UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: No. 1:23-cv-11195 (SHS) (OTW)	25-md-3143 (SHS) (OTW) **NEWS PLAINTIFFS' MOTION TO SEAL**

Under paragraph 22 of the Stipulated Protective Order in this case (*The New York Times* Dkt. 127), Plaintiffs The New York Times Company ("The Times") and Daily News, LP, et al. ("Daily News Plaintiffs") (collectively the "News Plaintiffs"), respectfully seek to provisionally file under seal Exhibit A to their Letter submitting a supplemental document in connection with their motion to compel Defendants to produce documentation concerning their metric-tracking dashboards (Dkt. 163). News Plaintiffs seek to provisionally file Exhibit A under seal because it contains screenshots from a video that Microsoft has designated as Protected Discovery Material under the Protective Order. Dkt. 127 ¶ 22 (*The Times* docket). News Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Microsoft has five business days to file a statement of reasons for why the material should be sealed. *Id.* News Plaintiffs will review Microsoft's filings, and if necessary, confer about any disagreement.

Dated: June 23, 2025

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