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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

**PLAINTIFF ELON MUSK'S UNOPPOSED ADMINISTRATIVE MOTION FOR LEAVE TO FILE CORRECTED EXHIBIT**

**Action Filed: August 5, 2024**

Pursuant to Civil Local Rule 7-11, Plaintiff Elon Musk ("Plaintiff") respectfully submits this unopposed administrative motion for leave to file a corrected version of Exhibit 57 to Plaintiff's Opposition to the OpenAI Defendants' Motion for Summary Judgment. Plaintiff respectfully requests that the corrected version of Exhibit 57, filed under seal contemporaneously with this Motion, replace the existing version that was previously filed at Dkt. 351-60.

The previously filed version of Exhibit 57 inadvertently included extraneous excerpts that were not cited in Plaintiff's opposition memorandum and were not intended to be included in the exhibit, but which include certain third-party confidential information. Plaintiff seeks to replace the previously filed version of Exhibit 57 with a corrected version that omits those extraneous pages.

Like the previously filed version of Exhibit 57, the corrected version is being filed provisionally under seal. 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. Plaintiff respectfully requests that the Court provisionally maintain the corrected version of Exhibit 57 under seal pending its ruling on that omnibus sealing stipulation or motion.

For the foregoing reasons, Plaintiff respectfully requests the Court grant this Motion. The OpenAI Defendants have advised that they do not oppose this Motion or the relief sought herein.

Dated: November 19, 2025

MOLOLAMKEN LLP

By: */s/ Robert K. Kry*
Robert K. Kry (*pro hac vice*)

**DECLARATION**

Robert K. Kry declares as follows:

1. I am a member of the bar of Washington, D.C. and am admitted to practice *pro hac vice* before this Court. I submit this declaration pursuant to Civil Local Rule 7-11(a).

2. On November 11, 2025, I contacted the OpenAI Defendants' counsel to request a stipulation concerning the relief sought by this motion. On November 17, 2025, the OpenAI Defendants' counsel advised that they did not believe that a stipulation was appropriate but that they would not oppose a motion seeking the relief sought.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 19, 2025

Washington, D.C.

*/s/ Robert K. Kry*
Robert K. Kry

**[PROPOSED] ORDER**

Upon consideration of Plaintiff Elon Musk's Unopposed Administrative Motion for Leave to File Corrected Exhibit, and good cause appearing therefrom, it is hereby ordered that the Motion is **GRANTED**.

The Clerk is directed to replace the previously filed version of Exhibit 57 to Plaintiff's Opposition to the OpenAI Defendants' Motion for Summary Judgment filed at Dkt. 351-60 with the corrected version filed contemporaneously with the Motion. The exhibit shall be provisionally maintained under seal pending the Court's ruling on the omnibus sealing submission relating to the summary judgment filings.

**IT IS SO ORDERED.**

DATED: _____

_____
Hon. Yvonne Gonzalez Rogers
United States District Judge