

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC., ALTERNET
MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

No. 1:24-cv-01514-CM

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the annexed Memorandum of Law, the Proposed First Amended Complaint, and the exhibits thereto, the undersigned hereby moves this Court on behalf of Plaintiffs Raw Story Media, Inc., and AlterNet Media, Inc. for an order (1) granting Plaintiffs leave to amend their complaint under Fed. R. Civ. P. 15(a)(2), or (2) in the alternative, for leave to continue taking jurisdictional discovery under *Kamen v. Am. Tel. & Tel. Co.*, 791 F.2d 1006, 1011 (2d Cir. 1986).

RESPECTFULLY SUBMITTED,

/s/ Stephen Stich Match

Jon Loevy (*pro hac vice*)
Michael Kanovitz (*pro hac vice*)
Lauren Carbajal (*pro hac vice*)
Stephen Stich Match (No. 5567854)
Matthew Topic (*pro hac vice*)
Thomas Kayes (*pro hac vice*)
Steven Art (*pro hac vice*)
Kyle Wallenberg (*pro hac vice*)

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