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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 FILING REGARDING DISPUTED DISCOVERY DESIGNATIONS

Date: March 13, 2026
Time: 9:00 AM
Courtroom: 1 – 4th Floor
Judge: Hon. Yvonne Gonzalez Rogers

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Pursuant to Section 3(f) of the Court's Standing Order re: Pretrial Instructions in Civil Cases ("Standing Order"), 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 ("Microsoft") (together with Plaintiff Elon Musk and the OpenAI Defendants, the "Parties") hereby submit this joint statement regarding the parties' deposition designations and discovery excerpts.

Attachment A contains a Joint Statement of Disputed Discovery Designations for the Court's resolution pursuant to Section 3(f) of the Standing Order. **Attachment B** contains Musk's designations, Microsoft's objections and counter-designations, and Musk's cross-objections and cross-counter-designations. **Attachment C** contains Musk's designations, the OpenAI Defendants' objections and counter-designations, and Musk's cross-objections and cross-counter-designations. **Attachment D** contains the OpenAI Defendants' designations, Musk's objections and counter-designations, and the OpenAI Defendants' cross-objections and cross-counter-designations. **Attachment E** contains Microsoft's designations, Musk's objections and counter-designations, and Microsoft's cross-objections and cross-counter-designations.

Dated: February 26, 2026

MOLOLAMKEN LLP

By: /s/ Steven F. Molo
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Dated: February 26, 2026

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SIGNATURE ATTESTATION

Pursuant to Civil L.R. 5-1, I hereby attest that the signatories listed above, on whose behalf this Joint Compliance Statement is submitted, concur in the filing's content and have authorized the filing.

Dated: February 26, 2026

/s/ Steven F. Molo
Steven F. Molo (*pro hac vice*)