UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

OPENAI, INC. COPYRIGHT INFRINGEMENT LITIGATION

This document relates to:

The New York Times Company v. Microsoft Corporation, et al., No. 1:23-cv-11195-SHS-OTW

Daily News, LP v. Microsoft Corporation, et al., No. 1:24-cv-03285-SHS-OTW

The Center For Investigative Reporting, Inc., v. OpenAI, Inc., et al., No. 1:24-cv-04872-SHS-OTW

Case No. 25-md-03143-SHS-OTW

JOINT STIPULATION AND [PROPOSED] ORDER FOR LEAVE TO AMEND

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs The New York Times Company, Daily News Plaintiffs, and The Center for Investigative Reporting ("CIR") (collectively, the "News Plaintiffs"), and OpenAI, Inc., OpenAI LP, OpenAI GP LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Holdings, LLC, (collectively, "OpenAI"), in each case by and through their respective attorneys, as follows:

WHEREAS, OpenAI in the above-captioned matters filed its respective Answers to the operative Complaints on June 11, 2025 at *NYT* ECF 635, on May 20, 2025 at *DN* ECF 351, and on May 20, 2025 at *CIR* ECF 275;

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(2), OpenAI requests leave to amend its Answers to remove certain defenses;

WHEREAS, News Plaintiffs have reviewed the amended Answers and consent to

OpenAI's request to amend.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for News Plaintiffs and OpenAI in the above-captioned actions, that OpenAI is granted leave to file Amended Answers in the above-captioned actions.

IT IS SO STIPULATED.

Dated: December 2, 2025

/s/ Davida Brook
Davida Brook
SUSMAN GODFREY L.L.P.

/s/ Steven Lieberman
Steven Lieberman
ROTHWELL, FIGG, ERNST & MANBECK, P.C.

/s/ Stephen Match
Stephen Match
LOEVY & LOEVY

Counsel for The New York Times Company, The Daily News Plaintiffs,* and *The Center for Investigative Reporting

/s/ Joseph C. Gratz
Joseph C. Gratz (*pro hac vice*)
MORRISON & FOERSTER LLP

/s/ Margaret Graham
Margaret Graham
LATHAM & WATKINS LLP

/s/ Christopher S. Sun
Christopher S. Sun
KEKER, VAN NEST & PETERS LLP

Counsel for OpenAI Defendants

IT IS ORDERED.

Dated: _____

_____

HON. SIDNEY H. STEIN
United States District Judge