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Of Counsel
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VIA ECF

December 18, 2025

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

In re OpenAI, Inc., *Copyright Infringement Litigation*, 1:25-md-3143 (SHS) (OTW)

This Document Relates To: *U.S. News & World Report, L.P. v. OpenAI, Inc. et al.*, 1:25-cv-9912 (SHS) (OTW)

RE: Response to Show Cause Order Regarding Stay (MDL Dkt. 951)

Dear Judge Stein:

I write on behalf of the Plaintiff U.S. News & World Report, L.P. in response to this Court's show cause order of December 11, 2025 (MDL Dkt. 951) regarding a stay of *U.S. News & World Report, L.P. v. OpenAI, Inc. et al.*, 1:25-cv-9912 (SHS) (OTW) (the "Action").

The parties have conferred and agree that the Action should be stayed pending resolution of summary judgment motions in Case Nos. 23-cv-11195, 24-cv-4872, 24-cv-3285, and 24-cv-1515. A copy of the parties' Joint Stipulation and [Proposed] Order to Stay Proceedings is attached as Exhibit A to this letter and will be separately filed for the Court's consideration.

December 18, 2025

Respectfully submitted,

/s/ Steven Lieberman
Steven Lieberman
Rothwell, Figg, Ernst & Manbeck, P.C.

cc: All Counsel of Record (via ECF)
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