UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re OpenAI, Inc. Copyright Infringement Litigation This Document Relates to: *Times Publishing Co. et al. v. Microsoft Corp. et al.*, No. 1:26-cv-08082-SHS-OTW	Case No. 1:25-md-3143-SHS-OTW **JOINT STIPULATION AND [PROPOSED] ORDER STAYING *TIMES PUBLISHING COMPANY* ACTION**

Plaintiffs Times Publishing Company; Alternative Newsweekly Foundation; Austin Chronicle Corp.; Boston Neighborhood News, Inc.; Cape Gazette, Ltd.; Chapman Hyperlocal Media, Inc.; Conrad Communications, LLC; Contemporary Media, Inc.; East Greenwich News; EcoRI Inc.; Florida Trend Magazines, Inc.; HD Media Company, LLC; Massachusetts Media Fund, Inc.; New Hampshire Center for Public Interest Journalism; Noisy Creek, Inc.; Richland Times, LLC; San Francisco Jewish Community Publications, Inc.; SwimSwam Partners, LLC; TAP IP, LLC; The Alternative Press, LLC; The Calais Advertiser, Inc.; The Hudson Valley Local News Lab Inc.; The Jewish Link of Bergen County and Northern NJ, LLC; The Machias Valley News Observer, Inc.; Tucson Investigative Reporting Center Inc.; We-Ha.com LLC; and Inland Publications, Inc. ("Plaintiffs") and Defendants Microsoft Corporation; OpenAI, Inc.; OpenAI LP; OpenAI GP, LLC; OpenAI, LLC; OpenAI OpCo, LLC; OpenAI Global, LLC; OAI Corporation, LLC; OpenAI Holdings, LLC; OpenAI Foundation; and OpenAI Group PBC ("Defendants") (collectively, the "Parties"), hereby stipulate and agree as follows:

WHEREAS, on April 3, 2025, the United States Judicial Panel on Multidistrict Litigation ordered various actions brought against Defendants be centralized and transferred to the Southern District of New York. *In re OpenAI, Inc., Copyright Infringement Litigation*, No. 1:25-md-03143-

SHS-OTW (the "MDL");

WHEREAS, on September 16, 2026, Plaintiffs filed the above-captioned case in the Southern District of New York (the "Action");

WHEREAS, on September 18, 2026, this Action was accepted as a consolidated MDL case;

WHEREAS, on October 8, 2026, this Court entered a show cause order regarding a stay of this Action "pending resolution of summary judgment motions in the other active cases in this multidistrict litigation." *See* MDL ECF No. 2093.

WHEREAS, this Action has common factual and legal issues with the pre-existing MDL actions, such that forthcoming rulings in the MDL may address questions that overlap with questions in this Action and may inform and streamline the resolution of similar issues in this Action;

WHEREAS, the Parties agree that a stay of this Action will allow the existing schedule in the MDL to be maintained and promote judicial economy and consistency;

WHEREAS, Defendants have not been served in this Action and, by entering into this stipulation, do not waive service and expressly reserve any and all defenses.

NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES THAT, subject to the Court's approval, as follows:

1. All proceedings and deadlines in the above-captioned Action are hereby stayed pending resolution of summary judgment motions in the other active cases in this MDL.

2. Within 30 days of rulings on such motion(s) in the MDL, the Parties shall file a joint status report in this Action to propose a case management conference and any appropriate further proceedings in light of the MDL decision.

3. While this stay is in effect, any party may move to lift the stay for good cause shown. Nothing in this stipulation shall preclude any party from seeking such relief, if necessary, or from seeking any other appropriate relief from the Court.

Respectfully submitted,

Dated: October 14, 2026

/s/ Matthew J. Platkin

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* All parties whose electronic signatures are included in this filing have provided consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

SO ORDERED this _____ day of _____, 2026.

_____
Hon. Sidney H. Stein
United States District Judge