

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

USA TODAY CO., INC.; GANNETT
SATELLITE INFORMATION NETWORK, LLC;
GANNETT GP MEDIA, INC.; THE COURIER-
JOURNAL, INC.; DES MOINES REGISTER
AND TRIBUNE COMPANY; DETROIT FREE
PRESS, INC.; DETROIT NEWSPAPER
PARTNERSHIP, L.P.; CA FLORIDA
HOLDINGS, LLC; SCRIPPS NP OPERATING,
LLC; CA NORTH CAROLINA HOLDINGS,
INC.; GATEHOUSE MEDIA OKLAHOMA
HOLDINGS, INC.; JOURNAL SENTINEL INC.;
GATEHOUSE MEDIA OHIO HOLDINGS II,
INC.; and PHOENIX NEWSPAPERS, INC.,

Plaintiffs,

v.

OPENAI FOUNDATION; OPENAI GP, LLC;
OAI INTERNATIONAL, INC.; OPENAI OPCO,
LLC; OPENAI GLOBAL, LLC; OAI
CORPORATION; and OPENAI GROUP PBC,

Defendants.

Civil Action No. _____

COMPLAINT

JURY TRIAL DEMANDED

Plaintiffs USA TODAY Co., Inc.; Gannett Satellite Information Network, LLC; Gannett GP Media, Inc.; The Courier-Journal, Inc.; Des Moines Register and Tribune Company; Detroit Free Press, Inc.; Detroit Newspaper Partnership, L.P.; CA Florida Holdings, LLC; Scripps NP Operating, LLC; CA North Carolina Holdings, Inc.; GateHouse Media Oklahoma Holdings, Inc.; Journal Sentinel Inc.; GateHouse Media Ohio Holdings II, Inc.; and Phoenix Newspapers, Inc., who are all owned by USA TODAY Co., Inc. (collectively, the “USA TODAY Plaintiffs”), by and through their attorneys, Rothwell, Figg, Ernst & Manbeck, P.C., respectfully bring this Complaint against Defendants OpenAI Foundation; OpenAI GP, LLC; OAI International, Inc.;

OpenAI OpCo, LLC; OpenAI Global, LLC; OAI Corporation; and OpenAI Group PBC (collectively, “OpenAI” or “Defendants”).

NATURE OF THE ACTION

1. In this lawsuit, the USA TODAY Plaintiffs join the long list of copyright holders who have filed lawsuits against OpenAI and other AI companies for copyright infringement, many of which have been consolidated in this Court.

2. Together, the USA TODAY Plaintiffs own copyrights in content published by 19 different publications: *USA TODAY*, *The Tennessean*, *Indy Star*, *The Bergen Record*, *The Enquirer*, *Asbury Park Press*, *Democrat & Chronicle*, *The Knoxville News-Sentinel*, *Naples Daily News*, *The Oklahoman*, *Milwaukee Journal Sentinel*, *The Columbus Dispatch*, *The Arizona Republic*, *The Courier-Journal*, *The Des Moines Register*, *Detroit Free Press*, *The Detroit News*, *The Palm Beach Post*, and *Star News* (collectively, the “USA TODAY Publications”).

3. The USA TODAY Plaintiffs have protected the value of their print and online work. Each of their publications includes copyright management information as defined in 17 U.S.C. § 1202(c). Their registered copyrights are attached as Exhibit A. This material is referred to collectively as the “USA TODAY Plaintiffs’ content.”

4. OpenAI’s large language models (“LLMs”) were trained on copyrighted material scraped from the internet without authorization—regardless of paywalls or other access restrictions—and without regard for the rights of publishers and authors. As Sam Altman, OpenAI’s founder and CEO, candidly acknowledged in testimony before the British House of Lords, his company’s models depend on copyrighted material:

Because copyright today covers virtually every sort of human expression—including blog posts, photographs, forum posts, scraps of software code, and government documents—it would be impossible to train today’s leading AI models without using copyrighted materials. **Limiting training data to public domain books and drawings created more than a century**

ago might yield an interesting experiment, but would not provide AI systems that meet the needs of today’s citizens.¹

5. A Microsoft executive described OpenAI’s unauthorized use of copyrighted content as “an astonishing theft of unprecedented proportions” and perhaps the “largest theft of labor in human history.”²

6. OpenAI deliberately chose to use copyrighted works without permission, disregarding the rights of authors and publishers whose livelihoods depend on respect for their creative efforts. OpenAI did not merely steal the copyrighted works used to train its models; it did so using programs designed to strip away Copyright Management Information (“CMI”), which indicated that the works were protected by valid copyrights.

7. OpenAI’s internal communications confirm that it deliberately targeted news content and knew its models were built to reproduce it. OpenAI’s Co-Founder and President Greg Brockman told his colleagues that OpenAI’s models were “particularly good at predicting text of news articles,” “excellent at news,” and “very good at any news task.” In a 2020 presentation, then-OpenAI research leader Dario Amodei listed “News Generation” among GPT-3’s “Skills.”³

8. OpenAI’s models have “memorized” the copyrighted works they ingested. Before OpenAI implemented litigation-inspired safeguards, its models would reproduce verbatim or near-verbatim copies of copyrighted content when prompted. And because users demand current information, OpenAI must continuously feed its models new copyrighted material—ensuring that its infringement is not a past wrong but an ongoing one.

¹ OpenAI, Written Evidence Submitted to the House of Lords Communications and Digital Committee, Large Language Models Inquiry (Dec. 2023), available at <https://committees.parliament.uk/writtenevidence/126981/pdf/>.

² *In re OpenAI, Inc. Copyright Infringement Litig.*, No. 25-md-3143, Dkt. No. 1977-1, at 1 (S.D.N.Y. Sept. 17, 2025).

³ *Id.* at 1-2, 53-54.

9. OpenAI understood that its models memorize training data. OpenAI’s VP of Research explained: “We train our networks to memorize the training data — that’s their objective.” By November 2019, OpenAI internally expressed concern about its models “accidentally regenerating copyrighted works.” By 2020, OpenAI understood that GPT-3 had memorized training items and that even a single exposure during training “causes some degree of memorization,” and recognized that its API “might output existing content verbatim.” By 2021, OpenAI considered prevention of memorization important “for fair use [compliance] and minimizing copyright violations in model output.” In June 2022, OpenAI employees acknowledged that GPT-4 would have “memorized a ton of data and therefore will be insanely good at regurgitation.”⁴

10. Indeed, the “safeguards” OpenAI implemented were designed not to stop infringement but to conceal it. OpenAI’s output filters did not suppress output of content from any entity that had not sued it. A Microsoft executive who raised the issue internally called the approach an “accidental cover up” because it left “people who have a right over the content having less visibility into what was used for training.”⁵

11. OpenAI’s violations were willful. OpenAI knew that its models had “memorized” the content OpenAI trained them on and would reproduce it verbatim or near-verbatim when prompted. These violations continue today and are committed knowingly and intentionally in disregard of the rights of those who research, investigate, write, and publish the news that OpenAI’s products appropriate daily.

12. The U.S. Constitution grants Congress the authority “[t]o promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive

⁴ *Id.* at 11-12.

⁵ *Id.* at 13.

Right to their respective Writings and Discoveries.” U.S. Const. art. I, § 8, cl. 8. Exercising this authority, Congress has enacted laws that erect barriers against copyright theft and authorize substantial penalties for those who violate copyright owners’ rights.

13. In this lawsuit, the USA TODAY Plaintiffs seek damages in excess of \$250 million. Upon information and belief, OpenAI’s models have copied hundreds of thousands of articles and other materials from the USA TODAY Publications. The law provides that the USA TODAY Plaintiffs may recover up to \$150,000 for each willful copyright infringement, plus up to \$25,000 per violation for OpenAI’s stripping of copyright management information.

14. OpenAI violated the USA TODAY Plaintiffs’ copyrights in their content by scraping from the USA TODAY Publications’ websites or otherwise acquiring it to train OpenAI’s models and by reproducing and repackaging the USA TODAY Plaintiffs’ content in outputs to OpenAI users.

15. OpenAI’s unauthorized use of the USA TODAY Plaintiffs’ content has done real and continuing damage to their publications. When OpenAI provides outputs reproducing or repackaging content taken from the USA TODAY Publications’ websites, users have no reason to visit the original sources or pay for a subscription. As one OpenAI software engineer acknowledged, “no matter how prominently [OpenAI] show[s] the links, users won’t click.”⁶

16. This lawsuit seeks to hold OpenAI accountable and to obtain the relief the USA TODAY Plaintiffs are entitled to under the law.

⁶ *In re OpenAI*, Dkt. No. 1977-1, at 67.

JURISDICTION AND VENUE

17. The Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the Copyright Act of 1976, 17 U.S.C. § 101, et seq., as well as other federal laws.

18. Jurisdiction over Defendants is proper because they have purposely availed themselves of the privilege of conducting business in New York. A substantial portion of OpenAI's widespread infringement and other unlawful conduct alleged herein occurred in New York, including the distribution and sales of OpenAI's Generative Pre-trained Transformer ("GPT")-based products like ChatGPT, ChatGPT Enterprise, and related application programming interface (API) tools within New York to New York residents. Furthermore, OpenAI maintains offices and employs personnel in New York who, upon information and belief, were involved in the creation, maintenance, or monetization of OpenAI's widespread infringement and other unlawful conduct alleged herein.

