KEKER VAN NEST & PETERS LATHAM & WATKINS LLP MORRISON FOERSTER

November 12, 2025

VIA ECF

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

cc: All Counsel of Record (via ECF)

Re: ***The Court's Order, Dkt. 721, re the "LibGen Test File"***; *In re OpenAI Inc. Copyright Infringement Litigation*, Case No. 1:25-md-03143-SHS-OTW; This Document Relates to: Case Nos. 1:23-cv-08292, 1:23-cv-10211, 1:24-cv-00084, 1:25-cv-03291, 1:25-cv-03482, 1:25-cv-03483.

Dear Judge Wang:

OpenAI submits this letter pursuant to the Court's Order regarding the "LibGen Test File." Dkt. 721 at 2. Counsel for OpenAI met and conferred with counsel for Class Plaintiffs on November 6, 2025. OpenAI selects the second option from the Court's Order: "a 30(b)(6) deposition of up to 4 hours on this topic." *Id.* at 1.

Respectfully,

KEKER, VAN NEST & PETERS LLP[1]

/s/ Thomas E. Gorman
Thomas E. Gorman
(pro hac vice)

LATHAM & WATKINS LLP

/s/ Allison S. Blanco
Allison S. Blanco
(pro hac vice)

MORRISON & FOERSTER LLP

/s/ Caitlin Sinclaire Blythe
Caitlin Sinclaire Blythe
(pro hac vice)

[1] All parties whose electronic signatures are included herein have consented to the filing of this document.