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 (*pro hac vice*)
WDSavitt@wlrk.com
BRADLEY R. WILSON (*pro hac vice*)
BRWilson@wlrk.com
SARAH K. EDDY (*pro hac vice*)
SKEddy@wlrk.com
STEVEN WINTER (*pro hac vice*)
SWinter@wlrk.com
NATHANIEL CULLERTON (*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 the OpenAI Defendants

(Additional counsel listed on 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

JOINT WITNESS LIST

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

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.

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 (*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 (*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

Pursuant to Section 3(c) of the Court's Standing Order re: Pretrial Instructions in Civil Cases (last updated March 17, 2025), and in advance of the Pretrial Conference set for March 13, 2026, Plaintiff Elon Musk and 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 Microsoft Corporation ("Microsoft") hereby submit their Joint Witness List, organized by party.

A. PLAINTIFF'S WITNESS LIST[1]

Plaintiff's Stage 1 Direct Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Jared Birchall*	Mr. Birchall is an assistant and financial advisor to Elon Musk. He is expected to testify primarily about Musk's monetary contributions to OpenAI.	0.5		Live

[1] * Denotes a primary witness. Plaintiff's Witness List assumes a time limit of 20 hours of Stage 1 trial testimony per side.

Greg Brockman*	Mr. Brockman is a founder and officer of OpenAI. He is expected to testify primarily about OpenAI's founding; OpenAI's nonprofit mission and status; Musk's contributions to OpenAI; the OpenAI Defendants' representations about their plans for OpenAI; OpenAI's for-profit activities; OpenAI's relationship with Microsoft; and the OpenAI Defendants' wrongful gains.	2.5		Live and/or Video
Rosie Campbell	Ms. Campbell is a former OpenAI employee. She is expected to testify primarily about changes to OpenAI's safety practices and teams.	0.5		Live
Tasha McCauley*	Ms. McCauley is a former OpenAI board member. She is expected to testify primarily about OpenAI's nonprofit mission and governance and OpenAI's subordination of its mission to for-profit activities.	0.5		Live or Video
Microsoft 30(b)(6)	Microsoft's corporate representative is expect to testify primarily about Microsoft's relationship with OpenAI; Microsoft's knowledge of OpenAI's nonprofit mission; and Microsoft's substantial assistance to OpenAI's for-profit activities.	0.5		Video
Ermira Murati	Ms. Murati is a former officer of OpenAI. She is expected to testify primarily about OpenAI's for-profit activities and OpenAI's relationship with Microsoft.	0.5		Live or Video

Elon Musk*	Mr. Musk is the Plaintiff and a co-founder of OpenAI. He is expected to testify primarily about the founders' communications concerning OpenAI's nonprofit mission and status; his monetary contributions to OpenAI; his non-monetary contributions to OpenAI; and the OpenAI Defendants' representations about their plans for OpenAI.	2.0		Live
Satya Nadella*	Mr. Nadella is Microsoft's CEO. He is expected to testify primarily about Microsoft's relationship with OpenAI; Microsoft's knowledge of OpenAI's nonprofit mission; and Microsoft's substantial assistance to OpenAI's for-profit activities.	1.0		Live and/or Video
OpenAI 30(b)(6)	OpenAI's corporate representative is expected to testify primarily about OpenAI's nonprofit mission and status; OpenAI's for-profit activities; and OpenAI's relationship with Microsoft.	0.5		Video
Ilya Sutskever	Mr. Sutskever is a co-founder and former officer of OpenAI. He is expected to testify primarily about the founders' communications concerning OpenAI's nonprofit mission and status and Musk's non-monetary contributions to OpenAI.	0.5		Live or Video
Helen Toner*	Ms. Toner is a former OpenAI board member. She is expected to testify primarily about OpenAI's nonprofit mission and governance and OpenAI's subordination of its mission to for-profit activities.	1.0		Live or Video

Shivon Zilis	Ms. Zilis is an associate of Elon Musk. She is expected to testify primarily about the founders' communications concerning OpenAI's nonprofit mission and status and the OpenAI Defendants' representations about their plans for OpenAI.	0.5		Live
Summary Witness	To be determined.	0.5		Live
Stuart Russell*	Summary of expert opinions and bases therefor are set out in the Joint Expert Witness List.	0.5		Live
David Schizer*	Summary of expert opinions and bases therefor are set out in the Joint Expert Witness List.	1.0		Live
Records Custodians	Authentication of records (as necessary)	0		Live
Plaintiff's Stage 1 Cross Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Joshua Achiam	*See* OpenAI's Witness List		0.3	Live
Sam Altman	*See* OpenAI's Witness List		2.5	Live
Yina Arenas	*See* Microsoft's Witness List		0.2	Live
Chris Clark	*See* OpenAI's Witness List		0.2	Live

