UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: **OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION** This Document Relates To: 1:23-cv-11195 1:24-cv-01515 1:24-cv-03285 1:24-cv-04872 1:25-cv-04315	**ECF CASE** 1:25-md-03143-SHS/OTW

NEWS PLAINTIFFS' MOTION TO SEAL

Under paragraph 34 of the Stipulated Protective Order in this case (MDL Dkt. 367), Plaintiffs The New York Times Company, Daily News, LP et al., The Center for Investigative Reporting, Inc., Ziff Davis Inc. et al., and The Intercept Media, Inc. (collectively, the "News Plaintiffs") respectfully seek to provisionally file under seal portions of their letter motion to compel. The letter motion seeks a conference to discuss a discovery dispute—specifically, News Plaintiffs' request to compel OpenAI to produce documents relating to "pink-slime" entities' use of or reliance on OpenAI's generative AI tools to generate journalism. News Plaintiffs seek to file portions of this letter motion and Exhibit C under seal because portions of the motion and Exhibit C include and discuss a document that OpenAI has designated as Protected Discovery Material under the Protective Order. Dkt. 367 ¶ 34. News Plaintiffs do not affirmatively seek to seal any material.

Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. *Id.* Plaintiffs will review OpenAI's filings, and if necessary, confer about any disagreement.

Dated: September 9, 2025

/s/ Davida Brook
Davida Brook (*admitted pro hac vice*)
Susman Godfrey LLP
1900 Aveneue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: (310) 789-3100
dbrook@susmangodfrey.com

News Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify this 9th day of September 2025, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Davida Brook
(Signature)