

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARK WALTERS)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:23-cv-03122-
)	MLB
OpenAI, L.L.C.,)	
)	
Defendant.)	
)	

**DEFENDANT OPENAI’S RESPONSE TO
ORDER DATED SEPTEMBER 22, 2023**

Defendant OpenAI, L.L.C., (“OpenAI”) respectfully submits this Response to the Court’s September 22, 2023 Order, directing OpenAI to “affirmatively identify by name each member of an LLC and then allege whatever specific facts are necessary to establish the citizenship of that member” for the purpose of establishing subject matter jurisdiction.

In response, OpenAI withdraws its notice of removal, as OpenAI is not in a position to provide further information beyond its prior filings. *See, e.g.*, Dkt. 22.

October 6, 2023

Respectfully submitted,

By: /s/ Brendan Krasinski
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of October 2023, I electronically filed the foregoing RESPONSE TO ORDER DATED SEPTEMBER 22, 2023 with the Clerk of Court using the CM/ECF system, which will send e-mail notification of such filing to all attorneys of record.

Dated: October 6, 2023

By: /s/ Brendan Krasinski
Brendan Krasinski