Amy Hood	*See* Microsoft's Witness List		0.3	Live
Zico Kolter	*See* OpenAI's Witness List		0.2	Live
Kevin Scott	*See* Microsoft's Witness List		0.3	Live
Bret Taylor	*See* OpenAI's Witness List		0.3	Live
Sam Teller	*See* OpenAI's Witness List		0.3	Video
Michael Wetter	*See* Microsoft's Witness List		0.3	Live
Summary Witness	*See* OpenAI's Witness List		0	Live
Edward Buthusiem	*See* Microsoft's Witness List		0.3	Live
John Coates	*See* OpenAI's Witness List		0.3	Live
Louis Dudney	*See* OpenAI's Witness List		0.2	Live
Peter Frumkin	*See* OpenAI's Witness List		0.2	Live
Daniel Hemel	*See* OpenAI's Witness List		0.3	Live

Plaintiff's Stage 2 Witnesses (Remedy Stage)				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
C. Paul Wazzan*	Summary of expert opinions and bases therefor are set out in Joint Expert Witness List.	2.0		Live
Ilya Strebulaev	*See* OpenAI's Witness List		0.5	Live
Jonathan Arnold	*See* Microsoft's Witness List		0.5	Live

B. OPENAI DEFENDANTS' WITNESS LIST[2]

OpenAI Defendants' Stage 1 Direct Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)[3]**	**Cross Estimate (hrs)**	**Appearance**
Joshua Achiam	Dr. Achiam is a longtime employee of OpenAI. He is expected to testify about Plaintiff's departure from OpenAI in 2018, the pursuit of OpenAI's mission, and the contributions of OpenAI employees to the success of that mission.	0.5		Live
Sam Altman*	Mr. Altman is a founder of OpenAI, the CEO of OpenAI Group, and a director of both OpenAI Group and The OpenAI Foundation. He is expected to testify about OpenAI's founding, mission, structure, and history; Plaintiff's and others' contributions to OpenAI over the years; discussions among the founders about OpenAI's future in 2017 and 2018; the relationship between OpenAI and Plaintiff since Plaintiff's departure from OpenAI in 2018; the creation of an OpenAI for-profit entity in 2018; OpenAI's funding; OpenAI's partnership with Microsoft; Plaintiff's public attacks upon and bid for OpenAI; and the supposed promises Plaintiff claims were made to him.	3.5		Live

[2] * Denotes a primary witness.

[3] For witnesses the OpenAI Defendants expect to call live in their case and who will also be called in Plaintiff's case, time estimates are listed as "Direct Estimate" even though the examination will in many cases include cross-examination. For witnesses who may be called solely by deposition, the "Direct Estimate" refers to the time the OpenAI Defendants expect to spend presenting affirmative designations in their own case, and "Cross Estimate" refers to the time the OpenAI Defendants expect to spend presenting cross designations in Plaintiff's case. The descriptions of expected testimony set forth in this list are descriptions of expected direct testimony.

Jared Birchall	Mr. Birchall is an executive at multiple Musk-controlled businesses. He is expected to testify about Plaintiff's financial contributions to, and dealings with, OpenAI from 2016 onward; Plaintiff's directives to create an OpenAI for-profit in 2017; the creation of an OpenAI for-profit entity in 2018; and the corporate history of Plaintiff's own AI company, xAI.	0.75		Live
Greg Brockman*	Mr. Brockman is a founder of OpenAI and the President of OpenAI Group. He is expected to testify about OpenAI's founding, mission, and structure; Plaintiff's and others' contributions to OpenAI; Plaintiff's relationship with OpenAI from 2015 onward; OpenAI's technology and technological achievements; discussions among the founders about OpenAI's future in 2017 and 2018; and the supposed promises Plaintiff claims were made to him.	3.0		Live
Chris Clark	Mr. Clark is a former employee of, and current consultant to, OpenAI. He is expected to testify about Plaintiff's financial contributions to OpenAI.	0.5		Live
Zico Kolter	Dr. Kolter is a director of the OpenAI Foundation. He is expected to testify about OpenAI's mission and safety governance at OpenAI.	0.3		Live
Tasha McCauley	Ms. McCauley is a former director of OpenAI, Inc. She is expected to testify about OpenAI's mission, partnership with Microsoft, and open-sourcing practices, and about her actions as an OpenAI director.	0.3	0.2	By video deposition (unless live)

