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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: OPENAI DEFENDANTS' REPLY IN SUPPORT OF 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"), the OpenAI Defendants submit this Temporary Sealing Motion requesting to file under seal portions of the OpenAI Defendants' Reply in Support of Motion for Summary Judgment (ECF No. 359), Reply Statement of Undisputed Material Facts in Support of Motion for Summary Judgment, and certain Exhibits to the Declaration of David J. Wiener, as detailed in the chart below.

Dkt. No.	Document	Sealing Status	Party Claiming Confidentiality
360-1	OpenAI Defendants' Reply in Support of Motion for Summary Judgment	Provisionally Under Seal	
360-2	OpenAI Defendants' Reply in Support of Motion for Summary Judgment	Redacted	
360-3	OpenAI Defendants' Reply Statement of Undisputed Material Facts in Support of Motion for Summary Judgment	Provisionally Under Seal	
360-4	Declaration of David J. Wiener in Support of the OpenAI Defendants' Reply in Support of Motion for Summary Judgment	Not Under Seal	N/A
360-5	Ex. 83 to the Wiener Decl. – California Attorney General Rob Bonta's Statement on OpenAI's Recapitalization Plan, dated October 28, 2025	Not Under Seal	N/A
360-6	Ex. 84 to the Wiener Decl. – Memorandum of Understanding entered into by California Attorney General Rob Bonta and OpenAI, Inc., dated October 27, 2025	Not Under Seal	N/A
360-7	Ex. 85 to the Wiener Decl. – Delaware Department of Justice press release, dated October 28, 2025	Not Under Seal	N/A
360-8	Ex. 86 to the Wiener Decl. – Letter from the Delaware Department of Justice to OpenAI, Inc., dated October 28, 2025	Not Under Seal	N/A

In accordance with Paragraph 12(b)(i)(1) of the 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.

Date: November 21, 2025

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