UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: THE NEW YORK TIMES COMPANY v. MICROSOFT CORPORATION, et al., No. 23-cv-11195	25-md-03143 (SHS) (OTW) Hon. Ona T. Wang **STIPULATION AND ORDER TO TERMINATE OPENAI'S ONGOING OBLIGATIONS UNDER THE PRESERVATION ORDER AT ECF 33**

News Plaintiffs and OpenAI (the "Parties"), by and through their respective counsel of record, hereby submit this stipulation to terminate OpenAI's ongoing obligations under the order entered at ECF 33 (the "Preservation Order") with the following terms:

1. Subject to Paragraphs 3–4 below, OpenAI's ongoing obligation to "preserve and segregate all output log data that would otherwise be deleted on a going forward basis" is terminated as of September 26, 2025.

2. OpenAI will continue to preserve the output log data already preserved and segregated pursuant to the Preservation Order prior to September 26, 2025, except for output log data corresponding to user requests originating from within the European Economic Area, Switzerland, or the United Kingdom.

3. Notwithstanding the above, OpenAI has confirmed that it has conducted a search for accounts associated with the domains identified by News Plaintiffs (listed in Appendix A) and will preserve on a going-forward basis output log data associated with those accounts irrespective of originating location. OpenAI agrees to meet and confer in good faith regarding requests by News Plaintiffs to preserve output log data originating from accounts associated with additional domains.

4. For avoidance of doubt, this stipulation relates entirely to the segregated data tables that OpenAI created in response to the Preservation Order. It does not purport to waive, modify, or otherwise affect the parties' obligations under Federal Rule of Civil Procedure 37(e). The Parties reserve all rights, including to seek further relief on this issue.

IT IS SO STIPULATED.

Dated: October 9, 2025

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On behalf of The Center for Investigative Reporting

IT IS ORDERED that the foregoing Agreement is approved.

Dated: October 9, 2025

HONORABLE ONA T. WANG
United States Magistrate Judge

APPENDIX A

cryptonews.com.au

enews.com.ng

inty.news

liverpooldigest.co.uk

mainstream.news

techstory.in

newsr.in

tajahindinews.in

teachernews.in

labrujuladigital.es

tramitesenandalucia.es

liverpoolbuzz.co.uk

oncob2b.co.kr

berealinfo.com

blockchain.news

Bostontimes.org

incomeinvestinginsider.com

infoguidenigeria.com

informedamericantoday.com

internewscast.com

newsfeedus.com

Nynewsdaily.org

psychnewsdaily.com

technewztop.org

thecurrent-online.com

theinscribermag.com

tibunnews.com

time.news

breakinglatest.news

chiangraitimes.com

lesrapporteurs.com

naijanews.com

newsdirectory3.com

southwestjournal.com

countylocalnews.com

newscrab.com

timebusinessnews.com

maxnews.info

itimesbiz.com

irelandtopnews.com

mhna98.com

the-tech-vortex.com

coinworldstory.com

internationalnewsandviews.com

deccanherald.com

newstimeslink.com

usnewslead.com

worldnewsera.com

infobaenews.com

talesbuzz.com

theglobalherald.com

fichas-tecnicas.com

dotcommagazine.com

editorializenews.com

newsagentweb.com

currentaffairs.adda247.com

usmagazine.news

storifynews.com

smallpressnews.com

qmunicatemagazine.com

USNewsper.com

latribunedujellyrodger.com

maoi.org

thetechedvocate.org

mtm-news.com

knowworldnow.com

timelymagazine.com

voymedia.com

facts.net

expotimesonline.net

via.news

uniquenewsonline.com

allnewspress.com

news.nayag.com

losanglesnewswire.com

bdjobnews.com

nouvelles-du-monde.com

ledernierereheure.com

Lesactualites.news

traveltrade.today

noticiasdeemprego.com.br

sabkuchhnews.com

uni2noticias.com

tribuneonlineng.com

dnyuz.com

newsnow.com

dissenter.com

parler.com

dmsretail.com