Exhibit A

News Plaintiffs' Proposed Searches (ECF 656-3 ¶ 3)	**OpenAI's Proposed Methodology**
"the prevalence of prompts and outputs reflecting news-related use cases"	Use classifiers to identify prevalence of news-related use cases
"the prevalence of regurgitated outputs containing News Plaintiffs' copyrighted content"	Using n-gram matching to identify outputs containing text from News Plaintiffs' articles
"reproduction of News Plaintiffs' copyrighted content in the Retrieval Augmented Generation ('RAG') process"	Search specific RAG-related data fields for News Plaintiffs' domains
"the prevalence of hallucinated outputs diluting News Plaintiffs' famous trademarks"	Use targeted keyword searches to find instances of ChatGPT outputs that attribute facts to News Plaintiffs