UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: ALL ACTIONS	25-md-03143 (SHS) (OTW) **DEFENDANTS' AMENDED AND SUPPLEMENTAL RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Defendants OpenAI Foundation,[1] OpenAI OpCo, LLC,[2] OpenAI GP, L.L.C., OAI International, Inc.,[3] OpenAI Global, LLC, OAI Corporation,[4] OpenAI Group PBC, OpenAI Startup Fund I L.P., OpenAI Startup Fund GP I, L.L.C., and OpenAI Startup Fund Management, LLC (collectively, "OpenAI"), by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 7.1, further amend and supplement their disclosure as follows:[5]

1. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI Foundation states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.
2. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI Group PBC states that it is partially owned by OpenAI Foundation, which also has certain contractual rights as to OpenAI Group PBC and its board of directors. OpenAI Group PBC further states

[1] OpenAI, Inc. changed its name in October 2025 to OpenAI Foundation. *See* ECF 1486 ¶ 1.
[2] OpenAI LP changed its name in January 2023 to OpenAI OpCo, LLC. *See* ECF 1486 n.2.
[3] OpenAI, L.L.C. converted, effective December 31, 2025, from a limited liability company to a corporation named OAI International, Inc. *See* ECF 1486 ¶ 6.
[4] OAI Corporation, LLC converted in September 2023 from a limited liability company to a corporation named OAI Corporation. *See* ECF 1486 ¶ 7.
[5] This disclosure is intended to be comprehensive across the MDL for purposes of Rule 7.1. Not all entities listed herein are named in every individual member action.

that Microsoft Corporation and SoftBank Group Corporation are publicly held corporations that each have a financial interest in OpenAI Group PBC of 10% or more on an as-converted basis.

3. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI Global, LLC states that it is a subsidiary of OAI Corporation, OpenAI Global HoldCo, Inc., and OpenAI Global HoldCo II, Inc., and that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global, LLC of 10% or more.

4. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI OpCo, LLC states that it is a subsidiary of OpenAI Global, LLC and that no publicly held corporation has a financial interest in OpenAI OpCo, LLC of 10% or more. OpenAI OpCo, LLC states that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global, LLC of 10% or more.

5. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI GP, L.L.C. states that it is a subsidiary of OpenAI Group PBC and that no publicly held corporation has a financial interest in OpenAI GP, L.L.C. of 10% or more.

6. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OAI International, Inc. states that it is a subsidiary of OpenAI OpCo, LLC and that no publicly held corporation has a financial interest in OAI International, Inc. of 10% or more. OAI International, Inc. further states that it is an indirect subsidiary of OpenAI Global, LLC and that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global, LLC of 10% or more.

7. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OAI Corporation states that it is a subsidiary of OpenAI Group PBC and that no publicly held corporation has a financial interest in OAI Corporation of 10% or more.

8. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI Startup Fund I L.P. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C., which is a subsidiary of OpenAI Global, LLC, and that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Startup Fund I L.P. of 10% or more.

9. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI Startup Fund GP I, L.L.C. states that it is a subsidiary of OpenAI Global, LLC, and that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global, LLC of 10% or more.

10. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI Startup Fund Management, LLC states that it is a subsidiary of OpenAI Global, LLC and that no publicly held corporation has a financial interest in OpenAI Startup Fund Management, LLC of 10% or more. OpenAI Startup Fund Management, LLC states that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global, LLC of 10% or more.

Dated: November 16, 2026

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