JORDAN ETH (CA SBN 121617)
JEth@mofo.com
WILLIAM FRENTZEN (CA SBN 343918)
WFrentzen@mofo.com
DAVID J. WIENER (CA SBN 291659)
DWiener@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

WILLIAM SAVITT (admitted *pro hac vice*)
WDSavitt@wlrk.com
BRADLEY R. WILSON (admitted *pro hac vice*)
BRWilson@wlrk.com
SARAH K. EDDY (admitted *pro hac vice*)
SKEddy@wlrk.com
STEVEN WINTER (admitted *pro hac vice*)
SWinter@wlrk.com
NATHANIEL CULLERTON (admitted *pro hac vice*)
NDCullerton@wlrk.com
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, NY 10019
Telephone: (212) 403-1000
Facsimile: (212) 403-2000

Attorneys for 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

(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

NOTICE OF PUBLIC FILING OF UNSEALED DOCUMENTS

RUSSELL P. COHEN (SBN 213105)
Russ.cohen@dechert.com
HOWARD M. ULLMAN (SBN 206760)
Howard.ullman@dechert.com
DECHERT LLP
45 Fremont Street, 26th Floor
San Francisco, CA 94105
Telephone: (415) 262-4500
Facsimile: (415) 262-4555

NISHA PATEL (SBN 281628)
Nisha.patelgupta@dechert.com
DECHERT LLP
633 West 5th Street, Suite 4900
Los Angeles, CA 90071
Telephone: (213) 808-5700
Facsimile: (213) 808-5760

ANDREW J. LEVANDER (admitted *pro hac vice*)
Andrew.levander@dechert.com
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Telephone: (212) 698-3500
Facsimile: (212) 698-3599

JAY JURATA (admitted *pro hac vice*)
Jay.jurata@dechert.com
DECHERT LLP
1900 K Street, N.W.
Washington, DC 20006
Telephone: (202) 261-3300
Facsimile: (202) 261-3333

Attorneys for Defendant Microsoft Corporation

MARC TOBEROFF (CA SBN 188547)
MToberoff@toberoffandassociates.com
TOBEROFF & ASSOCIATES, P.C.
23823 Malibu Road, Suite 50-363
Malibu, CA 90265
Telephone: (310) 246-3333

STEVEN F. MOLO (*pro hac vice*)
ROBERT K. KRY (*pro hac vice*)
JENNIFER M. SCHUBERT (*pro hac vice*)
MOLOLAMKEN LLP
430 Park Avenue
New York, NY 10022
Telephone: (212) 607-8160

Attorneys for Plaintiffs Elon Musk and X.AI Corp.

Pursuant to the Court's Order dated December 30, 2025 (Dkt. No. 375), the Parties hereby file on the public docket the documents associated with Dkt. Nos. 328, 330, 351, 353, 358, and 360 that the Parties previously filed under seal but have now agreed to unseal, identified in the following chart and attached hereto. Consistent with the Court's Order, this submission does not include (1) documents that were already publicly filed in connection with the foregoing docket entries; and (2) documents that were filed provisionally under seal with proposed redactions or sealing requests that are still under consideration by the Court, even where the Parties have agreed that the documents may be publicly filed with proposed redactions.

Dkt. No.	Document
328-1	OpenAI Defendants' Notice of Motion and Motion for Summary Judgment
328-3	OpenAI Defendants' Separate Statement of Undisputed Material Facts
328-8	Ex. 4 to the Wiener Declaration in Support of the OpenAI Defendants' Motion for Summary Judgment ("Wiener Declaration")
328-9	Ex. 5 to the Wiener Declaration
328-10	Ex. 6 to the Wiener Declaration
328-11	Ex. 7 to the Wiener Declaration
328-12	Ex. 8 to the Wiener Declaration
328-13	Ex. 9 to the Wiener Declaration
328-14	Ex. 10 to the Wiener Declaration
328-15	Ex. 11 to the Wiener Declaration
328-17	Ex. 13 to the Wiener Declaration
328-21	Ex. 17 to the Wiener Declaration
328-22	Ex. 18 to the Wiener Declaration
328-23	Ex. 19 to the Wiener Declaration
328-24	Ex. 20 to the Wiener Declaration
328-38	Ex. 34 to the Wiener Declaration
328-39	Ex. 35 to the Wiener Declaration
328-40	Ex. 36 to the Wiener Declaration
328-48	Ex. 44 to the Wiener Declaration
328-49	Ex. 45 to the Wiener Declaration
328-50	Ex. 46 to the Wiener Declaration
328-51	Ex. 47 to the Wiener Declaration
328-52	Ex. 48 to the Wiener Declaration
328-53	Ex. 49 to the Wiener Declaration
328-54	Ex. 50 to the Wiener Declaration
328-61	Ex. 57 to the Wiener Declaration
328-62	Ex. 58 to the Wiener Declaration
328-68	Ex. 64 to the Wiener Declaration
328-75	Ex. 71 to the Wiener Declaration
328-76	Ex. 72 to the Wiener Declaration