19. Venue is proper under 28 U.S.C. § 1400(a) because Defendants and/or their agents reside or may be found in this District, and because of the infringing and unlawful activities that occurred in this District.

20. Venue is also proper under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the USA TODAY Plaintiffs' claims occurred in this District, including the marketing, sales, and licensing of OpenAI products built on the infringement and other misuse of the USA TODAY Plaintiffs' intellectual property within this District. Upon information and belief, OpenAI has sold subscriptions for ChatGPT products to New York residents, and OpenAI enjoys a substantial base of monthly active users of ChatGPT products in New York. OpenAI has licensed its GPT models to New York residents and companies headquartered in New York. For example,

OpenAI has struck deals to license its GPT models to the Associated Press (“AP”) and Morgan Stanley, both companies headquartered in New York.

THE PARTIES

21. Plaintiff USA TODAY Co., Inc., is a Delaware corporation with its principal place of business in Pittsford, New York. USA TODAY Co., Inc. owns copyrights in content published by the *Democrat & Chronicle* (democratandchronicle.com), which is available on its website and as a printed newspaper. USA TODAY Co., Inc.’s copyright registrations are set forth in Exhibit A at 4-47.

22. Plaintiff Gannett Satellite Information Network, LLC is a Delaware limited liability company with its principal place of business in Pittsford, New York. Gannett Satellite Information Network, LLC owns copyrights in content published by several publications, including *USA TODAY* (usatoday.com), *Indy Star* (indystar.com), *The Bergen Record* (northjersey.com), and *Asbury Park Press* (app.com), which are available on their websites and as printed newspapers. Gannett Satellite Information Network, LLC’s copyright registrations are set forth in Exhibit A at 1-4 (*Asbury Park Press*), 190-204 (*Indy Star*), 219-222 (*The Bergen Record*), and 711-717 (*USA TODAY*).

23. Plaintiff Gannett GP Media, Inc. is a Delaware corporation with its principal place of business in Pittsford, New York. Gannett GP Media, Inc. owns copyrights in content published by *The Tennessean* (tennessean.com) and *The Enquirer* (cincinnati.com), which are available on their websites and as printed newspapers. Gannett GP Media, Inc.’s copyright registrations are set forth in Exhibit A at 431-445 (*The Enquirer*), 698-711 (*The Tennessean*).

24. Plaintiff Scripps NP Operating, LLC is a Wisconsin limited liability company with its principal place of business in Pittsford, New York. Scripps NP Operating, LLC owns copyrights in content published by *The Knoxville News-Sentinel* (knoxnews.com) and the *Naples Daily News*

(naplesnews.com), which are available on their websites and as printed newspapers. Scripps NP Operating, LLC's copyright registrations are set forth in Exhibit A at 445-451 (*The Knoxville News-Sentinel*), 207-214 (*Naples Daily News*).

25. Plaintiff GateHouse Media Oklahoma Holdings, Inc. is a Delaware corporation with its principal place of business in Pittsford, New York. GateHouse Media Oklahoma Holdings, Inc. owns copyrights in content published by *The Oklahoman* (oklahoman.com), which is available on its website and as a printed newspaper. GateHouse Media Oklahoma Holdings, Inc.'s copyright registrations are set forth in Exhibit A at 451-689.

26. Plaintiff Journal Sentinel, Inc. is a Wisconsin corporation with its principal place of business in Pittsford, New York. Journal Sentinel, Inc. owns copyrights in content published by the *Milwaukee Journal Sentinel* (jsonline.com), which is available on its website and as a printed newspaper. Journal Sentinel, Inc.'s copyright registrations are set forth in Exhibit A at 204-207.

27. Plaintiff GateHouse Media Ohio Holdings II, Inc. is a Delaware corporation with its principal place of business in Pittsford, New York. GateHouse Media Ohio Holdings II, Inc. owns copyrights in content published by *The Columbus Dispatch* (dispatch.com), which is available on its website and as a printed newspaper. GateHouse Media Ohio Holdings II, Inc.'s copyright registrations are set forth in Exhibit A at 222-239.

28. Plaintiff Phoenix Newspapers, Inc. is an Arizona corporation with its principal place of business in Pittsford, New York. Phoenix Newspapers, Inc. owns copyrights in content published by *The Arizona Republic* (www.azcentral.com), which is available on its website and as a printed newspaper. Phoenix Newspapers, Inc.'s copyright registrations are set forth in Exhibit A at 216-219.

29. Plaintiff The Courier-Journal, Inc. is a Delaware corporation with its principal place of business in Pittsford, New York. The Courier-Journal, Inc. owns copyrights in content published by *The Courier-Journal* (courier-journal.com), which is available on its website and as a printed newspaper. The Courier-Journal, Inc.'s copyright registrations are set forth in Exhibit A at 239-251.

30. Plaintiff Des Moines Register and Tribune Company is an Iowa corporation with its principal place of business in Pittsford, New York. Des Moines Register and Tribune Company owns copyrights in content published by *The Des Moines Register* (desmoinesregister.com), which is available on its website and as a printed newspaper. Des Moines Register and Tribune Company's copyright registrations are set forth in Exhibit A at 47-62.

31. Plaintiff Detroit Free Press, Inc. is a Michigan corporation with its principal place of business in Pittsford, New York. Detroit Free Press, Inc. owns copyrights in content published by the *Detroit Free Press* (freep.com), which is available on its website and as a printed newspaper. Detroit Free Press, Inc.'s copyright registrations are set forth in Exhibit A at 62-190.

32. Plaintiff Detroit Newspaper Partnership, L.P. is a Delaware limited partnership with its principal place of business in Pittsford, New York. Detroit Newspaper Partnership, L.P. owns copyrights in content published by *The Detroit News* (detroitnews.com), which is available on its website and as a printed newspaper. Detroit Newspaper Partnership, L.P.'s copyright registrations are set forth in Exhibit A at 251-431.

33. Plaintiff CA Florida Holdings, LLC is a Delaware limited liability company with its principal place of business in Pittsford, New York. CA Florida Holdings, LLC owns copyrights in content published by *The Palm Beach Post* (palmbeachpost.com), which is available on its

website and as a printed newspaper. CA Florida Holdings, LLC's copyright registrations are set forth in Exhibit A at 689-698.

34. Plaintiff CA North Carolina Holdings, Inc. is a Delaware corporation with its principal place of business in Pittsford, New York. CA North Carolina Holdings, Inc. owns copyrights in content published by the *Star News* (starnewsonline.com), which is available on its website and as a printed newspaper. CA North Carolina Holdings, Inc.'s copyright registrations are set forth in Exhibit A at 214-218.

35. Defendant OpenAI Foundation, formerly known as OpenAI, Inc. until October 2025, is a Delaware nonstock nonprofit corporation with a principal office in San Francisco, California. OpenAI, Inc. was formed in December 2015. At least until October 28, 2025, OpenAI, Inc. indirectly owned and controlled all other OpenAI entities and was directly involved in perpetrating the mass infringement and other unlawful conduct alleged here. Upon information and belief, since then, OpenAI Foundation has indirectly owned and controlled all other OpenAI entities and has been directly involved in perpetrating the mass infringement and other unlawful conduct alleged herein.

36. Defendant OpenAI GP, LLC is a Delaware limited liability company with a principal place of business located in San Francisco, California. It is a wholly owned subsidiary of OpenAI Group PBC. OpenAI GP, LLC previously managed OpenAI LP (n/k/a OpenAI OpCo, LLC) through January 1, 2026. OpenAI GP, LLC was and/or is involved in perpetrating the mass infringement and unlawful exploitation of the USA TODAY Plaintiffs' content alleged herein.

37. Defendant OAI International, Inc., which converted from a limited liability company known as OpenAI, LLC (which was formed in September 2020) on or about December 31, 2025, is a Delaware corporation with a principal place of business in San Francisco, California.

OAI International, Inc. is a wholly owned subsidiary of OpenAI OpCo, LLC. OAI International, Inc. was and/or is involved in perpetrating the mass infringement and unlawful exploitation of the USA TODAY Plaintiffs' content alleged herein.

38. Defendant OpenAI OpCo, LLC, formerly known as OpenAI LP until January 2023, is a Delaware limited liability company with a principal place of business located in San Francisco, California. OpenAI OpCo, LLC was and/or is involved in perpetrating the mass infringement and unlawful exploitation of the USA TODAY Plaintiffs' content alleged herein.

39. Defendant OpenAI Global, LLC is a Delaware limited liability company formed in December 2022 and has a principal place of business in San Francisco, California. OpenAI Foundation has a majority stake in OpenAI Global, LLC. OpenAI Global, LLC was and/or is involved in perpetrating the mass infringement and unlawful exploitation of the USA TODAY Plaintiffs' content alleged herein.

