JORDAN ETH (CA SBN 121617)
JEth@mofo.com
WILLIAM FRENTZEN (CA SBN 343918)
WFrentzen@mofo.com
DAVID J. WIENER (CA SBN 291659)
DWiener@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

WILLIAM SAVITT (admitted *pro hac vice*)
WDSavitt@wlrk.com
BRADLEY R. WILSON (admitted *pro hac vice*)
BRWilson@wlrk.com
SARAH K. EDDY (admitted *pro hac vice*)
SKEddy@wlrk.com
STEVEN WINTER (admitted *pro hac vice)*
SWinter@wlrk.com
NATHANIEL CULLERTON (admitted *pro hac vice*)
NDCullerton@wlrk.com
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, NY 10019
Telephone: (212) 403-1000
Facsimile: (212) 403-2000

Attorneys for Defendants Samuel Altman, Gregory Brockman, OpenAI, Inc., OpenAI L.P., OpenAI, L.L.C., OpenAI GP, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, OpenAI Holdings, LLC, OpenAI Startup Fund Management, LLC, OpenAI Startup Fund GP I, L.L.C., OpenAI Startup Fund I, L.P., OpenAI Startup Fund SPV GP I, L.L.C., OpenAI Startup Fund SPV GP II, L.L.C., OpenAI Startup Fund SPV GP III, L.L.C., OpenAI Startup Fund SPV GP IV, L.L.C., OpenAI Startup Fund SPV I, L.P., OpenAI Startup Fund SPV II, L.P., OpenAI Startup Fund SPV III, L.P., OpenAI Startup Fund SPV IV, L.P., Aestas Management Company, LLC, and Aestas LLC

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

SUPPLEMENTAL AND AMENDED RULE 7.1 CORPORATE DISCLOSURE STATEMENT

Defendants OpenAI, Inc., OpenAI L.P., OpenAI, L.L.C., OpenAI GP, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, OpenAI Holdings, LLC, OpenAI Startup Fund Management, LLC, OpenAI Startup Fund GP I, L.L.C., OpenAI Startup Fund I, L.P., OpenAI Startup Fund SPV GP I, L.L.C., OpenAI Startup Fund SPV GP II, L.L.C., OpenAI Startup Fund SPV GP III, L.L.C., OpenAI Startup Fund SPV GP IV, L.L.C., OpenAI Startup Fund SPV I, L.P., OpenAI Startup Fund SPV II, L.P., OpenAI Startup Fund SPV III, L.P., OpenAI Startup Fund SPV IV, L.P., AESTAS Management Company, LLC, and AESTAS LLC by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 7.1, hereby provide the following supplemented and amended version of their previously filed Rule 7.1 statement:

1. On October 28, 2025, OpenAI, Inc. changed its name to OpenAI Foundation. OpenAI Foundation states that it has no parent corporation and that no publicly held corporation has a financial interest in OpenAI Foundation of 10% or more.

2. OpenAI L.P. changed its name in January 2023 to OpenAI OpCo, L.L.C. OpenAI OpCo, L.L.C. states that it is a subsidiary of OpenAI Global, L.L.C. and that no publicly held corporation has a financial interest in OpenAI OpCo, L.L.C. of 10% or more. OpenAI OpCo, L.L.C. states that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global LLC of 10% or more.

3. OpenAI, L.L.C. states that it is a subsidiary of OpenAI OpCo, L.L.C. and that no publicly held corporation has a financial interest in OpenAI, L.L.C. of 10% or more. OpenAI L.L.C. further states that it is an indirect subsidiary of OpenAI Global, LLC, and Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global LLC of 10% or more.

4. OpenAI GP, L.L.C. states that it is a subsidiary of OpenAI Group PBC and that no publicly held corporation has a financial interest in OpenAI GP, L.L.C. of 10% or more.

5. OpenAI Global, LLC states that it is a subsidiary of OAI Corporation and OpenAI Global HoldCo, Inc. and that Microsoft Corporation is a publicly held corporation that has a financial interest in OpenAI Global, LLC of 10% or more.

6. OAI Corporation, LLC converted in September 2023 from a limited liability company to a corporation named OAI Corporation. OAI Corporation states that it is a subsidiary of OpenAI Holdings, LLC and that no publicly held corporation has a financial interest in OAI Corporation of 10% or more.

7. OpenAI Holdings, LLC states that it is a subsidiary of OpenAI Group PBC and that no publicly held corporation has a financial interest in OpenAI Holdings, LLC of 10% or more.

8. OpenAI Startup Fund Management, LLC states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund Management, LLC of 10% or more.

9. OpenAI Startup Fund GP I, L.L.C. states that it has no parent corporation and that no publicly held corporation has a financial interest in OpenAI Startup Fund GP I, L.L.C. of 10% or more.

10. OpenAI Startup Fund I, L.P. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that Microsoft Corporation has a financial interest in OpenAI Startup Fund I, L.P. of 10% or more.

11. OpenAI Startup Fund SPV GP I, L.L.C. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV GP I, L.L.C. of 10% or more.

12. OpenAI Startup Fund SPV GP II, L.L.C. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV GP II, L.L.C. of 10% or more.

13. OpenAI Startup Fund SPV GP III, L.L.C. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV GP III, L.L.C. of 10% or more.

14. OpenAI Startup Fund SPV GP IV, L.L.C. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV GP IV, L.L.C. of 10% or more.

15. OpenAI Startup Fund SPV I, L.P. states that it is a subsidiary of OpenAI Startup Fund SPV GP I, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV I, L.P. of 10% or more.

16. OpenAI Startup Fund SPV II, L.P. states that it is a subsidiary of OpenAI Startup Fund SPV GP II, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV II, L.P. of 10% or more.

17. OpenAI Startup Fund SPV III, L.P. states that it is a subsidiary of OpenAI Startup Fund SPV GP III, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV III, L.P. of 10% or more.

18. OpenAI Startup Fund SPV IV, L.P. states that it is a subsidiary of OpenAI Startup Fund SPV GP IV, L.L.C. and that no publicly held corporation has a financial interest in OpenAI Startup Fund SPV IV, L.P. of 10% or more.

19. AESTAS Management Company, LLC states that it has no parent corporation and that no publicly held corporation has a financial interest in AESTAS Management Company, LLC of 10% or more.

20. AESTAS LLC states that it is a subsidiary of AESTAS Management Company, LLC and that no publicly held corporation has a financial interest in AESTAS LLC of 10% or more.

Date: November 5, 2025

MORRISON & FOERSTER LLP

/s/ Jordan Eth

JORDAN ETH (CA SBN 121617)
JEth@mofo.com
WILLIAM FRENTZEN (CA SBN 343918)
WFrentzen@mofo.com
DAVID J. WIENER (CA SBN 291659)
DWiener@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

WILLIAM SAVITT (admitted *pro hac vice*)
WDSavitt@wlrk.com
BRADLEY R. WILSON (admitted *pro hac vice*)
BRWilson@wlrk.com
SARAH K. EDDY (admitted *pro hac vice*)
SKEddy@wlrk.com
STEVEN WINTER (admitted *pro hac vice*)
SWinter@wlrk.com
NATHANIEL CULLERTON (admitted *pro hac vice*)
NDCullerton@wlrk.com
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, NY 10019
Telephone: (212) 403-1000
Facsimile: (212) 403-2000

Attorneys for the OpenAI Defendants