328-79	Ex. 75 to the Wiener Declaration
328-81	Ex. 77 to the Wiener Declaration
328-82	Ex. 78 to the Wiener Declaration
330-1	Microsoft's Motion for Summary Judgment
330-2	Microsoft's Statement of Material Facts
330-6	Ex. 2 to Declaration of Russell P. Cohen in Support of Defendant Microsoft's Motion for Summary Judgment ("Cohen Declaration")
330-8	Ex. 3 to the Cohen Declaration
330-10	Ex. 4 to the Cohen Declaration
330-12	Ex. 5 to the Cohen Declaration
330-21	Ex. 10 to the Cohen Declaration
330-23	Ex. 11 to the Cohen Declaration
330-25	Ex. 12 to the Cohen Declaration
330-27	Ex. 13 to the Cohen Declaration
330-29	Ex. 14 to the Cohen Declaration
330-34	Ex. 18 to the Cohen Declaration
330-36	Ex. 19 to the Cohen Declaration
330-38	Ex. 20 to the Cohen Declaration
330-40	Ex. 21 to the Cohen Declaration
330-42	Ex. 22 to the Cohen Declaration
330-47	Ex. 25 to the Cohen Declaration
330-54	Ex. 29 to the Cohen Declaration
330-64	Ex. 34 to the Cohen Declaration
330-68	Ex. 36 to the Cohen Declaration
330-72	Ex. 38 to the Cohen Declaration
330-75	Ex. 40 to the Cohen Declaration
330-77	Ex. 41 to the Cohen Declaration
330-81	Ex. 44 to the Cohen Declaration
330-83	Ex. 45 to the Cohen Declaration
351-1	Plaintiff's Memorandum of Points and Authorities In Opposition to OpenAI Defendants' Motion for Summary Judgment
351-2	Plaintiff's Responsive Statement of Undisputed Material Facts
351-9	Ex. 6 to Hawes Declaration in Support of Plaintiff's Opposition ("Hawes Declaration")
351-13	Ex. 10 to the Hawes Declaration
351-14	Ex. 11 to the Hawes Declaration
351-17	Ex. 14 to the Hawes Declaration
351-18	Ex. 15 to the Hawes Declaration
351-22	Ex. 19 to the Hawes Declaration
351-27	Ex. 24 to the Hawes Declaration
351-29	Ex. 26 to the Hawes Declaration
351-30	Ex. 27 to the Hawes Declaration
351-31	Ex. 28 to the Hawes Declaration
351-32	Ex. 29 to the Hawes Declaration
351-34	Ex. 31 to the Hawes Declaration
351-35	Ex. 32 to the Hawes Declaration

351-37	Ex. 34 to the Hawes Declaration
351-39	Ex. 36 to the Hawes Declaration
351-40	Ex. 37 to the Hawes Declaration
351-41	Ex. 38 to the Hawes Declaration
351-46	Ex. 43 to the Hawes Declaration
351-47	Ex. 44 to the Hawes Declaration
351-48	Ex. 45 to the Hawes Declaration
351-49	Ex. 46 to the Hawes Declaration
351-54	Ex. 51 to the Hawes Declaration
351-57	Ex. 54 to the Hawes Declaration
351-59	Ex. 56 to the Hawes Declaration
351-61	Ex. 58 to the Hawes Declaration
351-63	Ex. 60 to the Hawes Declaration
351-65	Ex. 62 to the Hawes Declaration
351-67	Ex. 64 to the Hawes Declaration
351-71	Ex. 68 to the Hawes Declaration
353-1	Plaintiff's Memorandum of Points and Authorities In Opposition to Microsoft's Motion for Summary Judgment
353-2	Plaintiff's Responsive Statement of Undisputed Material Facts
353-7	Ex. 3 to Eynon Declaration in Support of Plaintiff's Opposition ("Eynon Declaration")
353-21	Ex. 17 to the Eynon Declaration
353-22	Ex. 18 to the Eynon Declaration
353-28	Ex. 24 to the Eynon Declaration
353-41	Ex. 37 to the Eynon Declaration
353-42	Ex. 38 to the Eynon Declaration
353-43	Ex. 39 to the Eynon Declaration
353-44	Ex. 40 to the Eynon Declaration
353-50	Ex. 46 to the Eynon Declaration
353-51	Ex. 47 to the Eynon Declaration
353-52	Ex. 48 to the Eynon Declaration
353-55	Ex. 51 to the Eynon Declaration
353-57	Ex. 53 to the Eynon Declaration
353-61	Ex. 57 to the Eynon Declaration
353-63	Ex. 59 to the Eynon Declaration
353-65	Ex. 61 to the Eynon Declaration
353-71	Ex. 67 to the Eynon Declaration
353-75	Ex. 71 to the Eynon Declaration
353-78	Ex. 74 to the Eynon Declaration
353-79	Ex. 75 to the Eynon Declaration
356-1	Corrected Exhibit 57 to Hawes Declaration originally filed at 351-60; request to file this corrected exhibit granted at ECF 375, fn 1.
358-1	Defendant Microsoft Corporation's Reply Brief in Support of its Motion for Summary Judgment
358-2	Defendant Microsoft's Reply to Responsive Statement of Undisputed Material Facts
358-5	Ex. 46 to Supplemental Declaration of Russell P. Cohen in Support of Microsoft's Motion for Summary Judgment ("Supplemental Cohen Declaration")

358-7	Ex. 48 to the Supplemental Cohen Declaration
360-1	OpenAI Defendants' Reply in Support of Motion for Summary Judgment
360-3	OpenAI Defendants' Reply Statement of Undisputed Material Facts in Support of Motion for Summary Judgment

Date: January 6, 2026

MORRISON & FOERSTER LLP

/s/ David J. Wiener
David J. Wiener (CA SBN 291659)

Attorneys for the OpenAI Defendants

Date: January 6, 2026

DECHERT LLP

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

Attorneys for Defendant Microsoft Corporation

Date: January 6, 2026

MOLOLAMKEN LLP

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

Attorneys for Plaintiffs Elon Musk and X.AI Corp.

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: January 6, 2026

/s/ David J. Wiener
David J. Wiener