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(Additional counsel listed on the next page)

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

OMNIBUS SEALING STIPULATION ON UNDISPUTED SEALING REQUESTS

Judge: Hon. Yvonne Gonzalez Rogers

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Pursuant to Civil Local Rules 7-11 and 79-5, and Section 12 of this Court's Standing Order regarding Post-Briefing Omnibus Sealing Procedures, Plaintiff Elon Musk ("Plaintiff"), 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 ("Microsoft," and together with Plaintiff and the OpenAI Defendants, the "Parties") submit this Omnibus Sealing Stipulation in connection with the following filings:

1. The OpenAI Defendants' Motion for Summary Judgment and supporting papers (filed under seal at Dkt. No. 328);
2. Plaintiff's Opposition to the OpenAI Defendants' Motion for Summary Judgment and supporting papers (filed under seal at Dkt. No. 351);
3. The OpenAI Defendants' Reply in Support of Motion for Summary Judgment and supporting papers (filed under seal at Dkt. No. 360);
4. Microsoft's Motion for Summary Judgment and supporting papers (filed under seal at Dkt. No. 330);
5. Plaintiff's Opposition to Microsoft's Motion for Summary Judgment and supporting papers (filed under seal at Dkt. No. 353); and
6. Microsoft's Reply in Support of Motion for Summary Judgment and supporting papers (filed under seal at Dkt. No. 358).

IV. Sealing Requests

All of the documents referenced in the table below are attachments to temporary sealing motions filed by the Parties at Dkt. Nos. 328 (OpenAI Defendants), 330 (Microsoft), 351 (Plaintiff), 353 (Plaintiff), 358 (Microsoft), and 360 (OpenAI Defendants).

UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR WITH REDACTIONS				
Dkt. No. (Bates Identifier)	**Sealing Party[1]**	**Portion to be Sealed**	**Description**	**Sealing Basis[2]**
Dkt. 328-18 (YCORG_00 00036)	YC Org.	Redactions as indicated in the attached version	Ex. 14 to Wiener Declaration	The redacted portions of Exhibit 14 contain a nonpublic portion of YC Org.'s annual tax filing, and disclose confidential information concerning YC Org.'s donors other than Mr. Musk.
Dkt. 328-37 (BMO_0000 0788)	BMO	Redactions as indicated in the attached version	Ex. 33 to Wiener Declaration	Exhibit 33 contains confidential, personally identifiable information, including email addresses.
Dkt. 328-42 (BMO_0000 0798)	BMO	Redactions as indicated in the attached version	Ex. 38 to Wiener Declaration	Exhibit 38 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 328-43 (BMO_0000 1860)	BMO	Redactions as indicated in the attached version	Ex. 39 to Wiener Declaration	Exhibit 39 contains confidential, personally identifiable information, including email addresses, phone numbers, and tax identification numbers.
Dkt. 328-59 (BMO_0000 0102)	BMO	Redactions as indicated in the attached version	Ex. 55 to Wiener Declaration	Exhibit 55 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 328-74 (BMO_0000 0089)	BMO	Redactions as indicated in the attached version	Ex. 70 to Wiener Declaration	Exhibit 70 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 328-78 (BMO_0000 0120)	BMO	Redactions as indicated in the attached version	Ex. 74 to Wiener Declaration	Exhibit 74 contains confidential, personally identifiable information, including email addresses, phone numbers, and bank account numbers.

[1] "Sealing Party" refers to the party or third-party that is seeking to seal the identified material, not the party that originally filed the information under seal.

[2] In each case, the relevant Sealing Party has identified the "sealing basis" for the documents (or portions thereof) that are listed in this column.

