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October 15, 2025

VIA ECF

Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

cc: All Counsel of Record (via ECF)

Re: ***OpenAI's Letter to Request Oral Argument***
In re: OpenAI, Inc., Copyright Infringement Litigation, No. 1:25-md-03143-SHS-OTW
This Document Relates to: *NYT v. Microsoft et al., Case No. 1:23-cv-11195*

Dear Judge Stein:

On behalf of the OpenAI,[1] we write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument be held with respect to OpenAI's Filed Objection (ECF 638) (Notice of Objection) to Discovery Order at ECF No. 604.

Respectfully,

KEKER, VAN NEST & PETERS LLP

/s/ Sarah Salomon

[1] OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.