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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ELON MUSK, et al.,

Plaintiffs,

v.

SAMUEL ALTMAN, et al.,

Defendants.

Case No. 4:24-cv-04722-YGR (TSH)

PLAINTIFF'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER OTHER PARTIES' MATERIAL SHOULD BE SEALED

Pursuant to Civil Local Rule 7-11 and 79-5(f), Plaintiff Elon Musk hereby moves to file portions of Plaintiff's Administrative Motion to Authorize Alternative Service of Deposition Subpoena and Compel Compliance (the "Motion"), the accompanying Declaration of Michael Conner ("Conner Declaration"), the accompanying Declaration of Jaymie Parkkinen ("Parkkinen Declaration"), and exhibits 1, 2, 4, 8, 9, and 10 thereto, under seal.

The highlighted portions of the Motion, accompanying declarations, and exhibits reflect information that the OpenAI and Microsoft defendants and non-parties Ilya Sutskever, Tasha McCauley, and Ermira Murati have designated or are reasonably expected to designate as "CONFIDENTIAL" and "HIGHLY CONFIDENTIAL" under the Stipulated Protective Orders entered in this case, Dkts. 171, 270.

Accordingly, Plaintiff has provisionally filed portions of the documents listed below under seal:

Document	Designator / Anticipated Designator of Sealed Information
Motion	OpenAI Defendants, Microsoft Corporation, Ilya Sutskever, Tasha McCauley
Conner Declaration	Emira Murati
Parkkinen Declaration	Emira Murati
Parkkinen Declaration, Exhibit 1	Emira Murati
Parkkinen Declaration, Exhibit 2	Emira Murati
Parkkinen Declaration, Exhibit 4	Emira Murati
Parkkinen Declaration, Exhibit 8	Emira Murati
Parkkinen Declaration, Exhibit 9	Emira Murati
Parkkinen Declaration, Exhibit 10	Emira Murati

DATED: October 7, 2025

Respectfully Submitted,

TOBEROFF & ASSOCIATES, P.C.

/s/ Jaymie Parkkinen
Jaymie Parkkinen

Attorneys for Plaintiff Elon Musk