UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: All Actions.	Case No. 1:25-md-03143-SHS-OTW **MOTION TO WITHDRAW AS COUNSEL OF RECORD**

Katherine B. Forrest moves this Court to withdraw as counsel for defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OpenAI LP, OpenAI Holdings, LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, OpenAI Startup Fund Management LLC, and OAI Corporation (collectively "Defendants") in the above-captioned action and in compliance with Local Rule 1.4.

The Defendants will continue to be represented by other firms in this proceeding including Latham & Watkins LLP, Morrison & Foerster LLP, Wilson Elser Moskowitz Edelman & Dicker LLP (NY), Keker, Van Nest & Peters LLP, Lewis & Llewellyn LLP CA, Williams & Connolly LLP, Polsinelli, Lewis & Llewellyn LLP, Kwun Bhansali Lazarus LLP, and Wilson Elser Moskowitz Edelman & Dicker LLP (NY), and no party will be prejudiced if this Motion is granted.

Dated: New York, New York
October 13, 2025

By: */s/ Katherine B. Forrest*

Katherine B. Forrest
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SO ORDERED:

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Certificate Of Service

I, Katherine B. Forrest, hereby certify that on October 13, 2025, I caused a true and correct copy of the foregoing to be served upon all parties to this litigation via the CM/ECF system, and on my client via email.

October 13, 2025
New York, New York

/s/ *Katherine B. Forrest*
Katherine B. Forrest