VIA ECF

November 24, 2025

Hon. Ona T. Wang
United States Magistrate Judge
Southern District of New York

Re: *In re: OpenAI, Inc., Copyright Infringement Litigation*, 1:25-md-03143 (SHS) (OTW)
This Document Relates to: All Cases

Dear Magistrate Judge Wang:

Per the Court's Order at ECF 459, please find attached, on behalf of all parties, three charts that contain summaries of the discovery disputes that are the subject of pending motions as well as updates regarding the parties' previous discovery disputes. Exhibit A contains a chart summarizing the discovery disputes in the News Cases. Exhibit B contains a chart summarizing discovery disputes in both the News and Class Cases. Exhibit C contains a chart summarizing the discovery disputes in the Class Cases.

Respectfully submitted,

/s/ Davida Brook
Davida Brook
Susman Godfrey L.L.P.
Counsel for The New York Times Company
News Plaintiffs' Liaison Counsel

/s/ Justin Nelson
Justin Nelson
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Interim Lead Class Counsel

cc: All Counsel of Record (via ECF)