40. Defendant OAI Corporation, which converted from a limited liability company known as OAI Corporation, LLC in September 2023, is a Delaware corporation with a principal place of business in San Francisco, California. OAI Corporation was and/or is involved in perpetrating the mass infringement and unlawful exploitation of the USA TODAY Plaintiffs' content alleged herein.

41. On or about October 28, 2025, OpenAI published the following statements on its website:⁷

OpenAI has completed its recapitalization, simplifying its corporate structure. The nonprofit remains in control of the for-profit, and now has a direct path to major resources before AGI arrives.

The nonprofit, now called the OpenAI Foundation, holds equity in the for-profit currently valued at approximately \$130 billion, making it one of the best resourced

⁷ See Bret Taylor, *Built to Benefit Everyone*, OPENAI (Oct. 28, 2025), <https://openai.com/index/built-to-benefit-everyone/>; *Our Structure*, OPENAI, <https://openai.com/our-structure/> (last visited Oct. 6, 2026).

philanthropic organizations ever. The recapitalization also grants the Foundation additional ownership as OpenAI's for-profit reaches a valuation milestone.

- With our updated structure, announced on October 28, 2025:

The nonprofit is now the OpenAI Foundation.

The for-profit is now a public benefit corporation, called OpenAI Group PBC, which—unlike a conventional corporation—is required to advance its stated mission and consider the broader interests of all stakeholders, ensuring the company's mission and commercial success advance together.

The OpenAI Foundation continues to control the OpenAI Group. It now holds conventional equity in OpenAI Group—with all stockholders participating proportionally in any increase in value of the OpenAI Group – aligning long-term incentives around impact and growth.

OpenAI Foundation and OpenAI Group have the same mission.

42. Defendant OpenAI Group PBC is a for-profit Delaware public benefit corporation with its principal place of business in San Francisco, California.⁸ OpenAI Holdings, LLC merged into OpenAI Group PBC on or about December 31, 2025. OpenAI Group PBC was and is involved in perpetrating the mass infringement and unlawful exploitation of the USA TODAY Plaintiffs' content alleged herein.

FACTUAL ALLEGATIONS

A. The USA TODAY Plaintiffs and Publications

43. The USA TODAY Plaintiffs share the same parent company, USA TODAY Co., Inc. USA TODAY Co., Inc., formerly Gannett Co., Inc., is a diversified media company with expansive reach at the national and local level that traces its history back to 1906. USA TODAY Co., Inc. publishes *USA TODAY* along with hundreds of daily publications across the United States, including the USA TODAY Publications: *Asbury Park Press*, *The Bergen Record*, *The Enquirer*, *The Columbus Dispatch*, *The Des Moines Register*, *Detroit Free Press*, *The Detroit*

⁸ *Id.*; see also *In re OpenAI*, Dkt. No. 1686, at 9.

News, *Indianapolis Star*, *The Knoxville News-Sentinel*, *The Courier-Journal*, *Milwaukee Journal Sentinel*, *Naples Daily News*, *The Tennessean*, *The Oklahoman*, *The Palm Beach Post*, *The Arizona Republic*, *Democrat & Chronicle*, and *Star News*. Collectively, the USA TODAY Publications have won dozens of Pulitzer Prizes and employ hundreds of journalists across thirteen states.

44. The USA TODAY Publications invest heavily in original reporting and the reporters and staff who create it. OpenAI’s unlawful theft of their content imperils their future. OpenAI took the journalism that the USA TODAY Publications have spent decades building—and turned it into a company worth, according to its latest projections, almost \$1 trillion. That theft violated the protections afforded under U.S. law.

45. *USA TODAY*, founded in 1982, has been a cornerstone of the national media landscape. Since its inception, *USA TODAY* has delivered high-quality, trusted content with a commitment to balanced, unbiased journalism.

46. The *Asbury Park Press* traces its origins back to 1879 and has won major national and state journalism awards, including a Pulitzer Prize. Today, it stands as the third-largest daily newspaper in New Jersey, covering Ocean and Monmouth counties while maintaining a distinguished track record of award-winning investigative coverage.

47. Established in 1895, *The Bergen Record* stands as one of New Jersey’s primary daily news sources, providing regional, state, and local coverage across Bergen, Essex, Hudson, and Passaic counties. The publication maintains a major multi-platform presence—anchored digitally by NorthJersey.com—delivering investigative, sports, and breaking news coverage to a broad statewide audience. It won the prestigious Gerald Loeb Award in 1996 for its investigative series “*Formula for Disaster: The Lodi Explosion*,” which investigated a chemical plant explosion at Napp Technologies in Lodi, New Jersey, and directly led to monumental federal safety reforms.

48. *The Enquirer* has been exploring the news and views of the Greater Cincinnati area since 1841 serving Greater Cincinnati and Northern Kentucky daily. It won the 2018 Pulitzer Prize for local reporting for its project titled “Seven Days of Heroin,” which documented a week in Greater Cincinnati’s heroin epidemic.

49. Serving Ohio since 1871, *The Columbus Dispatch* delivers essential coverage of breaking news, politics, business, sports, and entertainment. Alongside its digital home at Dispatch.com, the publication also functions as a comprehensive marketing partner, equipping businesses with tailored solutions, data insights, and expert services. Recently, it won top honors as the best large newspaper in Ohio with its second consecutive General Excellence Award from the Ohio Associated Press Managing Editors.

50. With a history dating back to 1849 and 17 Pulitzer Prizes to its name, *The Des Moines Register* is a prominent multimedia platform delivering comprehensive news alongside advanced business marketing services. Reaching more than 75 counties, it commands a larger adult audience than any other media outlet across Iowa. Beyond its flagship publication, the media group encompasses 10 community and weekly newspapers, targeted special sections, and a robust network of digital and mobile destinations such as DesMoinesRegister.com, HawkCentral.com, DMJuice.com, and RAGBRAI.com.

51. As Michigan’s oldest news organization and premier media brand established in 1831, the *Detroit Free Press* provides trusted coverage across print, digital, and mobile channels. Reaching audiences via Freep.com and its print editions, the publication delivers award-winning reporting on business, sports, politics, and culture, offering investigative and community-driven journalism throughout the state. It has won 10 Pulitzer Prizes.

52. Established in 1873, *The Detroit News* stands as a premier daily publication and a cornerstone of information for communities throughout Michigan. The publication spans print, web, and mobile channels to provide thorough reporting on local news, politics, business, the automotive sector, sports, and culture. Alongside its award-winning journalism and photography, including three Pulitzer Prizes, the outlet offers targeted advertising solutions that empower local companies to effectively reach and engage their key target audiences.

53. Operating out of downtown Indianapolis since 1903, the *Indianapolis Star* has been a foundational source for news, analysis, and sports across Central Indiana. As a multi-time Pulitzer Prize winner, the publication delivers deep, reliable journalism tailored to Indianapolis and its surrounding communities.

54. Since 1886, *The Knoxville News-Sentinel* has been East Tennessee's premier source for award-winning journalism, breaking news, and local sports. The publication keeps communities deeply connected through trusted daily reporting, insightful commentary, and powerful digital storytelling.

55. *The Courier-Journal* is the premier media voice for the Louisville metro area and delivers trusted reporting, commentary, and community insights across Kentucky and Southern Indiana. It engages millions of readers via print, digital, and mobile channels with deep coverage of the people and issues shaping the region. Dedicated to strengthening the communities it serves, the outlet provides impactful journalism alongside effective marketing solutions that bridge the gap between local businesses and their audiences. It has won 10 Pulitzer Prizes and numerous state and national journalism awards throughout its history.

56. With roots dating back to 1837, the *Milwaukee Journal Sentinel* is Wisconsin's premier news organization and anchors its digital presence at JSOnline.com as a top online

destination for local users. The publication delivers comprehensive multimedia reporting—spanning print, digital, writing, photography, and video—tailored to navigate a changing world while serving both its readers and business partners. It frequently earns national journalism awards and has won multiple Pulitzer Prizes.

57. Since 1923, the *Naples Daily News* has stood as the premier authority for Collier and southern Lee counties in Florida, delivering exceptional coverage that spans hard-hitting investigations, vibrant arts and culture, local dining, and the natural beauty of Southwest Florida. This multi-award-winning publication consistently raises the standard for regional journalism, offering readers unmatched, real-time insights from critical breaking news and local sports to the area's best culinary experiences.

58. Dating as far back as 1907, *The Tennessean* serves as a powerful civic champion dedicated to enhancing the quality of life throughout Nashville and Middle Tennessee. This deeply respected publication is known for its culturally resonant storytelling and unwavering commitment to public advocacy and impact journalism. The outlet remains an indispensable guide for the local community, connecting residents to the vital issues, music, culture, and political movements shaping the areas of coverage. It has won three Pulitzer Prizes.

59. For well over a century, *The Oklahoman* has stood as an indispensable pillar of the state. Beyond its enduring legacy of daily reporting, the publication is widely celebrated for its journalistic excellence, proudly earning multiple First Amendment Awards from the Society of Professional Journalists and consistent top-10 national rankings from the Associated Press Sports Editors. It continues to set the benchmark for regional journalism, keeping citizens informed, empowered, and deeply connected to Oklahoma.

