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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

JOINT STIPULATION TO EXTEND TIME TO FILE OMNIBUS SEALING STIPULATION AND MOTIONS

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Attorneys for Defendant Microsoft Corporation

Pursuant to Section (c) of the Post-Briefing Omnibus Sealing Procedures in this Court's Standing Order in Civil Cases, Plaintiff Elon Musk; 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 (collectively, the "OpenAI Defendants"); and Defendant Microsoft Corporation (together with the OpenAI Defendants, "Defendants," and collectively with Plaintiff and the OpenAI Defendants, the "Parties"), hereby stipulate to extend the deadlines for the Parties to file the Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes related to the briefing for Defendants' Motions for Summary Judgment (Dkts. 327 & 329) (the "Motions") as follows:

WHEREAS, Defendants filed the Motions on October 17, 2025 with a hearing date of January 7, 2026 (Dkts. 327 & 329);

WHEREAS, Plaintiff opposed the Motions on November 7, 2025 (Dkts. 350 & 352);

WHEREAS, Defendants filed replies in further support of the Motions on November 21, 2025 (Dkts. 357 & 359), resulting in a deadline of December 5, 2025 for the Parties to file the Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes, pursuant to Section (a) of the Post-Briefing Omnibus Sealing Procedures in this Court's Standing Order in Civil Cases;

WHEREAS, the Parties previously agreed to extend this deadline by five (5) calendar days to account for the recent holiday and to make corresponding adjustments to the briefing schedule that would govern any Omnibus Motions on Sealing Disputes;

WHEREAS, the Parties subsequently agreed to extend this deadline by another one (1) calendar day to facilitate further discussions over sealing requests and preparation of the Omnibus Sealing Stipulation;

WHEREAS, the Parties have been meeting and conferring in good faith and have agreed to

extend this deadline by an additional calendar day to try to resolve or further narrow the disputes before the Court;

NOW, THEREFORE, pursuant to Section (c) of the Post-Briefing Omnibus Sealing Procedures in this Court's Standing Order in Civil Cases, the Parties stipulate as follows:

1. The Parties shall have until December 12, 2025, to file their Omnibus Sealing Stipulation and any Omnibus Motions on Sealing Disputes;
2. The Parties shall have until December 18, 2025, to file any Oppositions to any Omnibus Sealing Motions; and
3. The Parties shall have until December 23, 2025, to file any Replies in further support of any Omnibus Sealing Motions.

Dated: December 11, 2025

MOLOLAMKEN LLP

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

Attorneys for Plaintiffs Elon Musk and X.AI Corp.

Dated: December 11, 2025

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By: */s/ David J. Wiener*
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Attorneys for the OpenAI Defendants

Dated: December 11, 2025

DECHERT LLP

By: */s/ Russell P. Cohen*
Russell P. Cohen (SBN 213105)

Attorneys for Defendant Microsoft Corporation

SIGNATURE ATTESTATION

I hereby attest that the signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: December 11, 2025

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