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.; Case No. 1:23-cv-11195-SHS-OTW

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

Raw Story Media, Inc., et al. v. OpenAI Inc., et al.; Case No. 1:24-cv-01514-SHS-OTW

The Intercept Media, Inc. v. OpenAI, Inc., et al.; Case No. 1:24-cv-01515-SHS-OTW

Authors Guild, et al. v. OpenAI Inc., et al.; Case No. 1:23-cv-08292-SHS-OTW

Alter, et al. v. OpenAI Inc., et al.; Case No. 1:23-cv-10211-SHS-OTW

Tremblay, et al. v. OpenAI, Inc., et al.; Case No. 1:25-cv-03482-SHS-OTW

Case No. 1:25-md-03143-SHS-OTW

DECLARATION OF ROSE S. LEE IN SUPPORT OF MOTION TO WITHDRAW ERIC NIKOLAIDES AS COUNSEL OF RECORD

I, Rose S. Lee, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm of Morrison & Foerster LLP. Pursuant to Local Civil Rule 1.4, I submit this declaration in support of the motion to withdraw the appearance of Eric Nikolaides as counsel of record for defendants OpenAI Inc.; OpenAI GP LLC; OpenAI LLC; OpenAI OpCo LLC; OpenAI Global LLC; OAI Corporation LLC; OpenAI, Inc.; OpenAI

LP; OpenAI GP, LLC; OAI Corporation, LLC; OpenAI Holdings, LLC; OpenAI Startup Fund I LP; OpenAI Startup Fund GP I LLC; OpenAI Startup Fund Management LLC; OpenAI LP; OpenAI OpCo LLC; OpenAI Startup Fund GP I LLC; OpenAI Startup Fund I LP; OpenAI Startup Fund Management LLC; and OpenAI, LLC ("OpenAI Defendants") in the above-referenced actions.

2. As of December 5, 2025, Mr. Nikolaides is no longer be affiliated with the law firm of Morrison & Foerster LLP.

3. I will continue to represent the OpenAI Defendants, along with other attorneys from Morrison & Foerster LLP, Latham & Watkins LLP; and Keker, Van Nest & Peters LLP.

4. The withdrawal of Mr. Nikolaides as counsel of record will not cause or result in any delay or prejudice.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 16, 2025
Palo Alto, California

MORRISON & FOERSTER LLP

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