

EXHIBIT C

1 BY ATTORNEY MOLO:

2 Q. I mean, excuse me, what was your concern
3 about them leaking?

4 A. It was a generalized concern.

13:55:51 5 Q. Okay.

6 You drafted a similar memo that was
7 acritical of Greg Brockman; correct?

8 A. Yes.

9 Q. You sent that to the board too?

13:55:57 10 A. Yes.

11 Q. Does a version of your memo about Greg
12 Brockman exist anywhere in any form?

13 ATTORNEY AGNOLUCCI: Object to form.

14 THE WITNESS: I believe various lawyers
13:56:30 15 have a copy.

16 BY ATTORNEY MOLO:

17 Q. Who has a copy?

18 A. Various lawyers.

19 Q. Which lawyers would those be?

13:56:38 20 ATTORNEY AGNOLUCCI: Object to form.

21 And, obviously, I'm instructing the
22 witness not to answer with respect to any documents
23 that he may have provided to his own counsel. So if
24 you know --

13:56:51 25 ATTORNEY MOLO: Well, that doesn't make

1 answer?

2 A. That's what I'm hearing.

3 ATTORNEY MOLO: Okay.

4 ATTORNEY AGNOLUCCI: And I think there's

13:58:58 5 some ambiguity about -- in his mind what's

6 privileged and so.

7 ATTORNEY MOLO: He knows what's in his

8 mind.

9 ATTORNEY AGNOLUCCI: I'm happy to meet and

13:59:07 10 confer further, but I think we need to move on.

11 ATTORNEY MOLO: I'm going to show you

12 Exhibit 20.

13 (Exhibit 20 was marked for

14 identification.)

13:59:30 15 BY ATTORNEY MOLO:

16 Q. This is an article from "The Wall Street

17 Journal" dated March 28th of 2025; byline by

18 Keith -- excuse me -- Hagey; headline "The Secrets

19 of Misdirection Behind Sam Altman's Firing From

13:59:47 20 OpenAI."

21 You're familiar with this article?

22 A. No.

23 Q. Okay.

24 At page 440, at the bottom of the article,

13:59:59 25 if you look at the third line, there's a sentence

1 THE WITNESS: I don't have an affirmative
2 recollection.

3 BY ATTORNEY MOLO:

4 Q. Okay.

19:44:12 5 Is it your belief that Sam Altman will
6 have a financial interest in OpenAI someday?

7 ATTORNEY EDDY: Objection.

8 THE WITNESS: I recall reading about it in
9 the news, but I don't know how accurate it is.

19:44:25 10 BY ATTORNEY MOLO:

11 Q. Okay.

12 When you left OpenAI, you resigned in May
13 of 2024; is that right?

14 A. I don't remember, but it sounds within the
19:44:44 15 range.

16 Q. Why did you leave?

17 ATTORNEY AGNOLUCCI: Object to form.

18 THE WITNESS: Ultimately, I had a big new
19 vision, and it felt more suitable for a new company.

19:44:58 20 BY ATTORNEY MOLO:

21 Q. Okay.

22 At the time immediately prior to your
23 departure of OpenAI, did you have an equity stake in
24 the company?

19:45:09 25 A. Yes.

1 I just want to make sure that it's clear
2 on record.

3 ATTORNEY AGNOLUCCI: I'm instructing him
4 not to answer the amount of his financial interest.

19:46:11 5 He can answer whether he has an interest, but he
6 cannot quantify it.

7 BY ATTORNEY MOLO:

[REDACTED]

[REDACTED]

19:46:23 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19:46:29 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 BY ATTORNEY MOLO:

19:46:47 20 Q. Okay.

21 Do you still have a financial interest in
22 OpenAI?

23 A. Yes.

24 Q. Okay.

19:46:54 25 Has the amount of the interest increased

1 or decreased since you've left OpenAI?

2 A. Increased.

3 Q. Okay.

4 And has the value of the interest

19:47:05 5 increased or decreased since you got --

6 A. Sorry. Can you repeat the previous
7 question.

8 Q. Okay.

9 So -- okay.

19:47:11 10 Okay.

11 Has the value of your interest in OpenAI

12 increased or decreased since you left OpenAI?

13 A. Increased.

14 Q. Okay.

19:47:19 [REDACTED]

[REDACTED]

[REDACTED]

18 ATTORNEY AGNOLUCCI: Same instruction not

19 to answer.

19:47:31 20 Don't answer that.

21 BY ATTORNEY MOLO:

22 Q. Sir?

23 ATTORNEY AGNOLUCCI: He's not answering

24 the question.

25 ///

1 Ilya, you testified a few moments ago that
2 you believe that OpenAI may be paying your legal
3 fees; is that right?

4 A. Yes.

20:00:57

5 Q. Okay.

6 Are you deriving any other financial
7 benefits from OpenAI at this time?

8 A. Nothing beyond what you've already
9 mentioned.

20:01:07

10 Q. Okay.

11 And then other than the instructions from
12 your lawyer here today, do you believe there's any
13 reason you cannot disclose the details of your
14 financial interest in OpenAI?

20:01:18

15 A. No.

16 ATTORNEY AGNOLUCCI: Object to form.

17 BY ATTORNEY MOLO:

18 Q. Okay.

20:01:23

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 ATTORNEY AGNOLUCCI: Object to form.

24 ATTORNEY EDDY: Objection.

20:01:33

25 THE WITNESS: I was not aware.

360

1 ATTORNEY COHEN: That has a protective
2 order. You should withdraw the question.

3 ATTORNEY EDDY: That's a violation of the
4 protective order.

20:01:42 5 ATTORNEY MOLO: Well, that was certainly
6 not my intention. I'll withdraw the question.

7 Anything else?

8 No further questions.

9 Thank you very much, Ilya.

20:01:55 10 THE WITNESS: Okay.

11 ATTORNEY MOLO: We have issues, though, in
12 terms of the deposition remaining open because
13 there's documents that have not been produced to us.
14 We have the issue of the Brockman report, which we
20:02:14 15 learned of today, and you possess it, and it's not
16 been produced. And we have these issues about, you
17 know, Ilya's financial interest.

18 So this -- we're not done.

19 ATTORNEY AGNOLUCCI: We obviously
20:02:28 20 disagree. As for the Brockman memo, it was
21 referenced in one of the exhibits that you used in
22 your questioning. You've known about it for some
23 time. And perhaps you should talk to your colleague
24 who handled the meet-and-confer because the memo was
20:02:45 25 never requested. You all were aware that it