60. Spanning a vast seven-county footprint—Palm Beach, Martin, St. Lucie, Okeechobee, Indian River, Hendry, and Glades—*The Palm Beach Post* has served the South Florida community since 1916. Built on an unwavering commitment to unbiased and award-winning journalism and Pulitzer Prize-winning photography, the publication acts as a fierce community watchdog and a trusted chronicler of the region’s growth, culture, and public interest. Beyond its editorial mission, the publication serves as an engine for the local economy, offering advertising solutions that help businesses forge meaningful connections with the region’s consumers.

61. As Arizona’s largest newspaper and a flagship daily publication based in Phoenix, *The Arizona Republic* has been an essential fixture of the Southwest since its founding. Widely circulated across the entire state, the publication is celebrated for its deep-rooted civic leadership, Pulitzer Prize-winning reporting, and comprehensive watchdog journalism that holds public officials accountable. Anchored digitally by azcentral.com, the brand delivers breaking news alongside rich, in-depth coverage of regional politics, local culture, the state’s booming business sector, and vibrant community life.

62. For nearly 200 years, the *Democrat & Chronicle* has served as the journalistic lifeblood of Rochester and western New York. As the region’s sole remaining daily print newspaper, the publication is widely celebrated for its tenacious local reporting, deep community roots, and unwavering commitment to public-service journalism. The outlet continues to guide, hold accountable, and unite communities across the Genesee Valley. The New York State Associated Press Association presented it with the New York State First Amendment Award in 2017 for its commitment to press freedom and watchdog reporting. In 2024, it earned multiple New York News Publishers Association Awards.

63. Founded in 1867, the *Star News* holds the distinction of being North Carolina's oldest continuously published daily newspaper, serving as a trusted, foundational voice for the Cape Fear region. The publication delivers rigorous multi-platform reporting across print, web, and mobile channels to readers throughout New Hanover, Brunswick, and Pender counties. Anchored digitally by StarNewsOnline.com, the *Star News* is celebrated for its vital coastal coverage and deep-rooted civic engagement—chronicling everything from regional business development and local sports to cultural milestones and breaking news. It regularly receives awards from the North Carolina Press Association for its journalism and coverage.

B. The OpenAI Defendants

64. OpenAI was formed in December 2015 as a “non-profit artificial intelligence research company.” OpenAI started with \$1 billion in seed money from its founders, a group of wealthy technology entrepreneurs and investors, and companies like Amazon Web Services and InfoSys. This group included Elon Musk, the CEO of Tesla and X Corp. (formerly known as Twitter); Reid Hoffman, the co-founder of LinkedIn; Sam Altman, the former president of Y Combinator; and Greg Brockman, the former Chief Technology Officer of Stripe.

65. Despite accepting very large investments from enormously wealthy companies and individuals at its founding, OpenAI originally maintained that its research and work would be entirely unmotivated by profit.

66. OpenAI was founded as a nonprofit. In a December 11, 2015, press release, it wrote: “Our goal is to advance digital intelligence in the way that is most likely to benefit humanity as a whole, unconstrained by a need to generate financial return. Since our research is free from financial obligations, we can better focus on a positive human impact.”⁹ In accordance with that

⁹ Greg Brockman & Ilya Sutskever, *Introducing OpenAI*, OPENAI (Dec. 11, 2015), <https://openai.com/blog/introducing-openai>.

mission, OpenAI promised that its work and intellectual property would be open and available to the public, that its “[r]esearchers will be strongly encouraged to publish their work, whether as papers, blog posts, or code” and that its “patents (if any) will be shared with the world.”¹⁰ Those promises didn’t last.

67. Despite its early promises of altruism, OpenAI quickly became a for-profit business built in large part on the unlicensed exploitation of copyrighted works belonging to the USA TODAY Plaintiffs and others. Around 2017, OpenAI co-founder and President Greg Brockman wrote that he was “deeply motivated by the gazillions” he hoped to gain by commercializing OpenAI’s technology.¹¹ Just three years after its founding, OpenAI shed its exclusively nonprofit status. It created OpenAI, LP in March 2019, a for-profit company conducting the majority of OpenAI’s operations and raising capital from investors seeking a return.

68. In the same year, Microsoft invested \$1 billion in OpenAI, the first of many such investments. At the time, OpenAI described the purpose of the partnership as “building artificial general intelligence (AGI) with widely distributed economic benefits,” and “to develop a hardware and software platform within Microsoft Azure which will scale to AGI.”¹²

69. Since 2019, Microsoft and OpenAI have exchanged copies of publishers’ copyrighted content in what OpenAI’s Chief Research Officer Bob McGrew described as “a trade: the idea [was] that we’re giving data to them and they are giving data to us.” Over a three-year period, Microsoft provided OpenAI with a copy of the Bing Index—a compilation of billions of webpages scraped for Microsoft’s search engine—including the USA TODAY Plaintiffs’ content, in an initiative codenamed “Project Taxi.” Microsoft separately developed and operated a crawler,

¹⁰ *Id.*

¹¹ *In re OpenAI*, Dkt. No. 1977-1, at 5.

¹² Greg Brockman, *Microsoft Invests in and Partners with OpenAI to Support Us Building Beneficial AGI*, OPENAI (July 22, 2019), <https://openai.com/index/microsoft-invests-in-and-partners-with-openai/> (last visited Oct. 6, 2026).

“Project Mango,” on OpenAI’s behalf to “collect as many of the documents as possible for their training,” for which OpenAI paid Microsoft.¹³

70. OpenAI’s corporate structure grew into an intricate web of for-profit holding, operating, and shell companies that manage OpenAI’s day-to-day operations and grant OpenAI’s investors authority and influence over OpenAI’s operations, all while raising billions in capital from investors. The result: Today, OpenAI is a commercial enterprise valued at \$852 billion.¹⁴

71. In June 2026, OpenAI announced that it had filed with the U.S. Securities and Exchange Commission for an initial public offering expected to generate hundreds of billions of dollars.¹⁵

72. With the shift to a for-profit company, OpenAI also abandoned its commitment to openness. OpenAI released GPT-1 and GPT-2 on an open-source basis in 2018 and 2019, but as OpenAI sought to commercialize its models, OpenAI changed course starting with the release of GPT-3 in 2020, shortly after OpenAI LP and other for-profit OpenAI entities were formed and took control of product design and development.

73. GPT-3.5 and GPT-4 were both orders of magnitude more powerful than the two previous generations, yet OpenAI continued to keep their design and training (including the copyrighted content on which the models were trained) entirely a secret. For previous generations, OpenAI had voluminous reports detailing the contents of the training set, design, and hardware of the LLMs. Not so for GPT-3.5 or GPT-4. For GPT-4, for example, the “technical report” that OpenAI released said: “this report contains no further details about the architecture (including model size), hardware, training compute, dataset construction, training method, or similar.”¹⁶ In

¹³ *In re OpenAI*, Dkt. No. 1977-1, at 31-33.

¹⁴ *Accelerating the Next Phase of AI*, OPENAI (Mar. 2026), <https://openai.com/index/accelerating-the-next-phase-ai/>.

¹⁵ <https://www.nytimes.com/2026/06/08/technology/openai-ipo.html>

¹⁶ OpenAI, *GPT-4 Technical Report* (2023), <https://cdn.openai.com/papers/gpt-4.pdf>.

other words, when OpenAI began commercializing its models, it stopped disclosing details about its training datasets, thereby hiding the identity and scale of the copyrighted works OpenAI had taken from rightsholders like the USA TODAY Plaintiffs to power its commercial models and products. OpenAI has also kept the training data of its subsequent commercial models a secret, including GPT-4 Turbo, GPT-4o, GPT-4o mini, o1, o1-pro, o1-mini, GPT-4.5, o3, o4, GPT-4.1, GPT-5, GPT-5.1, GPT-5.2, GPT-5.3, GPT-5.4, GPT-5.5, GPT-5.6, GPT-6, and GPT-6.1

74. OpenAI’s former Chief Scientist, Ilya Sutskever, justified this secrecy on commercial grounds: “It’s competitive out there And there are many companies who want to do the same thing, so from a competitive side, you can see this as maturation of the field.” But its effect was clearly to conceal the identity of the data OpenAI copied to train its latest models from rightsholders like the USA TODAY Plaintiffs.

75. OpenAI became a household name upon the release of ChatGPT in November 2022. ChatGPT is a text-generating chatbot that, given user-generated prompts, can mimic humanlike natural language responses. ChatGPT was an instant viral sensation, reaching one million users within a month of its release and gaining over 100 million users within three months.

76. In March 2026, OpenAI described itself as “the fastest technology platform to reach 10 million users, the fastest to 100 million users, and soon the fastest to 1 billion weekly active users.”¹⁷

77. In July 2025, OpenAI reported that users send more than 2.5 billion messages to ChatGPT per day-including more than 330 million prompts per day in the United States alone. As of March 2026, ChatGPT had more than 900 million weekly active users and over 50 million paying subscribers.¹⁸

¹⁷ *Accelerating the Next Phase of AI*, *supra* note 14.

