KEKER VAN NEST & PETERS LATHAM & WATKINS LLP MORRISON FOERSTER

November 10, 2025 **VIA ECF**

Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: **Unopposed Request for an Extension of Time for OpenAI to Answer Plaintiffs' Consolidated Class Action Complaint**
In re OpenAI Copyright Infringement Litigation, No. 1:25-md-03143-SHS-OTW
This document relates to: *Baldacci et al. v. OpenAI, Inc., et al.*, No. 1:25-md-3143-SHS-OTW

Dear Judge Stein:

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Local Civil Rule 6.1(a), and Section 1.E of Your Honor's Individual Practices, OpenAI respectfully submits this unopposed letter motion for a seven-day extension of time for OpenAI to respond to the Consolidated Class Action Complaint. Class Plaintiffs consented on the condition that OpenAI provide them with a list of its planned affirmative defenses, which OpenAI will do by November 10, 2025.

This is OpenAI's first request for an extension of time to respond to Plaintiffs' Consolidated Class Action Complaint. The requested extension will not affect any other deadlines in this action.

Thus, OpenAI respectfully requests that Your Honor extend the deadline from November 10, 2025 to November 17, 2025, as follows:

Event	Deadline
Last day for OpenAI to serve responsive pleadings to the Consolidated Class Action Complaint	**November 17, 2025**

Respectfully submitted,

MORRISON & FOERSTER LLP

/s/ Tiffany Cheung
Tiffany Cheung
Counsel for OpenAI

cc: All Counsel of Record (via ECF)

Nov 10, 2025
Application granted.
So Ordered.
Sidney H. Stein
U.S.D.J.