UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC.
COPYRIGHT INFRINGEMENT
LITIGATION

25-md-3143 (SHS) (OTW)

This Document Relates To:

The New York Times Company v. Microsoft Corporation, et al., No. 1:23-cv-11195

NOTICE OF MOTION OF WILLIAM MORRIS ENDEAVOR ENTERTAINMENT, LLC FOR LEAVE TO FILE AMICUS CURIAE BRIEF

PLEASE TAKE NOTICE that proposed amicus curiae William Morris Endeavor Entertainment, LLC ("WME") moves pursuant to Federal Rule of Civil Procedure 7(b), Local Civil Rule 7.1, and the Court's August 7, 2026 Order (ECF No. 1450), as extended by its September 24, 2026 Order (ECF No. 1618) (both in No. 1:23-cv-11195), for leave to file the accompanying amicus curiae brief in support of the News Plaintiffs' oppositions to OpenAI's and Microsoft's summary-judgment motions on fair use.

The application is supported by this notice of motion, the accompanying memorandum of law, and the proposed amicus curiae brief attached as Exhibit A.

Dated: New York, New York
October 30, 2026

Respectfully submitted,

/s/ Vivek Jayaram
Vivek Jayaram
JAYARAM PLLC
54 W. 21st St.
New York, New York 10010
646-325-9855
vivek@jayaramlaw.com

Counsel for Proposed Amicus Curiae
William Morris Endeavor Entertainment, LLC