¹⁸ *Id.*

78. OpenAI has publicly acknowledged the significant role that news content plays in ChatGPT's usage. In February 2026, OpenAI stated that "the demand for reliable local news is already visible inside ChatGPT at a rate of about 1 million prompts per week," with users seeking information about community events, local businesses, crime and emergency response, legislation, courts, and public policy.¹⁹

79. OpenAI's API platform has likewise become a major commercial product. As of March 2026, OpenAI reported that its APIs process more than 15 billion tokens per minute.²⁰

80. OpenAI, through OpenAI OpCo, LLC and at the direction of OpenAI, Inc., OpenAI LP, and other OpenAI entities, offers a suite of services powered by its LLMs, targeted to both ordinary consumers and businesses. OpenAI's business-focused offerings include ChatGPT Enterprise and ChatGPT API tools designed to enable developers to incorporate ChatGPT into bespoke applications. OpenAI also licenses its technology to corporate clients for licensing fees. Some of these offerings can be accessed without charge, but OpenAI charges a fee for the use of its more powerful or specialized offerings.

81. The OpenAI models at issue in this lawsuit include GPT-1, GPT-2, GPT-3, GPT-3.5, GPT-3.5 Turbo, GPT-4, GPT-4 Turbo, GPT-4o, GPT-4o mini, o1, o1-pro, o1-mini, GPT-4.5, o3, o4, GPT-4.1, GPT-5, GPT-5.1, GPT-5.2, GPT-5.3, GPT-5.4, GPT-5.5, GPT-5.6, GPT-6, GPT-6.1, GPT-OSS, and all variations thereof, including all "Instant," "Thinking," "mini," "nano," and "Pro" variants.

82. In addition, OpenAI offers the following GPT-powered products and features that leverage its LLMs: the OpenAI application programming interface ("API") platform, ChatGPT

¹⁹ OpenAI Global Affairs, *A Different Path on Local News* (Feb. 2026), <https://openaiglobalaffairs.substack.com/p/a-different-path-on-local-news>.

²⁰ *Accelerating the Next Phase of AI*, *supra* note 14.

(Free, Pro, Plus), ChatGPT Enterprise, ChatGPT Business (formerly ChatGPT Team), ChatGPT Plugins and Custom GPTs / GPTs (including the original Browse with Bing plugin), ChatGPT Search (formerly SearchGPT), ChatGPT Agent (formerly Operator), and ChatGPT Atlas.

83. OpenAI's models and products have been immensely valuable for OpenAI. Over 92% of Fortune 500 companies are using ChatGPT.²¹ OpenAI's founder Sam Altman anticipates annual revenues of \$100 billion by 2027, and as noted above, OpenAI's recent recapitalization valued OpenAI at approximately \$852 billion. In August 2026, OpenAI announced that its advertising business had reached a \$1 billion annualized revenue run rate.²²

84. OpenAI's commercial success rests on large-scale copyright infringement. One of the central features driving the use and sales of ChatGPT and its associated products is the LLM's ability to produce natural language text in a variety of styles. To achieve this result, OpenAI made numerous reproductions of copyrighted works, including the USA TODAY Plaintiffs' content, in the course of developing its large language models and products as discussed in detail further below.

85. Upon information and belief, all of the Defendants have been either directly involved in, or profited from, OpenAI's widespread infringement and commercial exploitation of the USA TODAY Plaintiffs' content.

86. OpenAI, Inc. controlled and directed the widespread reproduction, distribution, and commercial use of the USA TODAY Plaintiffs' content perpetrated by OpenAI LP and OpenAI Global, LLC, through a series of holding and shell companies that include OpenAI Holdings, LLC,

²¹ Hayden Field, *Microsoft-backed OpenAI announces GPT-4 Turbo, its most powerful AI yet*, CNBC (Nov. 6, 2023), <https://www.cnbc.com/2023/11/06/openai-announces-more-powerful-gpt-4-turbo-and-cuts-prices.html>.

²² *Expanding Access to AI with ChatGPT Ads*, OPENAI (Aug. 31, 2026), <https://openai.com/index/expanding-access-to-ai-with-chatgpt-ads/>.

OpenAI GP, LLC, and OAI Corporation, LLC. OpenAI LP and OpenAI Global, LLC were directly involved in the design, development, and commercialization of OpenAI's GPT-based products, and directly engaged in the widespread reproduction, distribution, and commercial use of this content. OpenAI LP and OpenAI Global, LLC also controlled and directed OpenAI, LLC and OpenAI OpCo, LLC, which were involved in distributing, selling, and licensing OpenAI's GPT-based products, and thus monetized the reproduction, distribution, and commercial use of this content. As noted above, as of October 28, 2025, these entities are now under the organizational umbrellas of OpenAI Foundation and OpenAI Group PBC.

C. How GenAI Models Work

87. In the course of developing its models and products, OpenAI has unlawfully collected, created, and distributed copies of the USA TODAY Plaintiffs' content in several ways.

88. At the collection stage, OpenAI collects and stores a vast amount of content scraped from the internet, including content scraped from the USA TODAY Publications' websites. OpenAI uses the scraped content for a variety of purposes, including creating datasets used to train the LLMs.

89. At the training stage, OpenAI trains its LLMs on the training datasets by a process that feeds the data through its LLMs to generate output. Appending the output of an LLM to its input and feeding it back into the model produces sentences and paragraphs word by word. This is how ChatGPT products generate responses to user queries, or "prompts."

90. LLMs encode as numbers called "parameters" the information from the training datasets that they use to make these predictions.

91. The process of setting the values for an LLM's parameters during the training process involves storing copies of the training data (e.g., a *USA TODAY* article) in computer

memory, providing a portion of the article to the model, and adjusting the parameters of the model so that the model accurately predicts the next word in the article.

92. After being trained on a large corpus, models may be further subject to “fine-tuning” by, for example, performing additional rounds of training using specific types of works to better mimic their content or style, or providing the models with human feedback to reinforce desired or suppress undesired behaviors in order to improve the model’s ability to follow instructions.

93. Models trained in this way are known to exhibit a behavior called “memorization.”²³ That is, given the right prompt, LLMs will repeat large portions of materials they were trained on. This phenomenon shows that LLM parameters encode retrievable copies of many of those training works.

94. Memorization is not a bug in OpenAI’s models—it is the design objective. As OpenAI’s VP of Research stated, “[w]e train our networks to memorize the training data — that’s their objective.”²⁴

95. Once trained, LLMs may be provided with information specific to a use case or subject matter in order to “ground” their outputs. This is accomplished through a process called retrieval augmented generation or “RAG.” For example, an LLM may be asked to generate a text output based on specific external data, such as a document, provided as context. Using this method, OpenAI’s LLM search applications: (1) receive an input, such as a question; (2) retrieve relevant documents related to the input prior to generating a response; (3) combine the original input with the retrieved documents in order to provide context; and (4) provide the combined data

²³ Gerrit J.J. van den Burg & Christopher K.I. Williams, *On Memorization in Probabilistic Deep Generative Models*, 34 *Advances Neural Info. Processing Sys.* (2021), <https://proceedings.neurips.cc/paper/2021/file/eae15aabaa768ae4a5993a8a4f4fa6e4-Paper.pdf>.

²⁴ *In re OpenAI*, Dkt. No. 1977-1, at 12.

to an LLM, which generates a natural-language response. As shown below, search results generated in this way may extensively copy or closely paraphrase works that the models themselves may not have memorized.

D. OpenAI’s Unauthorized Use and Copying of the USA TODAY Plaintiffs’ Content

96. OpenAI created and distributed reproductions of the USA TODAY Plaintiffs’ content in several, independent ways in the course of: (i) scraping or acquiring scraped copies of the USA TODAY Publications’ websites, (ii) pre-training, training, and fine-tuning its LLMs, and (iii) operating the products that incorporate them.

1. Unauthorized Reproduction of the USA TODAY Plaintiffs’ Content During Content Acquisition and GPT Model Training

97. OpenAI’s GPT models are a family of LLMs, the first of which was introduced in 2018, followed by GPT-2 in 2019, GPT-3 in 2020, GPT-3.5 in 2022, GPT-4 and GPT-4 Turbo in 2023, GPT-4o and GPT-4o mini in May-July 2024, o1 in September 2024, o3 in January-April 2025, GPT-4.5 research preview in February 2025, GPT-4.1 in April 2025, GPT-5 and GPT-OSS in August 2025, GPT-5.1 in November 2025, GPT-5.2 in December 2025, GPT-5.3 in February 2026, GPT-5.4 in March 2026, GPT-5.5 in April 2026, GPT-5.6 in July 2026, and GPT-6 and GPT-6.1 in September 2026.

98. The “chat” style LLMs were developed in two stages. First, a transformer model was pre-trained on a very large amount of data. Second, the model was “fine-tuned” on a much smaller, supervised dataset in order to help the model solve specific tasks. As noted, OpenAI has introduced numerous additional models, and continues to develop new and/or derivative models using these methods.

