UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re OpenAI, Inc. Copyright Infringement Litigation This Document Relates to: *USA TODAY Co. et al. v. OpenAI Foundation et al.*, No. 1:26-cv-08892-SHS-OTW	Case No. 1:25-md-3143-SHS-OTW **JOINT STIPULATION AND ORDER STAYING *USA TODAY* ACTION**

Plaintiffs USA TODAY Co., Inc.; Gannett Satellite Information Network, LLC; Gannett GP Media, Inc.; The Courier-Journal, Inc.; Des Moines Register and Tribune Company; Detroit Free Press, Inc.; Detroit Newspaper Partnership, L.P.; CA Florida Holdings, LLC; Scripps NP Operating, LLC; CA North Carolina Holdings, Inc.; GateHouse Media Oklahoma Holdings, Inc.; Journal Sentinel Inc.; GateHouse Media Ohio Holdings II, Inc.; and Phoenix Newspapers, Inc. ("Plaintiffs") and Defendants OpenAI Foundation; OpenAI GP, LLC; OAI International, Inc.; OpenAI OpCo, LLC; OpenAI Global, LLC; OAI Corporation; 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 October 8, 2026, Plaintiffs filed the above-captioned case in the Southern District of New York (the "Action");

WHEREAS, on October 14, 2026, this Action was accepted as a consolidated MDL case;

WHEREAS, on October 15, 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. 2105.

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 by entering into this stipulation, 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.

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Respectfully submitted,

Dated: October 16, 2026

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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 16th day of October 2026, 2026.

Hon. Sidney H. Stein
United States District Judge