UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION	**MDL No. 1:25-md-03143 (SHS) (OTW)**
This Document Relates To: *All Related Cases*	**Hon. Sidney H. Stein**

NOTICE OF MOTION BY PROPOSED AMICI CURIAE E.H. AND W.E. FOR LEAVE TO FILE AMICUS BRIEF

PLEASE TAKE NOTICE that, pursuant to the Court's inherent authority and its Orders of August 7, 2026 (Dkt. No. 1663) and September 24, 2026 (Dkt. No. 2049), proposed amici curiae E.H. and W.E., high school students proceeding pro se, hereby move this Court for leave to file the accompanying brief as amici curiae in support of Plaintiffs in connection with the parties' motions for summary judgment.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law, the proposed amicus brief (Exhibit A), the proposed order (Exhibit B), and such other matters as the Court may consider. In support of this motion, the

proposed amici respectfully refer the Court to the accompanying Memorandum of Law, which sets forth the grounds for granting leave.

Dated: October 29th, 2026

Respectfully submitted,

/s/ E.H.

E.H.

Contact information provided to Court

Pro Se Amicus Curiae

/s/ W.E.

W.E.

Contact information provided to Court

Pro Se Amicus Curiae