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-08292-SHS-OTW Case No. 1:23-cv-10211-SHS-OTW	ECF CASE 1:25-MD-03143-SHS/OTW

CLASS PLAINTIFFS' NOTICE OF AMENDMENT

Class Plaintiffs respectfully submit this Notice of Amendment regarding Plaintiffs' Amended Opposition to Defendants' Rule 702 Motion to Exclude Expert Testimony. This revision is reflected below and is submitted with the consent of Defendants:

Original	Amended
Page 6: Defendants' reliance on Lasinski's deposition fares no better. Asked whether he had conducted "any quantitative analysis" showing that book prices "have decreased because of ChatGPT and Copilot," Lasinski answered that he had not performed that price analysis, then explained what his analysis does show: "since the flood of … AI-generated books, the revenue per book, even without any AI generation in it, goes down." Malhotra Ex. 9, 97:16–98:02. Defendants recast that as a concession that he is "not making a 'causal claim'" about book revenues. Mem.5. But declining to run a particular price regression is not a disclaimer of causation, and the answer Defendants omit describes the very relationship they say he disclaimed.	Page 6: Defendants' reliance on Lasinski's deposition fares no better. Asked whether he had conducted "any quantitative analysis" showing that book prices "have decreased because of ChatGPT and Copilot," Lasinski answered that he had not performed that price analysis. Malhotra Ex. 9, 97:16–97:23. Defendants recast that as a concession that he is "not making a 'causal claim'" about book revenues. Mem.5. But declining to run a particular price regression is not a disclaimer of causation, and Lasinski's reports and testimony describe the very relationship they say he disclaimed. ECF1825-2 ¶¶410–14, 433–36, ECF1825-3 ¶¶77, 105–09.

Date: November 9, 2026

Respectfully submitted,

/s/ Justin A. Nelson
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Telephone: 713.651.9366
jnelson@susmangodfrey.com
Interim Lead Counsel for Class Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2026, I caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Southern District of New York using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ J. Craig Smyser
(Signature)