SUSMAN GODFREY L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
1000 LOUISIANA
SUITE 5100
HOUSTON, TX 77002-5096
(713) 651-9366
FAX (713) 654-6666
WWW.SUSMANGODFREY.COM

401 UNION STREET
SUITE 3000
SEATTLE, WA 98101-2668
(206) 516-3880

ONE MANHATTAN WEST
NEW YORK, NY 10001-8602
(212) 336-8330

1900 AVENUE OF THE STARS
SUITE 1400
LOS ANGELES, CA 90067
(310) 789-3100

JUSTIN A. NELSON
DIRECT DIAL 713-653-7895

E-MAIL JNELSON@SUSMANGODFREY.COM

October 29, 2025

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

RE: In re OpenAI, Inc. Copyright Infringement Litigation (No. 1:25-md-03143) – This document relates to the following Class Cases: Case No. 1:23-cv-08292, Case No. 1:23-cv-10211, Case No. 1:24-cv-00084, Case No. 1:25-cv-03291, Case No. 1:25-cv-03482, Case No. 1:25-cv-03483 – Update on Seven Clawbacks in Dkt. 662

Dear Judge Wang:

Consistent with Your Honor's instructions at this morning's hearing, Class Plaintiffs and OpenAI conferred this afternoon on the seven clawbacks in Dkt. 662. The parties have reached a resolution and agree that *in camera review* is not necessary at this time.

Sincerely,

/s/ Justin A. Nelson
Justin A. Nelson
Susman Godfrey, LLP
Interim Lead Class Counsel