Ermira Murati	Ms. Murati is the CEO of Thinking Machines and former CTO of OpenAI. She is expected to testify about OpenAI's mission and partnership with Microsoft.	0.5	0.25	Live or by video deposition
Elon Musk*	Plaintiff Musk is a founder of OpenAI, the CEO of Tesla, Neuralink, and SpaceX, the CTO and founder of X Corp., and the CEO and founder of xAI. He is expected to testify about his relationship with OpenAI and its founders since 2015; the promises he claims were made to him; and his attacks on, and bid for, OpenAI in recent years.	4.0		Live and by video deposition
Satya Nadella	Mr. Nadella is the CEO of Microsoft. He is expected to testify about OpenAI's relationship with Microsoft.	0.2		Live
Bret Taylor	Mr. Taylor is chair of OpenAI Group and of the OpenAI Foundation. He is expected to testify about OpenAI's governance and structure and the activities of The OpenAI Foundation.	0.75		Live
Sam Teller	Mr. Teller is a former employee of several Musk-controlled companies and was Plaintiff's chief of staff from 2014 to 2019. He is expected to testify about Plaintiff's relationship and dealings with OpenAI during that period.	0.5		By video deposition (unless live)
Helen Toner	Ms. Toner is a former director of OpenAI, Inc. She is expected to testify about OpenAI's partnership with Microsoft and her actions as an OpenAI director.	0.2	0.5	By video deposition (unless live)

Ilya Sutskever*	Dr. Sutskever is a founder and former employee of OpenAI. He is expected to testify about OpenAI's founding, mission, and structure; the founders' contributions to OpenAI; OpenAI's technology and technological achievements; Plaintiff's relationship with OpenAI from 2015 onward; discussions among the founders about OpenAI's future in 2017 and 2018; and the supposed promises Plaintiff claims were made to him.	2.0		Live
Shivon Zilis*	Ms. Zilis is a former board member of OpenAI, Inc. and a former employee of Tesla and current employee of Neuralink. She is expected to testify about Plaintiff's relationship with OpenAI from 2016 onward; discussions among the founders about OpenAI's future in 2017 and 2018; her work for and interactions with Plaintiff from 2016 to 2023; and her actions as an OpenAI director.	2.0		Live
Summary Witness	To be determined	0.5		Live
John Coates [Rebuttal]	Summary of expert's opinions and the bases therefor are set out in the Joint Expert Witness List.	0.5		Live
Louis Dudney	Summary of expert's opinions and the bases therefor are set out in the Joint Expert Witness List.	0.5		Live
Peter Frumkin	Summary of expert's opinions and the bases therefor are set out in the Joint Expert Witness List.	0.25		Live

Daniel Hemel	Summary of expert's opinions and the bases therefor are set out in the Joint Expert Witness List.	0.5		Live
Ilya Strebulaev	Summary of expert's opinions and the bases therefor are set out in the Joint Expert Witness List.	0.25		Live
Records Custodians	Authentication of records (as necessary)	0		Live
OpenAI Defendants' Examination of Plaintiff's Other Stage 1 Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Rosie Campbell	*See* Plaintiff's Witness List		0.3	Live
OpenAI 30(b)(6)	*See* Plaintiff's Witness List		0.2	By video deposition
Stuart Russell	*See* Plaintiff's Witness List		0.5	Live
David Schizer	*See* Plaintiff's Witness List		0.75	Live

OpenAI Defendants' Stage 2 Witnesses (Remedy Stage)[4]				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Ilya Strebulaev [Rebuttal]	Summary of expert's opinions and the bases therefor are set out in the Joint Expert Witness List.	2.0		Live
C. Paul Wazzan	*See* Plaintiff's Witness List		2.0	Live

C. MICROSOFT'S WITNESS LIST

Microsoft's Stage 1 Direct Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct[5] Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Samuel Altman*	Mr. Altman, OpenAI's CEO, will testify about OpenAI's formation and corporate structure, including OpenAI's decision to create a for-profit subsidiary. He will further testify about OpenAI's collaboration with Microsoft and Microsoft's lack of knowledge regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties.	0.3		Live

[4] The OpenAI Defendants identify here only witnesses they expect will testify in connection with Stage 2 proceedings concerning monetary remedies. Should Plaintiff seek additional remedies from the Court, including injunctive or other equitable relief, the OpenAI Defendants reserve the right to present additional evidence and testimony relevant to those remedies.

