KEKER VAN NEST & PETERS LATHAM & WATKINS LLP MORRISON FOERSTER

June 3, 2025

VIA ECF

Hon. Sidney H. Stein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

cc: All Counsel of Record (via ECF)

Re: *In re: OpenAI, Inc., Copyright Infringement Litigation*, Case No. 1:25-md-03143

Dear Judge Stein:

On behalf of the OpenAI defendants,[1] we write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument on OpenAI's concurrently filed objection to Magistrate Judge Wang's May 13, 2025 Preservation Order at *MDL* ECF 33.

Respectfully,

KEKER, VAN NEST & PETERS LLP	LATHAM & WATKINS LLP	MORRISON & FOERSTER LLP
/s/ Edward A. Bayley	*/s/ Elana Nightingale Dawson*	*/s/ Joseph C. Gratz*
Edward A. Bayley*	Elana Nightingale Dawson	Joseph C. Gratz*

[1] OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.

* All parties whose electronic signatures are included herein have consented to the filing of this document.