Dkt. 328-67 (TESLA_000 003501)	Tesla	Redactions as indicated in the attached version	Ex. 63 to Wiener Declaration	Non-Party Tesla, Inc. ("Tesla") respectfully submits that the information redacted in Exhibit 63 should remain under seal because it reflects confidential and sensitive information regarding Tesla and other non-parties, which is completely irrelevant to OpenAI or the subject matter of the litigation. Such information should not be made public. All of the information cited in OpenAI Defendants' motion from Exhibit 63 is unredacted.
Dkt. 328-69 (TESLA_000 003416)	Tesla	Redactions as indicated in the attached version	Ex. 65 to Wiener Declaration	Non-Party Tesla respectfully submits that the information redacted in Exhibit 65 should remain under seal because it reflects confidential and sensitive information regarding Tesla and other non-parties, which is completely irrelevant to OpenAI or the subject matter of the litigation. Such information should not be made public. All of the information cited in OpenAI Defendants' motion from Exhibit 65 is unredacted.
Dkt. 328-64 (2024MUSK -0005604)	SpaceX	Redactions as indicated in the attached version	Ex. 60 to Wiener Declaration	Exhibit 60 contains confidential, personally identifiable information, including email addresses of SpaceX employees.
Dkt. 328-65 (SPX-001642)	SpaceX	Redactions as indicated in the attached version	Ex. 61 to Wiener Declaration	Exhibit 61 contains confidential, personally identifiable information, including email addresses of SpaceX employees.
Dkt. 328-66 (SPX-006742)	SpaceX	Redactions as indicated in the attached version	Ex. 62 to Wiener Declaration	Exhibit 62 contains confidential, personally identifiable information, including email addresses of SpaceX employees.
Dkt. 328-70 (SPX-001038)	SpaceX	Redactions as indicated in the attached version	Ex. 66 to Wiener Declaration	Exhibit 66 contains confidential, personally identifiable information, including email addresses of SpaceX employees.
Dkt. 328-83 (2024MUSK -0006098)	SpaceX	Redactions as indicated in the attached version	Ex. 79 to Wiener Declaration	Exhibit 79 contains confidential, personally identifiable information, including email addresses of SpaceX employees.

Dkt. 353-72 (Brockman Deposition Tr.)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 68 to Eynon Declaration	The redacted portion of Exhibit 68 is private information regarding the personal financial holdings of a senior OpenAI executive. Disclosure would substantially invade the executive's personal privacy. The redactions applied are targeted.[3]
Dkt. 328-45 (OPENAI_MUSK000053 65)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 41 to Wiener Declaration	The redacted portions of Exhibit 41 contain a nonpublic portion of OpenAI's annual tax filing, and disclose the address of an OpenAI donor.
Dkt. 328-46 (OPENAI_MUSK000060 40)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 42 to Wiener Declaration	The redacted portions of Exhibit 42 contain a nonpublic portion of OpenAI's annual tax filing, and disclose the address of an OpenAI donor.
Dkt. 328-47 (OPENAI_MUSK000054 12)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 43 to Wiener Declaration	The redacted portions of Exhibit 43 contain a nonpublic portion of OpenAI's annual tax filing, and disclose the addresses of OpenAI donors.
Dkt. 328-60 (OPENAI_MUSK000033 71)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 56 to Wiener Declaration	The redacted portion of Exhibit 56 contains confidential, personally identifiable information in the form of a telephone number.
Dkt. 328-80 (2024MUSK -0004742)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 76 to Wiener Declaration	The redacted portions of Exhibit 76 contain confidential, personally identifiable information in the form of personal email addresses.
Dkt. 328-84 (2024MUSK -0009870)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 80 to Wiener Declaration	The redacted portions of Exhibit 80 contain confidential, personally identifiable information in the form of personal email addresses.
Dkt. 328-86 (OPENAI_MUSK000280 00)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 82 to Wiener Declaration	The redacted portions of Exhibit 80 contain confidential, personally identifiable information in the form of an address and four vehicle identification numbers.

[3] The OpenAI Defendants previously sought to seal substantially similar information. Dkt. 333. That request was granted. Dkt. 336.

