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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

TEMPORARY SEALING MOTION RE: PLAINTIFF'S OPPOSITION TO OPENAI DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Local Rule 79-5(e) and Paragraph 12 of this Court's Standing Order in Civil Cases ("Standing Order"), Plaintiff Elon Musk submits this Temporary Sealing Motion requesting to file under seal portions of Plaintiff's Memorandum of Points and Authorities in Opposition to OpenAI Defendants' Motion for Summary Judgment ("Opposition"), Responsive Statement of Undisputed Material Facts in Support of Plaintiff's Opposition, and certain Exhibits to the Declaration of Walter H Hawes IV, as detailed in the chart below.

Dkt. No.	Document Description	Status	Party Claiming Confidentiality
351-1	Plaintiff's Opposition	Provisionally Under Seal	All Parties
351-2	Plaintiff's Responsive Statement of Undisputed Material Facts	Provisionally Under Seal	All Parties
351-3	Declaration of Walter H Hawes IV ("Hawes Declaration") in Support of Plaintiff's Opposition	Not Under Seal	N/A
351-4	Exhibit 1 to Hawes Declaration	Provisionally Under Seal	Elon Musk
351-5	Exhibit 2 to Hawes Declaration	Not Under Seal	N/A
351-6	Exhibit 3 to Hawes Declaration	Not Under Seal	N/A
351-7	Exhibit 4 to Hawes Declaration	Not Under Seal	N/A
351-8	Exhibit 5 to Hawes Declaration	Not Under Seal	N/A
351-9	Exhibit 6 to Hawes Declaration	Provisionally Under Seal	Elon Musk
351-10	Exhibit 7 to Hawes Declaration	Not Under Seal	N/A
351-11	Exhibit 8 to Hawes Declaration	Not Under Seal	N/A
351-12	Exhibit 9 to Hawes Declaration	Not Under Seal	N/A
351-13	Exhibit 10 to Hawes Declaration	Provisionally Under Seal	All Parties
351-14	Exhibit 11 to Hawes Declaration	Provisionally Under Seal	Elon Musk
351-15	Exhibit 12 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-16	Exhibit 13 to Hawes Declaration	Not Under Seal	N/A
351-17	Exhibit 14 to Hawes Declaration	Provisionally Under Seal	Elon Musk
351-18	Exhibit 15 to Hawes Declaration	Provisionally Under Seal	Third Party SpaceX
351-19	Exhibit 16 to Hawes Declaration	Not Under Seal	N/A

351-20	Exhibit 17 to Hawes Declaration	Provisionally Under Seal	Third Party BMO Financial Group
351-21	Exhibit 18 to Hawes Declaration	Provisionally Under Seal	Elon Musk
351-22	Exhibit 19 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-23	Exhibit 20 to Hawes Declaration	Provisionally Under Seal	Elon Musk
351-24	Exhibit 21 to Hawes Declaration	Provisionally Under Seal	Third Party BMO Financial Group
351-25	Exhibit 22 to Hawes Declaration	Provisionally Under Seal	Third Party BMO Financial Group
351-26	Exhibit 23 to Hawes Declaration	Not Under Seal	N/A
351-27	Exhibit 24 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-28	Exhibit 25 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants; Third Party Ilya Sutskever
351-29	Exhibit 26 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-30	Exhibit 27 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants; Third Party Ermira Murati
351-31	Exhibit 28 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-32	Exhibit 29 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-33	Exhibit 30 to Hawes Declaration	Not Under Seal	N/A
351-34	Exhibit 31 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-35	Exhibit 32 to Hawes Declaration	Provisionally Under Seal	Microsoft Corp.; OpenAI Defendants
351-36	Exhibit 33 to Hawes Declaration	Not Under Seal	N/A
351-37	Exhibit 34 to Hawes Declaration	Provisionally Under Seal	Elon Musk
351-38	Exhibit 35 to Hawes Declaration	Not Under Seal	N/A
351-39	Exhibit 36 to Hawes Declaration	Provisionally Under Seal	Elon Musk; OpenAI Defendants
351-40	Exhibit 37 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-41	Exhibit 38 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-42	Exhibit 39 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants

351-43	Exhibit 40 to Hawes Declaration	Not Under Seal	N/A
351-44	Exhibit 41 to Hawes Declaration	Not Under Seal	N/A
351-45	Exhibit 42 to Hawes Declaration	Not Under Seal	N/A
351-46	Exhibit 43 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-47	Exhibit 44 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-48	Exhibit 45 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-49	Exhibit 46 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-50	Exhibit 47 to Hawes Declaration	Not Under Seal	N/A
351-51	Exhibit 48 to Hawes Declaration	Provisionally Under Seal	Microsoft Corp.
351-52	Exhibit 49 to Hawes Declaration	Not Under Seal	N/A
351-53	Exhibit 50 to Hawes Declaration	Not Under Seal	N/A
351-54	Exhibit 51 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-55	Exhibit 52 to Hawes Declaration	Not Under Seal	N/A
351-56	Exhibit 53 to Hawes Declaration	Provisionally Under Seal	All Parties
351-57	Exhibit 54 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-58	Exhibit 55 to Hawes Declaration	Provisionally Under Seal	Microsoft Corp.; OpenAI Defendants
351-59	Exhibit 56 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-60	Exhibit 57 to Hawes Declaration	Provisionally Under Seal	All Parties; Third Party Helen Toner
351-61	Exhibit 58 to Hawes Declaration	Provisionally Under Seal	All Parties; Third Party Tasha McCauley
351-62	Exhibit 59 to Hawes Declaration	Not Under Seal	N/A
351-63	Exhibit 60 to Hawes Declaration	Provisionally Under Seal	Microsoft Corp.; OpenAI Defendants
351-64	Exhibit 61 to Hawes Declaration	Provisionally Under Seal	Microsoft Corp.; OpenAI Defendants
351-65	Exhibit 62 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-66	Exhibit 63 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants; Third Party SpaceX

351-67	Exhibit 64 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-68	Exhibit 65 to Hawes Declaration	Provisionally Under Seal	Microsoft Corp.; OpenAI Defendants
351-69	Exhibit 66 to Hawes Declaration	Not Under Seal	N/A
351-70	Exhibit 67 to Hawes Declaration	Not Under Seal	N/A
351-71	Exhibit 68 to Hawes Declaration	Provisionally Under Seal	OpenAI Defendants
351-72	Exhibit 69 to Hawes Declaration	Provisionally Under Seal	Third Party BMO Financial Group
351-73	Exhibit 70 to Hawes Declaration	Provisionally Under Seal	Third Party BMO Financial Group
351-74	Exhibit 71 to Hawes Declaration	Provisionally Under Seal	Third Party BMO Financial Group
351-75	Exhibit 72 to Hawes Declaration	Not Under Seal	N/A

In accordance with Paragraph 12(b)(i)(1) of the Court's Standing Order, the reasons for sealing will be addressed in a forthcoming omnibus sealing stipulation or motion to be filed after the conclusion of briefing on the OpenAI Defendants' Motion for Summary Judgment (Dkt. 327).

Dated: November 7, 2025

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By: */s/ Steven F. Molo*
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