UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

OPENAI, INC.,
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This Document Relates to:

THE NEW YORK TIMES COMPANY v. MICROSOFT CORPORATION, et al.

Civil Action No. 25-md-3143

MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, I, Floyd G. Short, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Plaintiff The New York Times Company in the above-captioned action.

I am an active member in good standing of the State Bar of Washington. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached my declaration pursuant to Local Rule 1.3, as well as a certificate of good standing from the Washington Supreme Court.

Dated: October 23, 2025

/s/ Floyd G. Short

Floyd G. Short (*pro hac vice*)
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify this 23th day of October, 2025, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Floyd G. Short
Floyd G. Short