

SUSMAN GODFREY L.L.P

June 4, 2024

Hon. Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 23A  
New York, New York 10007

Re: *The New York Times Company v. Microsoft Corporation, et al.*,  
Case No.: 23-cv-11195-SHS: OpenAI's May 23 Letter Motion to Compel

Dear Judge Stein:

I write on behalf of The New York Times Company ("The Times") to provide an update regarding the OpenAI Defendants' May 23, 2024 letter motion to compel (Dkt. 124). The OpenAI Defendants join in this update.

The Times and the OpenAI Defendants have met and conferred and reached agreement on the first issue raised in the May 23 letter motion. The Times will substantially complete document productions for the OpenAI Defendants' First Set of Requests for Production by July 19, 2024. The Times will make rolling productions up to that July 19 deadline as well.

The Times and the OpenAI Defendants remain at an impasse on the second issue raised in the May 23 letter motion.

Respectfully submitted,

/s/ Ian B. Crosby

Ian B. Crosby  
Susman Godfrey L.L.P.

/s/ Steven Lieberman

Steven Lieberman  
Rothwell, Figg, Ernst & Manbeck

cc: All Counsel of Record (via ECF)