UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This document relates to: 23-cv-8292 23-cv-10211 24-cv-84 25-cv-3297 25-cv-3482 25-cv-3483	25-md-3143 (SHS) (OTW) Hon. Sidney H. Stein Hon. Ona T. Wang.

NOTICE OF OPENAI DEFENDANTS' OBJECTION TO ORDER AT MDL ECF 846 PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 72(A)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and exhibits annexed thereto, and all pleadings and proceedings referenced therein, Defendants OpenAI, Inc., OpenAI LLP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC move this Court, before the Honorable Sidney H. Stein in Courtroom 23A of the United States of District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to Federal Rule of Civil Procedure 72(a) vacating the order at MDL ECF 846, and any other further relief as this Court may deem just and proper.

Respectfully submitted,

Dated: December 8, 2025

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* All parties whose electronic signatures are included herein have consented to the filing of this document, as contemplated by Rule 8.5(b) of the Court's ECF Rules and Instructions.