EXHIBIT B

From: Talebian, Sara
Sent: Tuesday, September 9, 2025 11:46 AM
To: ZD-AICopyright@ruttenbergiplaw.com; Klaris Law Ziff Davis; Charles Naggar
Cc: OpenAICopyright; KVP-OAI; Latham OpenAI Copyright Team
Subject: Ziff Davis / OpenAI - RFP Dispute Proposals

Counsel –

We write to memorialize our three M&Cs with Ziff Davis. Initially, you asked to meet and confer virtually, which we obliged and met and conferred on Wednesday, September 3, Thursday, September 4, and Monday, September 8, for a total of 3.5 hours. Our goal for these virtual conferrals has been to better understand Ziff Davis's positions so that we can be more efficient in proposing modified scopes to the 56 RFPs you raised to OpenAI a month after we served our responses.

We understand that you have found the pace of the meet and confers to be frustrating and that you would now prefer to meet and confer in writing to speed up the process as you are concerned about the timing of document productions and depositions. Although we note that the pace of meet and confers matches our experience when conferring with the other plaintiffs in the MDL, we are happy to continue our conferral in writing to resolve these discovery disputes, as you have requested.

Below are OpenAI's proposed modified scopes for RFP Nos. 1-11. We will follow up with a written response to your September 2 Deficiency Letter by the end of next week, addressing the remaining 45 RFPs. As part of this response letter, we will offer proposals for the RFPs where we initially responded with an offer to meet and confer. Our initial offers to meet and confer were made because we have questions regarding these Requests. We still think that is the better way to proceed, but in the interest of compromise and trying to move things forward in the manner you seem to prefer, we will include proposals for these RFPs for your consideration, in addition to stating our questions.

RFPs 1-2: OpenAI will produce documents (including communications with Ziff Davis) in OpenAI's possession, custody, or control, if any, referring to the use of Ziff Davis textual content, authored, produced, published, or distributed by the publications and brands listed in Exhibit A to the FAC, by OpenAI in connection with the Relevant Models (including documents discussing the appearance of copies of such content in outputs by the Relevant Models, if any) that it locates pursuant to a reasonable custodial search using search terms.

RFPs 3-6: OpenAI clarifies that to the extent relevant, non-privileged documents concerning OpenAI's "reliance on, use of, or understanding of robots.txt" exist and can be located pursuant to a reasonable search, they will be included within OpenAI's agreement to produce responsive, non-privileged documents in its possession, custody, or control, if any, concerning OpenAI's approach to robots.txt. OpenAI also confirms that the search term for this RFP is: ((robot OR crawl* OR bot OR spider OR robots.txt) w/15 (data OR content OR index)).

RFP 7: OpenAI will, if it has not already, produce non-privileged documents in our possession, custody, or control concerning or relating to Media Manager.

RFP 8: This Request is covered by our proposed offer in response to RFPs 1-2.

RFP 9-11: These Requests are also covered by our proposed offer in response to RFPs 1-2.

Best,
Sara

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