Dkt. 351-15 (compilation exhibit)	OpenAI Defendants	Redactions as indicated in the attached version	Ex. 12 to Hawes Declaration	The redacted portions of Exhibit 12 contain a nonpublic portions of OpenAI's annual tax filings, and disclose the addresses of OpenAI donors.
Dkt. 328-16 (Musk Deposition Tr.)	Elon Musk	Redactions as indicated in the attached version	Ex. 12 to Wiener Declaration	The redacted portions of Exhibit 12 contain confidential content that would invade Musk's privacy interests and disclose sensitive third-party information and which is not relevant to summary judgment, as further described in the Kry Declaration.
Dkt. 328-20 (VC000411)	Elon Musk; Jared Birchall	Redactions as indicated in the attached version	Ex. 16 to Wiener Declaration	The redacted portions of Exhibit 16 contain confidential, personally identifiable information in the form of birth dates, a home telephone number, a street address, and third-party contact information.
Dkt. 328-25 (FIDCHAR-OPENAI-000751)	Elon Musk; Jared Birchall	Redactions as indicated in the attached version	Ex. 21 to Wiener Declaration	The redacted portions of Exhibit 21 contain confidential, personally identifiable information in the form of partial social security numbers, a partial personal telephone number, and a mailing address.
Dkt. 328-26 (FIDCHAR-OPENAI-000876)	Elon Musk; Jared Birchall	Redactions as indicated in the attached version	Ex. 22 to Wiener Declaration	The redacted portions of Exhibit 22 contain confidential, personally identifiable information in the form of a partial social security number, partial personal telephone numbers, and full financial account numbers.
Dkt. 328-41 (Catalyst 0000014)	Elon Musk	Redactions as indicated in the attached version	Ex. 37 to Wiener Declaration	The redacted portions of Exhibit 37 contain confidential financial information from Musk's tax return.
Dkt. 330-70 (Zilis Deposition Tr.)	Shivon Zilis	Redactions as indicated in the attached version	Ex. 37 to Cohen Declaration	The redacted portions of Exhibit 37 contain confidential personal information of a third party that is not relevant to the case.

Dkt. 351-4 (Musk Deposition Tr.)	Elon Musk	Redactions as indicated in the attached version	Ex. 1 to Hawes Declaration	The redacted portions of Exhibit 1 contain confidential content that would invade Musk's privacy interests and disclose sensitive third-party information and which is not relevant to summary judgment, as further described in the Kry Declaration.
Dkt. 351-21 (2024MUSK-0009615)	Jared Birchall	Redactions as indicated in the attached version	Ex. 18 to Hawes Declaration	The redacted portions of Exhibit 18 contain confidential, personally identifiable information in the form of personal telephone numbers.
Dkt. 351-23 (EXMF-0003982)	Jared Birchall	Redactions as indicated in the attached version	Ex. 20 to Hawes Declaration	The redacted portions of Exhibit 20 contain confidential, personally identifiable information in the form of a personal telephone number and third-party contact information.
Dkt. 351-42 (OPENAI_MUSK000174 50)	Elon Musk	Redactions as indicated in the attached version	Ex. 39 to Hawes Declaration	The redacted portions of Exhibit 39 contain confidential, sensitive commercial information about one of Musk's other businesses.
Dkt. 353-8 (Musk Deposition Tr.)	Elon Musk	Redactions as indicated in the attached version	Ex. 4 to Eynon Declaration	The redacted portions of Exhibit 4 contain confidential content that would invade Musk's privacy interests and disclose sensitive third-party information and which is not relevant to summary judgment, as further described in the Kry Declaration.
Dkt. 351-66 (SPX-001642)	SpaceX	Redactions as indicated in the attached version	Ex. 63 to Hawes Declaration	Exhibit 63 contains confidential, personally identifiable information, including email addresses of SpaceX personnel.
Dkt. 351-20 (BMO_00000120)	BMO	Redactions as indicated in the attached version	Ex. 17 to Hawes Declaration	Exhibit 17 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 351-24 (BMO_00000529)	BMO	Redactions as indicated in the attached version	Ex. 21 to Hawes Declaration	Exhibit 21 contains confidential, personally identifiable information, including email addresses and phone numbers.