[5] For witnesses Microsoft expects to call live in its case and who will also be called in Plaintiff's case, time estimates are listed as "Direct Estimate" even though the examination will in many cases include cross examination. For witnesses who may be called solely by deposition, the "Direct Estimate" refers to the time Microsoft expects to spend presenting affirmative designations in its own case, and "Cross Estimate" refers to the time Microsoft expects to spend presenting cross

Jared Birchall	Mr. Birchall oversees Mr. Musk's charitable giving and is employed by several of Mr. Musk's companies. If called, he will testify about Mr. Musk's contributions to OpenAI, deliberations over OpenAI's structure, including his awareness of OpenAI's creation of a for-profit subsidiary. He will further testify about his lack of communication with Microsoft regarding duties allegedly owed to Mr. Musk or the breach of any alleged duties.	0.2		Video deposition (unless called live)
Greg Brockman	If called, Mr. Brockman, OpenAI's President, will testify about OpenAI's formation and corporate structure, including OpenAI's decision to create a for-profit subsidiary. He will further testify about OpenAI's collaboration with Microsoft and Microsoft's lack of knowledge regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties.	0.1		Live
Edward Buthusiem*	Summary of expert's opinions and the bases therefore are set out in the Joint Expert Witness List.	0.5		Live
Amy Hood	If called, Ms. Hood, the Chief Financial Officer of Microsoft, will testify about Microsoft's collaboration with OpenAI. She will also testify about Microsoft's lack of knowledge regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties. She will further respond to other assertions Mr. Musk has made or may make.	0.5		Live

designations in Plaintiff's case. Microsoft reserves the right to further supplement, trim, add, or otherwise modify these time estimates based on overlap with designations that the OpenAI Defendants might play and/or the parties' continued meet and confers.

Satya Nadella*	Mr. Nadella, the Chairman and Chief Executive Officer of Microsoft, will testify about Microsoft's collaboration with OpenAI. He will also testify about Microsoft's commitment to responsible AI and AI safety measures. He will further testify about Microsoft's lack of knowledge regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties. Moreover, he will testify about Microsoft's support of OpenAI during Mr. Altman's November 2023 firing and subsequent rehiring. He will further respond to other assertions Mr. Musk has made or may make.	1.0		Live
Tasha McCauley	If called, Ms. McCauley, a former OpenAI Board member, will testify about OpenAI's decision to create a for-profit subsidiary. She will further testify about Microsoft's collaboration with OpenAI, including the OpenAI Board's related approvals. She will also testify about her lack of communication with Microsoft regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties.	0.1	0.1	Video deposition (unless called live)

Ermira Murati*	Ms. Murati, OpenAI's former Chief Technology Officer, will testify about OpenAI's corporate structure and operation, including OpenAI's decision to begin commercializing its models. She will further testify about OpenAI's collaboration with Microsoft and Microsoft's lack of knowledge regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties. Further, she will testify about Microsoft's support of OpenAI during Mr. Altman's November 2023 firing and subsequent rehiring.	0.3	0.2	Video deposition (unless called live)
Elon Musk*	Mr. Musk, the Plaintiff, will testify about his lack of communication with Microsoft regarding commitments relating to his donations or any alleged breach. He will further testify about OpenAI's need for compute and capital, as well as the cost of compute. Further, he will testify about his knowledge regarding Microsoft's collaboration with OpenAI no later than September 2020 and as early as 2019.	0.3		Live and/or by video deposition
Kevin Scott*	Mr. Scott, the Chief Technology Officer of Microsoft, will testify about Microsoft's collaboration with OpenAI. He will also testify about Microsoft's commitment to responsible AI and AI safety measures. Further, he will testify about Microsoft's lack of knowledge regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties. He will also respond to other assertions Mr. Musk has made or may make.	0.4		Live