99. The pre-training step involved collecting and storing text content to create training datasets and processing that content through the GPT models. While OpenAI has not released its

training data, OpenAI has published general information about its pre-training process for the GPT models.²⁵

100. GPT-2 includes 1.5 billion parameters, which was a 10X scale-up of GPT.²⁶ The training dataset for GPT-2 includes an internal corpus OpenAI built called “WebText,” which includes “the text contents of 45 million links posted by users of the ‘Reddit’ social network.”²⁷ The contents of the WebText dataset were created as a “new web scrape which emphasizes document quality.”²⁸

101. The WebText dataset contains a large amount of content scraped from the USA TODAY Publications’ websites, including usatoday.com. GPT-3 includes 175 billion parameters and was trained on the datasets listed in the following table.²⁹

Dataset	Quantity (tokens)	Weight in training mix	Epochs elapsed when training for 300B tokens
Common Crawl (filtered)	410 billion	60%	0.44
WebText2	19 billion	22%	2.9
Books1	12 billion	8%	1.9
Books2	55 billion	8%	0.43
Wikipedia	3 billion	3%	3.4

102. Collectively, the USA TODAY Plaintiffs’ content comprises more than 160,000 entries in the WebText dataset, including 83,266 entries from usatoday.com, 12,994 entries from freep.com, 9,814 entries from jsonline.com, 9,073 entries from azcentral.com, 7,028 entries from detroitnews.com, 6,726 entries from indystar.com, 6,194 entries from cincinnati.com, 6,082 entries from dispatch.com, 5,396 entries from tennessean.com, 5,178 entries from

²⁵ *Better Language Models and Their Implications*, OPENAI (Feb. 14, 2019), <https://openai.com/research/better-language-models>.

²⁶ *Id.*

²⁷ *GPT-2 Model Card*, GITHUB (Nov. 2019), https://github.com/openai/gpt-2/blob/master/model_card.md.

²⁸ Alec Radford, *et al.*, *Language Models Are Unsupervised Multitask Learners* (2019), https://cdn.openai.com/better-language-models/language_models_are_unsupervised_multitask_learners.pdf.

²⁹ Tom B. Brown, *et al.*, *Language Models Are Few-Shot Learners* (2020), <https://arxiv.org/pdf/2005.14165.pdf>.

palmbeachpost.com, 4,925 entries from newsok.com, and 4,911 entries from desmoinesregister.com.³⁰

103. Internal OpenAI communications recognize that news articles are the most prevalent type of content in the WebText dataset, including articles from news publishers' domains. OpenAI's WebText2 dataset likewise disproportionately contains news content.³¹

104. OpenAI developed the WebText2 dataset to prioritize high value content. Like the original WebText, it is composed of popular outbound links from Reddit. As shown in the table above, the WebText2 corpus was weighted 22% in the training mix for GPT-3 despite constituting less than 4% of the total tokens in the training mix. Like the original WebText, OpenAI describes WebText2 as a "high-quality" dataset that is "an expanded version of the WebText dataset ... collected by scraping links over a longer period of time."³²

105. The most highly weighted dataset in GPT-3, Common Crawl, is a "copy of the Internet" made available by an eponymous 501(c)(3) organization run by wealthy venture capital investors.³³ According to publicly available tax statements, in 2023 OpenAI made a \$250,000 contribution to Common Crawl.³⁴

106. The USA TODAY Publications' domains account for over 122 million tokens (basic units of text) in a filtered English-language subset of a 2019 snapshot of Common Crawl known as "C4," including 23M tokens from usatoday.com, 12M tokens from azcentral.com, 8.2M tokens from freep.com, 8.1M tokens from jsonline.com, 8.1M tokens from detroitnews.com, 7.8M tokens from cincinnati.com, 7.6M tokens from indystar.com, 6.5M tokens from tennessean.com,

³⁰ *gpt-2/domains.txt*, GITHUB, <https://github.com/openai/gpt-2/blob/master/domains.txt> (last visited Oct. 6, 2026).

³¹ *In re OpenAI*, Dkt. No. 1977-1, at 8-9.

³² Brown, *et al.*, *supra* note 29, at 8.

³³ *Frequently Asked Questions*, COMMON CRAWL, <https://commoncrawl.org/faq> (last visited Oct. 6, 2026).

³⁴ Common Crawl Found., Return of Organization Exempt from Income Tax (Form 990) (2023), ProPublica Nonprofit Explorer, <https://projects.propublica.org/nonprofits/organizations/261635908/202403189349101980/full>.

5.1M tokens from desmoinesregister.com, 4.8M tokens from northjersey.com, 4.4M tokens from democratandchronicle.com, 4.0M tokens from dispatch.com, 3.8M tokens from naplesnews.com, 3.5M tokens from app.com, 3.2M tokens from knoxnews.com, 3.1M tokens from courier-journal.com, 1.7M tokens from palmbeachpost.com, 300k tokens from starnewsonline.com, and 59k tokens from newsok.com.³⁵

107. Critically, OpenAI admits that “datasets we view as higher-quality are sampled more frequently” during training.³⁶ Accordingly, by OpenAI’s own admission, high-quality content, including the USA TODAY Plaintiffs’ content, was more important and valuable for training the GPT models as compared to content taken from other, lower-quality sources.

108. While OpenAI has not released much information about GPT-4, experts suspect that GPT-4 includes around 1.8 trillion parameters, which is over 10 times larger than GPT-3, and was trained on approximately 13 trillion tokens.³⁷ The training set for GPT-3, GPT-3.5, and GPT-4 comprised 45 terabytes of data—the equivalent of a Microsoft Word document that is over 3.7 billion pages long.³⁸

109. On information and belief, OpenAI has used, and continues to use, the WebText, WebText2, and other training datasets to train the GPT models. For example, ChatGPT’s “knowledge cutoff date”—the last date for which the model has knowledge—has shifted from as early as September 2021 to as recently as February 2026, signaling that OpenAI continues to acquire scraped copyrighted content to train its models. The more recent knowledge cutoff date

³⁵ Kevin Schaul, Szu Yu Chen & Nitasha Tiku, *Inside the Secret List of Websites That Make AI Like ChatGPT Sound Smart*, WASHINGTON POST (Apr. 19, 2023), <https://www.washingtonpost.com/technology/interactive/2023/ai-chatbot-learning/>.

³⁶ Brown, *et al.*, *supra* note 29.

³⁷ Maximilian Schreiner, *GPT-4 Architecture, Datasets, Costs and More Leaked*, THE DECODER (July 11, 2023), <https://the-decoder.com/gpt-4-architecture-datasets-costs-and-more-leaked/>.

³⁸ Kindra Cooper, *OpenAI GPT-3: Everything You Need to Know [Updated]*, SPRINGBOARD (Sept. 27, 2023), <https://www.springboard.com/blog/data-science/machine-learning-gpt-3-open-ai/>.

demonstrates that OpenAI continues to create and use the USA TODAY Plaintiffs’ content contained in the training datasets and elsewhere on the internet.

110. Indeed, OpenAI’s internal communications confirm that it deliberately seeks out current news content. OpenAI used curated datasets targeting news during “mid-training” to “crush freshness”—i.e., to succeed at providing recent information—“in the domain of real-world news,” treating a news-article dataset as a “natural source of freshness” and seeking to improve “current events / news articles (NYT data)” using “high quality (and fresh) data relevant for [its] users.”³⁹

111. OpenAI repeatedly copied the USA TODAY Publications’ websites without a license from, or compensation to, the USA TODAY Plaintiffs. As part of training the GPT models, OpenAI and its partners developed a complex, bespoke supercomputing system to house and reproduce copies of the training dataset, including copies of the USA TODAY Plaintiffs’ and other works. Hundreds of thousands of the articles and other materials were copied and ingested—multiple times—for the purpose of “training” OpenAI’s models.

112. OpenAI’s large-scale commercial exploitation of the USA TODAY Plaintiffs’ content is not licensed. OpenAI never asked permission. It never offered payment. It simply took the USA TODAY Plaintiffs’ work and used it to build products worth hundreds of billions of dollars.

2. Unauthorized Reproductions and Derivatives of the USA TODAY Plaintiffs’ Content Embodied in the GPT Models and Unauthorized Public Display of Their Content in GPT Product Outputs

113. As further evidence that OpenAI uses unauthorized copies of the USA TODAY Plaintiffs’ content during training and in RAG operations, the GPT LLMs themselves have “memorized” copies of many of those works encoded into their parameters. As shown below, the

³⁹ *In re OpenAI*, Dkt. No. 1977-1, at 12.

current GPT-4 model will output near-verbatim copies and summaries of the USA TODAY Plaintiffs' content when prompted to do so.

114. Such memorized examples constitute unauthorized copies or derivative works of the USA TODAY Plaintiffs' content used to train the model. OpenAI directly engaged in the unauthorized reproduction and publication of this content as part of generative output provided by its products built on the GPT models. OpenAI's commercial applications built using GPT models, listed above, include, *inter alia*, ChatGPT (including its associated offerings, ChatGPT Plus, ChatGPT Enterprise) and OpenAI's API Platform. These products display the USA TODAY Plaintiffs' content in generative output in at least two ways: (1) by showing "memorized" copies or derivatives retrieved from the models themselves, and (2) by showing LLM search results that are substantially similar to this content, generated from copies that OpenAI has obtained from a repository (e.g., a search index) or from the internet in real-time.

