UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: ZIFF DAVIS, INC. et al v. OPENAI, INC. et al., No. 1:25-cv-04315	25-md-3143 (SHS) (OTW) Hon. Sidney H. Stein Hon. Ona T. Wang

NOTICE OF MOTION TO STAY

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the accompanying Declaration of Andrew S. Bruns, dated December 19, 2025, and Memorandum of Law, the undersigned hereby moves this Court on behalf of OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, and OpenAI Holdings, LLC (collectively, "Defendants"), by and through counsel, before the Honorable Sidney H. Stein, United States District Judge for the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 23A, New York, New York 10007-1312, for an order staying Plaintiffs Ziff Davis, Inc., Ziff Davis, LLC, IGN Entertainment, Inc., Everyday Health Media, LLC, Mashable, Inc., and CNET Media, Inc's First Amended Complaint.

Dated: December 19, 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.