Dkt. 351-25 (BMO_0000 0369)	BMO	Redactions as indicated in the attached version	Ex. 22 to Hawes Declaration	Exhibit 22 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 351-72 (BMO_0000 0153)	BMO	Redactions as indicated in the attached version	Ex. 69 to Hawes Declaration	Exhibit 69 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 351-73 (BMO_0000 0238)	BMO	Redactions as indicated in the attached version	Ex. 70 to Hawes Declaration	Exhibit 70 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 351-74 (BMO_0000 0192)	BMO	Redactions as indicated in the attached version	Ex. 71 to Hawes Declaration	Exhibit 71 contains confidential, personally identifiable information, including email addresses and phone numbers.
Dkt. 351-28 (Sutskever Deposition Tr.)	Ilya Sutskever	Redactions as indicated in the attached version	Ex. 25 to Hawes Declaration	This testimony contains confidential non-OpenAI employment compensation information. Mr. Sutskever maintains that the information is constitutionally-protected private financial information, the disclosure of which would harm Mr. Sutskever's future employment negotiations and enable third parties to misuse the details of his financial circumstances, and that compelling reasons therefore exist to seal this narrowly tailored material.
Dkt. 353-25 (Murati Deposition Tr.)	Mira Murati	Redactions as indicated in the attached version	Ex. 21 to Eynon Declaration	The redacted portions of Exhibit 21 contain material addressing confidential personnel matters that is not cited in the summary judgments briefs.
Dkt. 330-14 (Plaintiff Musk's Supp. R&Os to Microsoft's Interrogatories)	Microsoft	Redactions as indicated in the attached version	Ex. 6 to Cohen Declaration	The redacted portions of Exhibit 6 contain competitively sensitive information ("CSI") that is not relied upon in any party's briefing, including non-public financial terms and revenue figures that could be used to undercut Microsoft's pricing.

Dkt. 330-16 (2024MUSK-0000669)	Microsoft	Redactions as indicated in the attached version	Ex. 7 to Cohen Declaration	The redacted portions of Exhibit 7 contain confidential, personally identifiable information, including email addresses.
Dkt. 330-18 (MSFT_MUSK00005533 6)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 8 to Cohen Declaration	The redacted portions of Exhibit 8 contain CSI that is not relied upon in any party's briefing, including non-public financial terms and other strategic business terms, including the specific pricing structure of Microsoft's Azure services to OpenAI.
Dkt. 330-45 (Excerpts from the deposition transcript of Microsoft 30(b)(6) deponent Michael Wetter, taken September 8, 2025 and September 25, 2025)	Microsoft	Redactions as indicated in the attached version	Ex. 24 to Cohen Declaration	The redacted portions of Exhibit 24 contain CSI that is not relied upon in any party's briefing, including non-public financial terms relating to funding structure and other strategic business terms.
Dkt. 330-49 (MSFT_MUSK00005516 9)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 26 to Cohen Declaration	The redacted portions of Exhibit 26 contain CSI including OpenAI's spending commitment on Azure services and the pricing formula for dedicated hardware; and additional CSI that is not relied upon in any party's briefing, including proprietary technical information, non-public financial terms, and other strategic business terms.
Dkt. 330-51 (OPENAI_MUSK000119 08)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 27 to Cohen Declaration	The redacted portions of Exhibit 27 contain CSI that is not relied upon in any party's briefing, including non-public financial terms and other strategic business terms.

Dkt. 330-56 (MSFT_MUSK00005589 5)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 30 to Cohen Declaration	The redacted portions of Exhibit 30 contain CSI that is not relied upon in any party's briefing, including non-public information regarding internal decision-making.
Dkt. 330-58 (MSFT_MUSK00006450 9)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 31 to Cohen Declaration	The redacted portions of Exhibit 31 contain CSI regarding non-public terms of the JDCA's funding structure; and additional CSI that is not relied upon in any party's briefing, including non-public financial terms, spending commitments, and other strategic business terms.
Dkt. 330-60 (OPENAI_MUSK000302 25)	Microsoft	Redactions as indicated in the attached version	Ex. 32 to Cohen Declaration	The redacted portions of Exhibit 32 contain confidential, personally identifiable information, including email addresses.
Dkt. 330-62 (MSFT_MUSK00005593 7)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 33 to Cohen Declaration	The redacted portions of Exhibit 33 contain CSI that is not relied upon in any party's briefing, including non-public financial terms and other strategic business terms.
Dkt. 330-66 (MSFT_MUSK00005509 9)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 35 to Cohen Declaration	The redacted portions of Exhibit 35 contain CSI regarding commercialization lead time and additional CSI that is not relied upon in any party's briefing, including proprietary technical information, non-public financial terms, and other strategic business terms.
Dkt. 351-51 (MSFT_MUSK00004418 3)	Microsoft	Redactions as indicated in the attached version	Ex. 48 to Hawes Declaration	The redacted portions of Exhibit 48 contain confidential, personally identifiable information, including email addresses.

