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Via ECF

ORAL ARGUMENT REQUESTED

Hon. Margaret M. Garnett, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

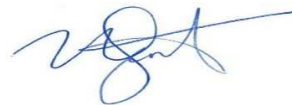   Re: *Huckabee et al. v. Meta Platforms, Inc. et al.*, No. 1:23-cv-09152-MMG

Dear Judge Garnett:

Pursuant to Paragraph II.B.5 of Your Honor's Individual Rules and Practices, Defendants Bloomberg L.P. and Bloomberg Finance L.P. (together, "Bloomberg") submit this letter further explaining their request for oral argument on their Motion to Dismiss Plaintiffs' First Amended Complaint (the "Motion").

As the Court previously recognized, this action involves "novel and interesting legal issues involving large language models and artificial intelligence." (March 19, 2024 Conference Transcript at 8:22–25). Indeed, as of this writing, Bloomberg is aware of only a small handful of decisions discussing Large Language Models in the context of copyright claims, and none address issues of fair use, which are front and center in the present Motion.

While the context in which these issues arise may be novel, however, the relevant legal principles and pleading standards are not. Accordingly, Bloomberg submits that further opportunity for the parties and the Court to discuss the issues would be beneficial and appropriate.

Respectfully submitted,

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