) 800-4476

Counsel for [Proposed] Amicus Curiae Michael Moritz