Dkt. 351-56 (Schizer report)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 53 to Hawes Declaration	The redacted portions of Exhibit 53 contain CSI that is not relied upon in any party's briefing, including proprietary technical information, financial terms, other strategic business terms, and internal decision-making.
Dkt. 351-58 (MSFT_MUSK000000387)	Microsoft	Redactions as indicated in the attached version	Ex. 55 to Hawes Declaration	The redacted portions of Exhibit 55 contain CSI that is not relied upon in any party's briefing regarding the terms of Microsoft's investment in OpenAI; and email addresses.
Dkt. 351-64 (MSFT_MUSK000057806)	Microsoft	Redactions as indicated in the attached version	Ex. 61 to Hawes Declaration	The redacted portions of Exhibit 61 contain CSI that is not relied upon in any party's briefing regarding Microsoft's internal decision-making and views on potential board candidates; and phone numbers.
Dkt. 351-68 (OPENAI_MUSK000374 69)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 65 to Hawes Declaration	The redacted portions of Exhibit 65 contain CSI that is not relied upon in any party's briefing, including non-public financial terms and other strategic business terms.
Dkt. 353-05 (MSFT_MUSK000044183)	Microsoft	Redactions as indicated in the attached version	Ex. 1 to Eynon Declaration	The redacted portions of Exhibit 1 contain confidential, personally identifiable information, including email addresses.
Dkt. 353-11 (Excerpts from the deposition transcript of Microsoft 30(b)(6) deponent Michael Wetter, taken September 8, 2025 and September 25, 2025)	Microsoft	Redactions as indicated in the attached version	Ex. 7 to Eynon Declaration	The redacted portions of Exhibit 7 contain CSI that is not relied upon in any party's briefing, including non-public financial terms relating to funding structure and other strategic business terms.

Dkt. 353-12 (MSFT_MUSK00004429 4)	Microsoft	Redactions as indicated in the attached version	Ex. 8 to Eynon Declaration	The redacted portions of Exhibit 8 contain confidential, personally identifiable information, including email addresses.
Dkt. 353-13 (Nadella Tr.)	Microsoft	Redactions as indicated in the attached version	Ex. 9 to Eynon Declaration	The redacted portions of Exhibit 9 contain CSI regarding Microsoft's views on potential board candidates and internal decision-making; and additional CSI that is not relied upon in any party's briefing regarding non-public strategic business terms and internal decision-making.
Dkt. 353-14 (MSFT_MUSK00000159)	Microsoft	Redactions as indicated in the attached version	Ex. 10 to Eynon Declaration	The redacted portions of Exhibit 10 contain CSI that is not relied upon in any party's briefing including proprietary technical information, non-public information regarding internal decision-making, and non-public financial terms and other strategic business terms.
Dkt. 353-16 (2024MUSK-0000669)	Microsoft	Redactions as indicated in the attached version	Ex. 12 to Eynon Declaration	The redacted portions of Exhibit 12 contain confidential, personally identifiable information, including email addresses.
Dkt. 353-17 (MSFT_MUSK00000150)	Microsoft	Redactions as indicated in the attached version	Ex. 13 to Eynon Declaration	The redacted portions of Exhibit 13 contain CSI regarding non-public financial terms and internal decision-making, most of which is not relied upon in either party's briefing; and email addresses.
Dkt. 353-23 (MSFT_MUSK00000146 1)	Microsoft	Redactions as indicated in the attached version	Ex. 19 to Eynon Declaration	The redacted portions of Exhibit 19 contain confidential, personally identifiable information, including email addresses.