115. For example, ChatGPT displays copies or derivatives of the USA TODAY Plaintiffs' content memorized by the underlying GPT models in response to user prompts. Upon information and belief, the underlying GPT models for ChatGPT were trained on these and many more of the USA TODAY Plaintiffs' works and are able to generate such expansive summaries and verbatim text.

116. The explanation of (i) the means by which OpenAI acquired the USA TODAY Plaintiffs' content for use in its models and products, (ii) the means by which OpenAI has used this content in the development and operation of its models and products, and (iii) OpenAI's recognition that its models have a propensity to regurgitate their training data establish at least a reasonable inference that (x) OpenAI's models and products were trained on, have memorized, and regurgitate this content, and (y) all of this content is available and produced when prompted

by user queries. Further information regarding the regurgitation and output of the USA TODAY Plaintiffs' content is solely in OpenAI's possession, custody, and control.

117. LLM search products built on the GPT LLMs output the contents of search results, including the USA TODAY Plaintiffs' content that may not have been included in the LLMs' training set through RAG. As noted above, RAG includes receiving a prompt from a user, using the prompt to search for this content from the internet, providing the prompt together with a copy as additional context for the LLM, and having the LLM use the content to create natural-language substitutes that serve the same informative purpose as the original.

118. Indeed, OpenAI intended that its products would provide substitutive summaries of copyrighted articles. OpenAI instructed its models to summarize copyrighted articles by affirmatively post-training its models to do so in lieu of returning the articles themselves.⁴⁰

119. The contents of such LLM responses often go far beyond the snippets typically shown with ordinary search results. Even when LLM search responses include links to source materials, users have less need to navigate to those sources because their expressive content is already included in the narrative result. Indeed, such indication of attribution may make users more likely to trust the summary alone and not click through to the relevant USA TODAY Publications' website to verify the information.

120. OpenAI acknowledged that its products would divert traffic from original sources. OpenAI's Head of ChatGPT acknowledged that once ChatGPT gives an answer, there is "no good reason to click" on a link to the underlying source.⁴¹

121. In this way, LLM search results divert important traffic away from online content owned by copyright holders like the USA TODAY Plaintiffs. A user who has already read the

⁴⁰ *Id.* at 31.

⁴¹ *Id.* at 54.

latest news, even—or especially—with attribution to a USA TODAY Publication, has less reason to visit the original source.

122. Below are a few illustrative and non-exhaustive examples of LLM search results that include misappropriated content from the USA TODAY Plaintiffs. Full versions of each of these examples are provided in Exhibit B.

123. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: FBI raids home, business of Westfield developer,” GPT-5.6 retrieved an *Indianapolis Star* article

