

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE:
OPENAI, INC., COPYRIGHT
INFRINGEMENT LITIGATION,**

ECF CASE

1:25-MD-03143-SHS/OTW

This Document Relates To:

Case No. 1:23-cv-08292-SHS-OTW

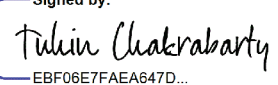
Case No. 1:23-cv-10211-SHS-OTW

DECLARATION OF DR. TUHIN CHAKRABARTY

I, Tuhin Chakrabarty, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am over the age of eighteen and, if called as a witness, could competently testify to the matters set forth herein.
2. I am an Assistant Professor at the Computer Science Department of Stony Brook University.
3. I co-authored a paper titled *Generative AI Floods and Dilutes the Market for Books* (“Paper”).
4. The Paper was not funded by Susman Godfrey or any other Plaintiffs’ counsel.
5. My institution was retained by Susman Godfrey for work related to the *In re Mosaic LLM Litigation*, Case No. 3:24-cv-01451-CRB (N.D. Cal.), and was compensated for that work. The money Susman Godfrey paid for the *Mosaic* assignment did not fund the Paper. Plaintiffs’ counsel did not provide any comments or edits to the Paper.
6. Had Susman Godfrey funded the Paper, I would have disclosed it in the Paper.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 1, 2026, in Palo Alto, California.

Signed by:

/s/ EBF06E7FAEA647D...
Tuhin Chakrabarty, PhD