Dkt. 353-24 (MSFT_MUSK00000993)	Microsoft	Redactions as indicated in the attached version	Ex. 20 to Eynon Declaration	The redacted portions of Exhibit 20 contain CSI that is not relied upon in either party's briefing, including non-public information regarding internal decision-making; email addresses.
Dkt. 353-26 (MSFT_MUSK00008388 2)	Microsoft	Maintain under seal	Ex. 22 to Eynon Declaration	Exhibit 22 contains CSI including proprietary technical information, non-public financial terms, and non-public information regarding internal decision-making, most of which is not relied upon in either party's briefing.
Dkt. 353-27 (MSFT_MUSK00000673)	Microsoft	Redactions as indicated in the attached version	Ex. 23 to Eynon Declaration	The redacted portions of Exhibit 23 contain CSI including non-public financial terms regarding proposed deal structure; additional CSI that is not relied upon in either party's briefing regarding internal decision-making and third parties; and email addresses.
Dkt. 353-29 (MSFT_MUSK00005995 1)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 25 to Eynon Declaration	The redacted portions of Exhibit 25 contain CSI that is not relied upon in either party's briefing, including non-public financial terms and other strategic business terms.
Dkt. 353-30 (MSFT_MUSK00000108 3)	Microsoft	Redactions as indicated in the attached version	Ex. 26 to Eynon Declaration	The redacted portions of Exhibit 26 contain CSI that is not relied upon in either party's briefing regarding the terms of Microsoft's investment in OpenAI; email addresses.
Dkt. 353-31 (MSFT_MUSK00000024 4)	Microsoft	Redactions as indicated in the attached version	Ex. 27 to Eynon Declaration	The redacted portions of Exhibit 27 contain confidential, personally identifiable information, including email addresses.

Dkt. 353-32 (MSFT_MUSK00005516 9)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 28 to Eynon Declaration	The redacted portions of Exhibit 28 contain CSI including OpenAI's spending commitment on Azure services and the pricing formula for dedicated hardware; and additional CSI that is not relied upon in either party's briefing, including proprietary technical information, non-public financial terms, and other strategic business terms.
Dkt. 353-33 (MSFT_MUSK00008574 9)	Microsoft	Redactions as indicated in the attached version	Ex. 29 to Eynon Declaration	The redacted portions of Exhibit 29 contain confidential, personally identifiable information, including email addresses.
Dkt. 353-34 (MSFT_MUSK00006828 4)	Microsoft	Redactions as indicated in the attached version	Ex. 30 to Eynon Declaration	The redacted portions of Exhibit 30 contain CSI that is not relied upon in either party's briefing, including proprietary technical information, non-public financial terms and other strategic business terms, and non-public negotiations and internal decision-making; email addresses.
Dkt. 353-36 (MSFT_MUSK00005864 8)	Microsoft	Maintain under seal	Ex. 32 to Eynon Declaration	Exhibit 32 contains CSI including proprietary technical information, non-public financial terms and other strategic business terms, and non-public information regarding internal decision-making, most of which is not relied upon in either party's briefing.

Dkt. 353-37 (MSFT_MUSK00005651 7)	Microsoft	Maintain under seal	Ex. 33 to Eynon Declaration	Exhibit 33 contains CSI including proprietary technical information, non-public financial terms and other strategic business terms, and non-public information regarding internal decision-making, most of which is not relied upon in either party's briefing.
Dkt. 353-38 (MSFT_MUSK00006457 3)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 34 to Eynon Declaration	The redacted portions of Exhibit 34 contain CSI that is not relied upon in either party's briefing, including non-public financial terms and other strategic business terms.
Dkt. 353-39 (MSFT_MUSK00006450 9)[4]	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 35 to Eynon Declaration	The redacted portions of Exhibit 35 contain CSI regarding non-public terms of the JDCA's funding structure; and additional CSI that is not relied upon in either party's briefing, including non-public financial terms, spending commitments, and other strategic business terms.
Dkt. 353-40 (MSFT_MUSK00005486 0)	Microsoft	Redactions as indicated in the attached version	Ex. 36 to Eynon Declaration	The redacted portions of Exhibit 36 contain confidential, personally identifiable information, including email addresses

