Exhibit 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY, Plaintiff, v. MICROSOFT CORPORATION, *et. al.*, Defendants.	Case No. 1:23-cv-11195-SHS-OTW
DAILY NEWS, *et. al.*, Plaintiffs, v. MICROSOFT CORPORATION, *et. al.*, Defendants.	Case No. 1:24-cv-03285-SHS-OTW
THE CENTER FOR INVESTIGATIVE REPORTING, INC., Plaintiff, v. OPENAI, INC., *et. al.*, Defendants.	Case No. 1:24-cv-04872-SHS-OTW

PLAINTIFF THE CENTER FOR INVESTIGATIVE REPORTING, INC.'S FOURTH SET OF REQUESTS FOR PRODUCTION TO OPENAI DEFENDANTS AND MICROSOFT CORPORATION (NO. 67)

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

REQUEST FOR PRODUCTION NO. 67: The articles identified in Exhibits 1-4 of Plaintiff's First Amended Complaint (Dkt. 88) and Exhibit A to Plaintiff's First Set of Interrogatories (Nos. 1-11) that were included in any of your training sets, in the form in which you obtained those articles.

RESPECTFULLY SUBMITTED,

/s/ Kyle Wallenberg

Jonathan Loevy (*pro hac vice*)
Michael Kanovitz (*pro hac vice*)
Stephen Stich Match (No. 5567854)
Matthew Topic (*pro hac vice*)
Steve Art (*pro hac vice*)
Thomas Kayes *(pro hac vice)*
Kyle Wallenberg (*pro hac vice*)

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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