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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 MICROSOFT'S 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 Microsoft's Motion for Summary Judgment ("Opposition"), Responsive Statement of Undisputed Material Facts in Support of Plaintiff's Opposition, and certain Exhibits to the Declaration of Alexandra E. Eynon, as detailed in the chart below.

Dkt. No.	Document Description	Status	Party Claiming Confidentiality
353-1	Plaintiff's Opposition	Provisionally Under Seal	All Parties
353-2	Plaintiff's Responsive Statement of Undisputed Material Facts	Provisionally Under Seal	All Parties
353-3	Plaintiff's Responsive Statement of Undisputed Material Facts	Redacted	All Parties
353-4	Declaration of Alexandra E. Eynon ("Eynon Declaration") in Support of Plaintiff's Opposition	Not Under Seal	N/A
353-5	Exhibit 1 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-6	Exhibit 2 to Eynon Declaration	Not Under Seal	N/A
353-7	Exhibit 3 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Third Party Ilya Sutskever
353-8	Exhibit 4 to Eynon Declaration	Provisionally Under Seal	Elon Musk
353-9	Exhibit 5 to Eynon Declaration	Not Under Seal	N/A
353-10	Exhibit 6 to Eynon Declaration	Not Under Seal	N/A
353-11	Exhibit 7 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-12	Exhibit 8 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-13	Exhibit 9 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-14	Exhibit 10 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-15	Exhibit 11 to Eynon Declaration	Not Under Seal	N/A
353-16	Exhibit 12 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-17	Exhibit 13 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-18	Exhibit 14 to Eynon Declaration	Not Under Seal	N/A
353-19	Exhibit 15 to Eynon Declaration	Not Under Seal	N/A
353-20	Exhibit 16 to Eynon Declaration	Not Under Seal	N/A
353-21	Exhibit 17 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants

353-22	Exhibit 18 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Reid Hoffman
353-23	Exhibit 19 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-24	Exhibit 20 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-25	Exhibit 21 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Third Party Ermira Murati
353-26	Exhibit 22 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-27	Exhibit 23 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-28	Exhibit 24 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-29	Exhibit 25 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-30	Exhibit 26 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-31	Exhibit 27 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-32	Exhibit 28 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-33	Exhibit 29 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-34	Exhibit 30 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-35	Exhibit 31 to Eynon Declaration	Not Under Seal	N/A
353-36	Exhibit 32 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-37	Exhibit 33 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-38	Exhibit 34 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-39	Exhibit 35 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-40	Exhibit 36 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-41	Exhibit 37 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-42	Exhibit 38 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Microsoft
353-43	Exhibit 39 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Microsoft
353-44	Exhibit 40 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Microsoft
353-45	Exhibit 41 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-46	Exhibit 42 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-47	Exhibit 43 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI

			Defendants
353-48	Exhibit 44 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-49	Exhibit 45 to Eynon Declaration	Not Under Seal	N/A
353-50	Exhibit 46 to Eynon Declaration	Provisionally Under Seal	All Parties; Third Party Helen Toner
353-51	Exhibit 47 to Eynon Declaration	Provisionally Under Seal	All Parties; Third Party Tasha McCauley
353-52	Exhibit 48 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-53	Exhibit 49 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-54	Exhibit 50 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-55	Exhibit 51 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Microsoft
353-56	Exhibit 52 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-57	Exhibit 53 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-58	Exhibit 54 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-59	Exhibit 55 to Eynon Declaration	Not Under Seal	N/A
353-60	Exhibit 56 to Eynon Declaration	Intentionally Left Blank	N/A
353-61	Exhibit 57 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants
353-62	Exhibit 58 to Eynon Declaration	Not Under Seal	N/A
353-63	Exhibit 59 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-64	Exhibit 60 to Eynon Declaration	Not Under Seal	N/A
353-65	Exhibit 61 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants
353-66	Exhibit 62 to Eynon Declaration	Not Under Seal	N/A
353-67	Exhibit 63 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-68	Exhibit 64 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-69	Exhibit 65 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-70	Exhibit 66 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-71	Exhibit 67 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants
353-72	Exhibit 68 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants

353-73	Exhibit 69 to Eynon Declaration	Not Under Seal	N/A
353-74	Exhibit 70 to Eynon Declaration	Not Under Seal	N/A
353-75	Exhibit 71 to Eynon Declaration	Provisionally Under Seal	Microsoft
353-76	Exhibit 72 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-77	Exhibit 73 to Eynon Declaration	Provisionally Under Seal	Microsoft; OpenAI Defendants
353-78	Exhibit 74 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants
353-79	Exhibit 75 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants
353-80	Exhibit 76 to Eynon Declaration	Provisionally Under Seal	OpenAI Defendants; Third Party Reid Hoffman
353-81	Exhibit 77 to Eynon Declaration	Provisionally Under Seal	Microsoft

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 Microsoft's Motion for Summary Judgment (Dkt. 329).

Dated: November 7, 2025

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By: */s/ Steven F. Molo*
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