[4] Exhibit 35 to Plaintiff's Opposition to Microsoft's Motion for Summary Judgment (Dkt. 353-39) inadvertently attached the 2021 Second Amended and Restated Limited Partnership Agreement of OpenAI, LP, rather than the 2021 Joint Development and Collaboration Agreement. The correct exhibit can be found at Dkt. 330-58. Plaintiff intends to file a motion for leave to file a corrected exhibit.

Dkt. 353-45 (MSFT_MUSK00000116 8)	Microsoft	Maintain under seal	Ex. 41 to Eynon Declaration	The redacted portions of Exhibit 41 contain CSI including proprietary technical information, non-public financial terms and other strategic business terms, and non-public information regarding internal decision-making, most of which is not relied upon in either party's briefing.
Dkt. 353-46 (MSFT_MUSK00005500 1)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 42 to Eynon Declaration	The redacted portions of Exhibit 42 contain CSI that is not relied upon in either party's briefing, including non-public financial terms and other strategic business terms.
Dkt. 353-47 (MSFT_MUSK00005509 9)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 43 to Eynon Declaration	The redacted portions of Exhibit 43 contain CSI regarding commercialization lead time and additional CSI that is not relied upon in either party's briefing, including proprietary technical information, non-public financial terms, and other strategic business terms.
Dkt. 353-48 (MSFT_MUSK00000000 1)	Microsoft	Redactions as indicated in the attached version	Ex. 44 to Eynon Declaration	The redacted portions of Exhibit 44 contain CSI that is not relied upon in either party's briefing, including non-public information regarding internal decision-making; email addresses.
Dkt. 353-53 (MSFT_MUSK00006708 6)	Microsoft	Redactions as indicated in the attached version	Ex. 49 to Eynon Declaration	The redacted portions of Exhibit 49 contain confidential, personally identifiable information, including phone numbers.
Dkt. 353-54 (MSFT_MUSK00005486 6)	Microsoft	Redactions as indicated in the attached version	Ex. 50 to Eynon Declaration	The redacted portions of Exhibit 50 contain confidential, personally identifiable information, including email addresses.

Dkt. 353-56 (OPENAI_MUSK00027478)	Microsoft	Redactions as indicated in the attached version	Ex. 52 to Eynon Declaration	The redacted portions of Exhibit 52 contain CSI that is not relied upon in either party's briefing regarding Microsoft's internal decision-making and views on potential board candidates; and phone numbers.
Dkt. 353-58 (OPENAI_MUSK00027413)	Microsoft	Redactions as indicated in the attached version	Ex. 54 to Eynon Declaration	The redacted portions of Exhibit 54 contain confidential, personally identifiable information, including phone numbers.
Dkt. 353-67 (MSFT_MUSK00008353 2)	Microsoft	Maintain under seal	Ex. 63 to Eynon Declaration	Exhibit 63 contains CSI including proprietary technical information such as planned supercomputer capacity and cost, non-public financial terms and other strategic business terms, and non-public information regarding internal decision-making, most of which is not relied upon in either party's briefing.
Dkt. 353-68 (MSFT_MUSK00009243 4)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 64 to Eynon Declaration	The redacted portions of Exhibit 64 contain CSI that is not relied upon in either party's briefing, including non-public financial terms and other strategic business terms.
Dkt. 353-69 (MSFT_MUSK00008408 5)	Microsoft	Maintain under seal	Ex. 65 to Eynon Declaration	Exhibit 65 contains CSI including strategic business terms and internal decision-making and negotiations between Microsoft and OpenAI; most of which is not relied upon in either party's briefing.

