Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE INTERCEPT MEDIA, INC., Plaintiff, v. OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION Defendants.	No. 1:24-cv-01515-JSR

PLAINTIFF'S FIFTH SET OF REQUESTS FOR PRODUCTION TO OPENAI DEFENDANTS (NO. 12)

Please provide the following documents in compliance with the applicable federal rules, local rules, and standing orders of the Court.

REQUEST FOR PRODUCTION NO. 12

The articles identified in Exhibit 1 to the Second Amended Complaint (Dkt. 155) that were included in any of your training sets, in the form in which you obtained those articles.

Respectfully submitted,

/s/ Kyle Wallenberg
Jon Loevy (*pro hac vice*)
Michael Kanovitz (*pro hac vice*)
Stephen Stich Match (No. 5567854)
Matthew Topic (*pro hac vice*)
Steven Art (*pro hac vice*)
Thomas Kayes (*pro hac vice*)
Kyle Wallenberg (*pro hac vice*)
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Counsel for Plaintiff

Dated: May 13, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being service with a copy of this document via email on May 13, 2025.

/s/ Kyle Wallenberg
Kyle Wallenberg