APPENDIX A

Plaintiffs' Deposition Hours for OpenAI Witnesses[1]

	30(b)(1) Witnesses Taken	30(b)(1) Hours Used	30(b)(1) Remaining Witnesses	30(b)(1) Remaining Time	30(b)(6) Witnesses Taken	30(b)(6) Hours Used	30(b)(6) Remaining Witnesses	30(b)(6) Remaining Time
Class	27 Witnesses Taken	66.9 Hours Used 2.48 per witness deposed	26 Witnesses Remaining	38.1 Hours Remaining 1.46 per remaining witness				
News	26 Witnesses Taken	80.6 Hours Used 3.1 per witness deposed	23 Witnesses Remaining	49.4 Hours Remaining 2.15 per remaining witness				
All Plaintiffs					8 Witnesses Taken	30 Hours Used 3.75 hours per witness deposed	9 Witnesses Remaining	25 Hours Remaining 2.77 hours per remaining witness

[1] This chart does not account for one deposition that occurred today on January 30. For purposes of this chart, that deposition is treated as a "remaining witness."

Plaintiffs' Deposition Hours for Microsoft Witnesses

	30(b)(1) Witnesses Taken	**30(b)(1) Hours Used**	**30(b)(1) Remaining Witnesses**	**30(b)(1) Remaining Time**	**30(b)(6) Witnesses Taken**	**30(b)(6) Hours Used**	**30(b)(6) Remaining Witnesses**	**30(b)(6) Remaining Time**
Class	16 Witnesses Taken	41.25 Hours Used 2.58 per witness deposed	21 Remaining Witnesses	58.75 Hours Remaining 2.8 per remaining witness				
News	17 Witnesses Taken	47.45 Hours Used 2.79 per witness deposed	23 Witnesses Remaining	64.55 Hours Remaining 2.81 per remaining witness				
All Plaintiffs					9 Witnesses Taken	42 Hours Used 4.67 per witness deposed	7 Witnesses Remaining	0 Hours Remaining