Dkt. 353-70 (MSFT_MUSK00009241 5)	Microsoft and OpenAI Defendants	Maintain under seal	Ex. 66 to Eynon Declaration	Exhibit 66 contains CSI that is not specifically relied upon in either party's briefing, including proprietary technical information, non-public financial terms including revenue formulas, and other strategic business terms relating to IP licensing and models, and non-public information regarding internal decision-making.
Dkt. 353-76 (MSFT_MUSK00001861 6)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 72 to Eynon Declaration	The redacted portions of Exhibit 72 contain CSI that is not relied upon in either party's briefing, including proprietary technical information, non-public financial terms and other strategic business terms, and non-public information regarding internal decision-making.
Dkt. 353-77 (MSFT_MUSK00000209 8)	Microsoft and OpenAI Defendants	Redactions as indicated in the attached version	Ex. 73 to Eynon Declaration	The redacted portions of Exhibit 73 contain CSI that is not relied upon in either party's briefing, including non-public financial terms and other strategic business terms.
Dkt. 353-80 (HOFFMAN_000000051)	Microsoft, Non-Party Reid Hoffman, OpenAI Defendants	Redactions as indicated in the attached version	Ex. 76 to Eynon Declaration	The redacted portions of Exhibit 76 contain CSI that is not relied upon in either party's briefing, including non-public financial terms relating to funding structure and other strategic business terms.
Dkt. 353-81 (MSFT_MUSK00005687 6)	Microsoft	Maintain under seal	Ex. 77 to Eynon Declaration	Exhibit 77 contains CSI including non-public financial terms and other strategic business terms, and non-public information regarding internal decision-making, most of which is not relied upon in either party's briefing.

For the avoidance of doubt, the parties have agreed to unseal all documents associated with Dkt. Nos. 328 (OpenAI Defendants), 330 (Microsoft), 351 (Plaintiff), 353 (Plaintiff), 358 (Microsoft), and 360 (OpenAI Defendants) that are not listed in the above table.[5]

Pursuant to the Post-Briefing Omnibus Sealing Procedures in Section 12 of the Court's Standing Order in Civil Cases, the Parties are submitting the following additional materials in connection herewith: (i) a Proposed Order On Undisputed Sealing Requests; (ii) the Declarations of Robert K. Kry, Bradley R. Wilson, Ronald Gong, Lindsay Chapman, Jonathan Levy, Ilya Sutskever, Andrew Schulkin (two declarations), Michael Wetter, Kayleigh Klinzman, and Marc H. Axelbaum supporting the requests to seal;[6] and (iii) redacted versions of those exhibits the Parties or relevant third parties seek to refile not under seal with redactions.

[5] Plaintiff requests that the Court act on his Unopposed Administrative Motion for Leave To File Corrected Exhibit (Dkt. 355) before unsealing Exhibit 57 to Plaintiff's Opposition to the OpenAI Defendants' Motion for Summary Judgment filed at Dkt. 351-60.

[6] Tesla has informed the OpenAI Defendants that it is happy to provide further explanation or support if requested by the Court. (*See* Standing Order at 11 n.3.)

IT IS SO STIPULATED.

Date: December 12, 2025

MORRISON & FOERSTER LLP

/s/ Jordan Eth
JORDAN ETH (CA SBN 121617)

Attorneys for the OpenAI Defendants

Date: December 12, 2025

DECHERT LLP

/s/ Russell P. Cohen
RUSSELL P. COHEN (SBN 213105)

Attorneys for Defendant Microsoft Corporation

Date: December 12, 2025

MOLOLAMKEN LLP

Robert K. Kry
ROBERT K. KRY (*pro hac vice*)

Attorneys for Plaintiffs Elon Musk and X.AI Corp.

ECF ATTESTATION

I, Jordan Eth, am the ECF User whose ID and password are being used to file this **OMNIBUS SEALING STIPULATION ON UNDISPUTED SEALING REQUESTS**. In accordance with Civil Local Rule 5-1, concurrence in the filing of this document has been obtained from each of the other signatories, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Date: December 12, 2025

/s/ Jordan Eth
Jordan Eth