KEKER VAN NEST & PETERS

LATHAM & WATKINS LLP

MORRISON FOERSTER

October 21, 2025

VIA ECF
Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *In re: OpenAI Inc., Copyright Infringement Litigation*, 25-md-3143 (SHS) (OTW)
This Document Relates To: All Actions

Dear Judge Wang:

On behalf of all parties, counsel for OpenAI hereby respectfully submit the following charts for discussion at the upcoming October 29, 2025 discovery conference:

- **Exhibit A**, which summarizes the discovery disputes in the Class Cases;
- **Exhibit B**, which summarizes the global issues impacting all parties across cases; and
- **Exhibit C**, which summarizes the discovery disputes in the News Cases.

Sincerely,

KEKER, VAN NEST & PETERS LLP	LATHAM & WATKINS LLP	MORRISON & FOERSTER LLP
/s/ Christopher S. Sun	*/s/ Margaret Graham*	*/s/ Rose S. Lee*
Christopher S. Sun	Margaret Graham	Rose S. Lee