

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

OPENAI, INC.

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

This Declaration Relates To:

Case No. 1:25-cv-04315

Case No. 1:24-cv-01515

Case No. 1:24-cv-04872

Case No. 1:23-cv-11195

Case No. 1:24-cv-03285

DECLARATION OF SANJAY KRISHNAN, PH.D. IN SUPPORT OF OPENAI'S
OPPOSITION TO NEWS PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Signed in Hinsdale, IL, on Oct 22, 2026



Sanjay Krishnan, Ph.D.

**FILED UNDER SEAL IN
ITS ENTIRETY**