UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: *Baldacci*, No. 1:25-md-3143; *Authors Guild*, 1:23-cv-08292	Case No. 25-md-3143 (SHS) (OTW)

NOTICE OF ERRATA

Please take notice of the following errata and correction to OpenAI's November 24 letter brief re: contested download and output discovery, ECF 875: OpenAI inadvertently excluded the term "thousand" on page 3 of the letter brief in a reference to the volume of data and listed the number of employees' personal containers on which Plaintiffs are seeking discovery as "22" rather than "24." The reference to "15 terabytes" has been updated to "15 thousand terabytes" and "22 employees" updated to "24 employees." A corrected copy of the letter brief has been attached to this filing.

Dated: December 3, 2025

/s/ Allison S. Blanco
LATHAM & WATKINS LLP
Andrew M. Gass (*pro hac vice*)
andrew.gass@lw.com
San Francisco, CA 94111
Telephone: 415.391.0600

Sarang V. Damle
sy.damle@lw.com
Luke A. Budiardjo
luke.budiardjo@lw.com
1271 Avenue of the Americas
New York, NY 10020
Telephone: 212.906.1200

Elana Nightingale Dawson (*pro hac vice*)
elana.nightingaledawson@lw.com
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Telephone: 202.637.2200

Allison S. Blanco (*pro hac vice*)
allison.blanco@lw.com
650 Town Center Drive, Suite 20
Costa Mesa, CA 92626
Telephone: 714.540.1235

/s/ Caitlin S. Blythe
MORRISON & FOERSTER LLP
Joseph C. Gratz (*pro hac vice*)
jgratz@mofo.com
Tiffany Cheung (*pro hac vice*)
tcheung@mofo.com
Caitlin Sinclaire Blythe (*pro hac vice*)
cblythe@mofo.com
425 Market Street
San Francisco, CA 94105
Telephone: 415.268.7000

Rose S. Lee (*pro hac vice*)
roselee@mofo.com
707 Wilshire Boulevard, Suite 6000
Los Angeles, CA 90017
Telephone: 213.892.5200

/s/ Thomas E. Gorman
KEKER, VAN NEST & PETERS LLP
Robert A. Van Nest (*pro hac vice*)
rvannest@keker.com
R. James Slaughter (*pro hac vice*)
rslaughter@keker.com
Paven Malhotra
pmalhotra@keker.com
Michelle S. Ybarra (*pro hac vice*)
mybarra@keker.com
Thomas E. Gorman (*pro hac vice*)
tgorman@keker.com
633 Battery St.
San Francisco, CA 94111
Telephone: 415.391.5400

Attorneys for OpenAI