UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: All Actions	25-md-03143 (SHS) (OTW) Hon. Sidney H. Stein

NOTICE OF OPENAI DEFENDANTS' OBJECTION TO ORDER AT MDL ECF 910 PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 72(A)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Edward A. Bayley 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 moves 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 discovery order at *MDL* ECF 910 § II(1)(iv), and any other further relief as this Court may deem just and proper.

LATHAM & WATKINS LLP

Dated: December 10, 2025

By: */s/ Margaret Graham*

Margaret Graham
1271 Avenue of the Americas
New York, NY 25015
margaret.graham@lw.com
Telephone: 212 906 1628

Attorney for Defendants
OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC