May 20, 2025

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

RE: *In re: OpenAI Inc., Copyright Infringement Litigation*, 25-md-3143 (SHS) (OTW)
This Document Relates To: All Actions

Dear Judge Wang:

Per the Court's May 9 Order (Dkt. 416), on behalf of all Parties, please see attached charts containing summaries of the discovery disputes for discussion at the upcoming May 27, 2025 conference. Exhibit A summarizes global case management matters relating to all parties (including all Plaintiffs). Exhibit B contains a chart summarizing the discovery disputes in the News Cases,[1] and Exhibit C contains a chart summarizing the discovery disputes in the Class Cases.

Sincerely,

LIEFF CABRASER HEIMANN & BERNSTEINS LLP	SUSMAN GODFREY LLP	COWAN, DEBAETS, ABRAHAMS & SHEPPARD LLP
/s/ Rachel Geman	/s/ Rohit Nath	/s/ Scott J. Sholder
Rachel Geman	Rohit Nath	Scott J. Sholder

[1] The newly centralized *Ziff Davis* plaintiffs reserve all rights as to the disputes presented in the News Cases chart, including because the *Ziff Davis* plaintiffs did not take part in the briefing on any of these disputes. *See Ziff Davis, Inc., v. OpenAI Inc.* (25-cv-0501) (D. Del.).