UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION	No. 25-md-3143 (SHS) (OTW)
THIS DOCUMENT RELATES TO: ALL CASES	Hon. Sidney H. Stein Hon. Ona T. Wang

NOTICE OF MOTION OF DIRECTORS GUILD OF AMERICA, INC. FOR LEAVE TO JOIN THE BRIEF OF SAG-AFTRA, AFM, WGAW, AND WGAE AS *AMICI CURIAE* IN SUPPORT OF PLAINTIFFS

PLEASE TAKE NOTICE that proposed amicus curiae Directors Guild of America, Inc. ("DGA") hereby moves this Court for an order, pursuant to the Court's inherent authority and its Order of August 7, 2026 (Dkt. No. 1663), granting DGA leave to join the Unions' brief as *amici curiae* in support of Plaintiffs (Dkt. No. 2332-1), which the Court deemed filed by Order dated November 6, 2026 (Dkt. No. 2496), without any change to the text of that brief. This motion is made with the consent of the existing *amici*, Screen Actors Guild-American Federation of Television and Radio Artists ("SAG-AFTRA"), American Federation of Musicians of the United States and Canada ("AFM"), Writers Guild of America, West, Inc. ("WGAW"), and Writers Guild of America East, Inc. ("WGAE") (collectively, the "Unions").

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law, the Declaration of Danielle S. Van Lier, the consent of the

Unions, the proposed new caption page attached as Exhibit A, the proposed order, and such other matters as the Court may consider.

Dated: November 9, 2026.

Respectfully submitted,

By: /s/ *Danielle S. Van Lier*

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