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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

ELON MUSK, et al.,

Plaintiffs,

v.

SAMUEL ALTMAN, et al.,

Defendants.

Case No. 4:24-cv-04722-YGR

OPENAI DEFENDANTS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER OTHER PARTIES' MATERIAL SHOULD BE SEALED

Pursuant to Civil Local Rule 7-11 and 79-5(f), the OpenAI Defendants hereby move to file portions of the Joint Discovery Letter ("Letter"), and Exhibits E, F, G, and H attached thereto under seal.

The highlighted portions of the Letter reflect information that Plaintiffs and non-Party Sam Teller has designated as "CONFIDENTIAL" and "HIGHLY CONFIDENTIAL" pursuant to the Stipulated Protective Orders entered in this case (Dkts. 171, 270). Exhibits E, F, and G were produced by Shivon Zilis and designated as "CONFIDENTIAL" pursuant to the Stipulated Protective Orders. Exhibit H was produced by Sam Teller and designated as "CONFIDENTIAL" pursuant to the Stipulated Protective Orders. Pursuant to Civ. L.R. 79-5(f)(3), Plaintiffs and Mr. Teller bear the burden of establishing that their designated materials are sealable, so they must each "file a statement and/or declaration as described in subsection (c)(1)" of Civil Local Rule 79-5 within seven days should they wish to keep any portion of the Letter or Exhibits E, F, G, or H under seal. *Id.*

Accordingly, in connection with the Letter, Defendants have provisionally filed under seal the documents listed below:

Document and/or Portion of Document	**Designator**
Joint Discovery Letter, Dkt. No. 271	Plaintiffs
Exhibit E	Shivon Zilis
Exhibit F	Shivon Zilis
Exhibit G	Shivon Zilis
Exhibit H	Sam Teller

Date: September 19, 2025

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/s/ Jordan Eth

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