Ilya Sutskever	If called, Mr. Sutskever, a former OpenAI board member and OpenAI cofounder, will testify about OpenAI's decision to create a for-profit subsidiary. He will further testify about Microsoft's collaboration with OpenAI, including the OpenAI Board's related approvals. He will also testify about his lack of communication with Microsoft regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties.	0.1		Video deposition (unless called live)
Samuel Teller	If called, Mr. Teller, former director of the office of the CEO at Mr. Musk's companies, will testify about OpenAI's deliberations over its structure, including his awareness of OpenAI's creation of a for-profit. He will also testify about his lack of communication with Microsoft regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties.	0.2	0.1	Video deposition (unless called live)
Michael Wetter*	Michael Wetter, Microsoft's Corporate Vice President of Corporate Development, will testify about Microsoft's collaboration with OpenAI, including Microsoft's related due diligence. He will also testify about Microsoft's lack of knowledge regarding duties allegedly owed to Musk and the breach of any alleged duties. He will further respond to other assertions Mr. Musk has made or may make.	0.4		Live

Shivon Zilis*	Ms. Zilis, a former OpenAI Board member, will testify about OpenAI's decision to create a for-profit subsidiary. She will further testify about Microsoft's collaboration with OpenAI, including the OpenAI Board's related approvals. She will also testify about her lack of communication with Microsoft regarding duties allegedly owed to Mr. Musk and the breach of any alleged duties.	0.2		Video deposition (unless called live)

Microsoft's Stage 1 Cross of OpenAI's Other Witnesses[6]

Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Zico Kolter	*See* OpenAI's Witness List		0.1	Live
Bret Taylor	*See* OpenAI's Witness List		0.2	Live
John Coates	*See* OpenAI's Witness List		0.1	Live
Peter Frumkin	*See* OpenAI's Witness List		0.1	Live
Daniel Hemel	*See* OpenAI's Witness List		0.1	Live

[6] "Other witnesses" refers to witnesses that do not appear on Microsoft's direct witness list and which Microsoft expects to cross examine.

Microsoft's Stage 1 Cross of Plaintiff's Other Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Rosie Campbell	*See* Plaintiff's Witness List		0.1	Live
Microsoft 30(b)(6)	*See* Plaintiff's Witness List		0.25	Video
OpenAI 30(b)(6)	*See* Plaintiff's Witness List		0.2	Video
Helen Toner *	*See* Plaintiff's Witness List		0.2	Live or Video
Summary Witness	*See* Plaintiff's Witness List		0.1	Live
Stuart Russell	*See* Plaintiff's Witness List		0.2	Live
David Schizer	*See* Plaintiff's Witness List		0.25	Live

Microsoft's Stage 2 Direct Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Yina Arenas	Microsoft would only call Ms. Arenas for any post-trial remedy proceeding. If called, Ms. Arenas, Microsoft's Vice President of Product, Azure AI Platform, will testify about Microsoft's products and services that utilize OpenAI's models.	0.5		Live
Jonathan Arnold*	Summary of expert's opinions and the bases therefore are set out in the Joint Expert Witness List.	1.0		Live
Microsoft's Stage 2 Cross of OpenAI's Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
Ilya Strebulaev	*See* OpenAI's Witness List		0.1	Live
Microsoft's Stage 2 Cross of Plaintiff's Witnesses				
Witness	**Brief Statement of Substance of Testimony**	**Direct Estimate (hrs)**	**Cross Estimate (hrs)**	**Appearance**
C. Paul Wazzan*	*See* Plaintiff's Witness List		0.5	Live

DATED: February 26, 2026

WACHTELL, LIPTON, ROSEN & KATZ

/s/ William Savitt
William Savitt (*pro hac vice*)

MORRISON & FOERSTER LLP

/s/ William Frentzen
William Frentzen (CA SBN 343918)

Attorneys for the OpenAI Defendants

DATED: February 26, 2026

DECHERT LLP

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

Attorneys for Defendant Microsoft Corporation

DATED: February 26, 2026

MOLOLAMKEN LLP

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

Attorneys for Plaintiff Elon Musk

ECF ATTESTATION

I, William Frentzen, am the ECF User whose ID and password are being used to file this **JOINT WITNESS LIST**. 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: February 26, 2026

/s/ William Frentzen
William Frentzen