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March 11, 2024

VIA ECF

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

Dear Judge Stein:

I write on behalf of Plaintiff, The New York Times Company (“The Times”), pursuant to Rule 2.F of Your Honor’s Individual Practices. The Times respectfully requests oral argument on the OpenAI Defendants’ partial motion to dismiss. Dkt. 51. The Times believes that oral argument will assist the court in segregating the non-pertinent factual allegations raised in the OpenAI Defendants’ moving papers from the otherwise straightforward issues on which they have actually moved.

Respectfully submitted,

/s/ Ian B. Crosby

Ian B. Crosby

cc: All Counsel of Record (via ECF)