MARC TOBEROFF (CA SBN 188547)
MToberoff@toberoffandassociates.com
JAYMIE PARKKINEN (CA SBN 318394)
JParkkinen@toberoffandassociates.com
TOBEROFF & ASSOCIATES, P.C.
23823 Malibu Road, Suite 50-363
Malibu, CA 90265
Telephone: (310) 246-3333

STEVEN F. MOLO (*pro hac vice*)
ROBERT K. KRY (*pro hac vice*)
JENNIFER M. SCHUBERT (*pro hac vice*)
MOLOLAMKEN LLP
430 Park Avenue
New York, NY 10022
Telephone: (212) 607-8160

Attorneys for Plaintiffs Elon Musk and X.AI Corp.

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

Assigned to Hon. Thomas S. Hixson

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

Pursuant to Civil Local Rule 7-11 and 79-5(f), Plaintiffs Elon Musk and X.AI Corp. hereby move to file portions of its Letter Brief addressing Motions to Compel Additional Deposition Testimony and to Compel Production ("Letter Brief") and the accompanying exhibits thereto, under seal.

The highlighted portions of the Letter Brief and exhibits reflect information that the OpenAI and Microsoft defendants and non-party Ilya Sutskever have designated as "HIGHLY CONFIDENTIAL" under the Stipulated Protective Orders entered in this case, Dkts. 171, 270, and under the September 14, 2025 Agreement Regarding Production and Use of Highly Sensitive Document.

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

Document	Designator of Sealed Information
Letter Brief	OpenAI Defendants, Microsoft Corporation, Ilya Sutskever
Letter Brief, Exhibit 1	Ilya Sutskever
Letter Brief, Exhibit 2	Ilya Sutskever
Letter Brief, Exhibit 3	Ilya Sutskever

DATED: October 8, 2025

Respectfully Submitted,

MOLOLAMKEN LLP

/s/ Steven F. Molo
Steven F. Molo

Attorney for Plaintiffs Elon Musk and X.AI Corp.