and output an extensive multi-section summary paraphrasing and following the same structural organization as the original article. See Ex. B at 29.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: FBI raids home, business of Westfield developer Article identified The article is an Indianapolis Star report by Alexandria Burris, published July 17, 2026. It concerns federal searches connected to Westfield, Indiana, developer James Andrew "Andy" Card. (aol.com) In-depth summary On July 16, 2026, FBI agents searched Card's home and business. The FBI characterized the searches only as "court-authorized law enforcement activity" and declined to disclose the investigation's precise scope. Card did not comment to the newspaper, and—critically—had not been charged with a crime when the article was published. (aol.com) The searches occurred the same day federal prosecutors sought the civil forfeiture of a four-bedroom, six-bath waterfront property on Marco Island, Florida, owned by Card and his wife, Martha. The property reportedly cost \$6.6 million. Prosecutors allege money intended for the publicly financed Mishawaka Fieldhouse helped fund its purchase. (aol.com) The underlying development project Card owns Indianapolis-based Card & Associates, which develops and operates sports complexes and wellness facilities. Its projects include the Pacers Athletic Center in Westfield and the Mishawaka Fieldhouse. The City of Mishawaka hired Card's company to develop the approximately \$38 million Mishawaka Fieldhouse, an indoor complex containing hardwood courts and turf fields. The project was supported by public financing, including tax-increment-financing funds and an economic-development grant. (aol.com) Under the development agreement, Card could receive his contractual fee, but the remaining public money was supposed to be used exclusively for legitimate project expenses. Prosecutors' allegations The forfeiture filing alleges that from October 2022 through October 2024, Card submitted multiple requests for construction-related disbursements. Prosecutors contend that some statements in those requests were false and that portions of the resulting payments were moved into personal accounts rather than spent on the fieldhouse. The filing describes the alleged conduct as an effort to defraud Mishawaka and other involved parties. It also says the transfers could ultimately be traced through wire transactions despite alleged attempts to obscure where the money went. These remain government allegations presented in forfeiture proceedings, not findings from a criminal conviction. (aol.com) Connection to the Florida property According to the filing, Martha Card was the sole mortgage applicant for the Marco Island home. Its purchase required: • A \$1.5 million down payment • Approximately \$1.2 million at closing Mortgage records reportedly included two gift letters from Andy Card to his wife: • A \$1 million gift dated August 7, 2023 • A separate \$1.2 million gift Each letter stated that repayment was not expected. Prosecutors allege that approximately \$2.2 million connected to the home's mortgage deposit originated from Mishawaka Fieldhouse project funds. They further allege that Card caused his wife to participate in transactions involving fraud-derived money; the article does not report criminal charges against her. (aol.com) Mishawaka's response The City of Mishawaka said it had only recently learned of the alleged conduct and denied prior knowledge of it. Officials maintained that the city had followed its established procedures and conducted appropriate due diligence based on the information available. The city also pledged to: • Protect public resources • Cooperate with law enforcement • Pursue legal remedies to recover any money proven to have been improperly diverted Why the story matters	IndyStar ARTICLE https://www.indystar.com/story/news/local/2026/07/17/fbi-raids-home-business-of-westfield-estate-developer/90957655007/ FBI raids home, business of Westfield developer Alexandria Burris · Indianapolis Star Federal agents raided the home and business of developer James Andrew "Andy" Card on July 16, an FBI spokesperson confirmed to IndyStar. Public Affairs Officer Chris Bavender said via email the agency conducted a "court-authorized law enforcement activity" at the two locations, but said she could not provide additional details. Card did not respond to phone calls and emails from IndyStar. A spokesperson said Card had no comment. The raid took place on the same day that the U.S. Attorney for the Northern District of Indiana submitted a filing for an asset forfeiture for a four-bedroom, six-bathroom waterfront home belonging to Card and his wife, Martha, on Marco Island, Florida, about 20 miles south of Naples. Forfeiture documents allege that Card fraudulently used money from the city-financed Mishawaka Fieldhouse project to help pay for the purchase of the \$6.6 million waterfront home. He has not been charged with a crime. Card, 62, of Westfield, is the owner of Indianapolis-based Card & Associates, which develops large-scale sports complexes and wellness centers. It also owns and operates several fieldhouses across Indiana. It developed and constructed the Pacers Athletic Center in Westfield. Court records say the scheme took place over a two-year period from October 2022 to October 2024. The city of Mishawaka hired Card's company to develop the \$38 million indoor athletic facility with hardwood courts and turf fields. Funding for the project involved tax increment financing and an economic development grant. As developer, Card signed an agreement that, with the exception of his fee, the public funding would only be used for the city project. But the forfeiture documents say Card didn't honor that agreement. Instead, he made multiple requests for disbursements to cover construction expenses and then transferred those funds into personal accounts. "The representations in the disbursements request were materially false," court documents say, "and made with intent to defraud the City of Mishawaka and others, as Card and the Business did not in fact use all the funds disbursed ... as payments or reimbursements for legitimate project costs." Card's wife, Martha, was the sole applicant for the mortgage on the Marcos Island home. To purchase it, she needed a \$1.5 million down payment and roughly \$1.2 million at close. The monies from the Mishawaka Fieldhouse Project covered those costs, according to prosecutors. Mortgage records for the home contain two letters from Card gifting the money to his wife, according to court documents. In the first letter, he gifted her \$1 million on Aug. 7, 2023 — a portion of the initial down payment. In the second, he gifted her another \$1.2 million. Both letters stipulated that no repayment was expected in return. The U.S. Attorney's Office also said he caused his wife to engage in transactions involving fraudulently-derived funds. In all, roughly \$2.2 million from the mortgage deposit was money from the Mishawaka Fieldhouse project, prosecutors said. Court documents say Card sought to conceal the transactions, but they were traceable through wire transactions. In the statement from the Executive Director of Development and Governmental Affairs Matthew Lentsch, the city said it recently became aware of the allegations and had no "knowledge of this fraudulent conduct." The city followed established policies and exercised appropriate due diligence with the information available at the time, the statement said. "The city is committed to protecting public resources and maintaining the trust of its residents," city officials said. "We will pursue every legal remedy available to recover any funds that were unlawfully used and will work with law enforcement and all appropriate parties as needed moving forward." Contact IndyStar investigative reporter Alexandria Burris at aburris@indystar.com. Follow her on X, formerly Twitter, at @allyburris. Contact IndyStar reporter Kristine Phillips at (317) 444-3026 or at kphillips@indystar.com.
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124. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Matt Lee, well-known part of Detroit music scene, dies at 68,” GPT-5.6 retrieved a *Detroit Free Press* article and output an extensive multi-section summary largely following the same structure as the original article. See Ex. B at 25.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Matt Lee, well-known part of Detroit music scene, dies at 68 In-depth summary Brian McCollum's <i>Detroit Free Press</i> obituary portrays Matt "Matty" Lee as a beloved, multitalented figure whose life was inseparable from Detroit's music and cultural communities. Lee was found dead at his Southfield condominium on June 18, 2026, after friends—concerned that he had not responded to calls or messages for two days—requested a welfare check. He was 68. At publication, the cause of death had not been announced. (aol.com) A life devoted to Detroit music Lee occupied many roles during his decades in the industry. He was a guitarist, bandleader, horn arranger, record-store manager and independent publicist. Rather than achieving fame through one high-profile position, he became important through his sustained presence across numerous corners of Detroit's cultural world. Born in Detroit in 1958, Lee graduated from Southfield High School in 1976. A self-taught guitarist who had already begun performing with local groups, he later led the Detroit rock-and-soul band the <i>Suspects</i> during the 1980s. He also worked as a horn arranger for the <i>Four Tops</i>, connecting him directly with Detroit's Motown legacy. (aol.com) After working in music merchandising in New York during the 1990s, Lee returned to metro Detroit. He became a familiar figure at <i>Off the Record</i>, a Royal Oak record store where his extensive knowledge made him a trusted resource for local music enthusiasts. Publicity as cultural advocacy Lee eventually became an independent publicist representing local bands, singer-songwriters and major events, including the <i>Detroit Jazz Festival</i>. The article emphasizes that he did not approach publicity merely as salesmanship. He treated it as a creative and personal calling, genuinely investing himself in the people and institutions he promoted. This quality helps explain his importance: Lee operated behind the scenes, helping artists receive attention, connecting journalists with stories and strengthening Detroit's cultural ecosystem. His work was rooted in enthusiasm rather than self-promotion. In later years, his client base expanded beyond music. He served as a media liaison for metro Detroit restaurants and food businesses, including <i>Dutch Girl Donuts</i>, the <i>Dakota Inn</i> Rathskeller and <i>Prince Valley Market</i>. This shift reflected the breadth of his affection for Detroit: he promoted not only its musicians but also its distinctive neighborhood institutions. (aol.com) Encyclopedic knowledge and personal warmth Friends knew Lee as "Matty" and regarded him as an unusually deep repository of musical knowledge. He could readily recall obscure musicians, credits and connections across rock, blues, jazz and R&B, with particular expertise in Detroit's musical history. His enthusiasm was not limited to local music. He was an exceptionally dedicated <i>Bruce Springsteen</i> fan who attended more than 100 concerts. Yet the article suggests that his knowledge never became cold or academic: it was animated by sociability, generosity and a desire to share music with others. His twin brother, Detroit criminal-defense attorney David Lee, describes him as someone who loved both Detroit and music profoundly and cared about virtually everyone he encountered. These recollections make the obituary as much about Lee's personality as his résumé. He is presented as gregarious, approachable and widely loved—a connective presence who made cultural communities feel more cohesive. (aol.com) The Beatles as the beginning A revealing moment comes from Lee's recollection of watching the Beatles' landmark 1964 appearance on <i>The Ed Sullivan Show</i>. Speaking to the <i>Free Press</i> during the broadcast's 50th anniversary in 2014, he remembered it as a transformative event—one that awakened his musical ambitions and seemed to accelerate broader cultural change. The anecdote gives his life story a symbolic starting point. As a child, he witnessed popular music suddenly become more urgent and exciting; he then spent the rest of his life pursuing that excitement—as a performer, record-store authority, publicist and advocate for Detroit culture.	Detroit Free Press ARTICLE https://www.freep.com/story/news/local/michigan/wayne/2026/06/18/matt-lee-detroit-music-scene-dies-68/90615448007/ Matt Lee, well-known part of Detroit music scene, dies at 68 Brian McCollum · Detroit Free Press Matt Lee, a vital and beloved fixture of the Detroit music scene, was found dead at his condominium in Southfield on Thursday, June 18. He was 68. Lee was found after friends called police for a welfare check when he had failed to return texts and phone calls for two days. The cause of death is unknown, and the Southfield Police Department declined to provide additional details Thursday evening. Lee was a gregarious, likable character who served a variety of roles during his decades in local music: rock band leader, horn arranger for the <i>Four Tops</i>, record store manager and — most notably in recent years — publicist for a host of area musicians, events and restaurants. His passing was confirmed by David Lee, his twin brother and a prominent Detroit criminal defense attorney. For Lee, promoting the culture of Detroit was a passion project. "No one loved the music more. No one loved Detroit more," said David Lee. "Everybody loved Matt, and he cared about everybody." Matty, as he was known to friends at home and across the country, was a walking fount of music knowledge, a guy who could summon obscure names, credits and connections at a moment's notice. His musical passions ran strong and his expertise was diverse — rock, blues, jazz, R&B and especially Detroit history — while his devotion to Bruce Springsteen led him to 100-plus Boss concerts over the years. Lee was born in 1958 in Detroit and graduated from Southfield High School in 1976, by which time he was performing with local groups. A self-taught guitarist, he led the Detroit rock-soul band the <i>Suspects</i> in the 1980s. After a 1990s stint in New York, where he worked in music merchandising, Lee returned home, where area music aficionados came to know him as a familiar and trusted face at the Royal Oak shop <i>Off the Record</i>. Lee then stepped into his next career chapter as an independent publicist, representing myriad local bands, singer-songwriters and events such as the <i>Detroit Jazz Festival</i>. In his work, he approached his role less as a commercial pitch man than an invested artist himself. "He marveled that he was able to make a career in music," his brother said. "He didn't know what else he could do with his life." In later years, Lee was best known as the media liaison for many metro Detroit restaurants and other food operations, with notable recent clients that included <i>Dutch Girl Donuts</i>, the <i>Dakota Inn</i> Rathskeller and <i>Prince Valley Market</i>. In 2014, while marking the 50th anniversary of the Beatles' groundbreaking appearance on "The Ed Sullivan Show," Lee recounted to the <i>Free Press</i> how that night changed his life — and sent him on a musical quest that would define the rest of his life. "Who realized how fast things would go after that — how quickly they would change and the world would change?" Lee said. "Things just sped up after that." Memorial and funeral plans are pending. Contact Detroit Free Press music writer Brian McCollum: 313-223-4450 or bmcollum@freepress.com.
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125. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Knoxville No Kings rally draws Big Ears festivalgoers to join the protest,” GPT-5.6 retrieved a *Knoxville News-Sentinel* article and output an extensive summary of the article that preserved the original article’s structure and reproduced the substantive content from the article. See Ex. B at 31.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Knoxville No Kings rally draws Big Ears festivalgoers to join the protest In-depth summary The article, written by Mariah Franklin of the Knoxville News Sentinel and published March 28, 2026, describes how Knoxville's "No Kings" demonstration intersected with the city's Big Ears music festival. Rather than remaining separate events, the protest attracted festival attendees and artists who temporarily set music aside to participate in political action. (vahoo.com) What happened Demonstrators gathered around the downtown intersection of Summit Hill Drive, Western Avenue and Broadway. They carried American flags and handmade signs, played instruments, and chanted in support of democracy and against policies of President Donald Trump's administration. The Knoxville rally belonged to the third nationwide "No Kings" day of action. Organizers said more than 3,000 events were planned across the United States. Two earlier rounds had occurred in June and October 2025. (vahoo.com) Big Ears attendees join the rally The article focuses chiefly on people who came to Knoxville for Big Ears but decided that participating in the protest was more urgent than following their festival schedules. - Kathy Hall, a Knoxville resident, planned to divide her day between the festival and the demonstration. Although she had bought her Big Ears ticket before learning about the rally, she had attended several protests since Trump began his second administration and did not want to miss this one. - Scott Mattingly, visiting from Nashville, joined a group of protesters led by Big Ears performer and musician Marc Ribot. Mattingly regarded the demonstration as more important than the festival activity he temporarily abandoned. - Joe Stahlbaum, who traveled from North Carolina, gave up the opportunity to see one of his favorite musicians, Haley Heyndericks. He framed that choice as a minor personal sacrifice compared with what he considered his civic responsibility. - Laura Jean Hocking, editor and producer of the film <i>Newport and the Great Folk Dream</i>, was attending Big Ears for a screening. She and her husband, Chris McCoy, joined the rally because of their concerns about conditions in Memphis, including the presence of military police following a National Guard deployment. Atmosphere and messages Although motivated by serious political concerns, the rally had an energetic and sometimes humorous character. Signs included pop-culture references and political jokes, while protesters used drums, horns and speakers to accompany their chants. Participant Matt Gerdeman brought a drum because he wanted to "make some noise." He said the gathering helped people recognize that they were not isolated in their concerns. Hocking similarly described the rally's collective energy as uplifting despite the depressing circumstances that brought her there. Main themes - Civic duty outweighed entertainment. The strongest recurring idea is that several participants willingly surrendered valuable festival time—and, in some cases, performances they particularly wanted to see—because they considered political participation more consequential. - Music and protest reinforced one another. Big Ears did not merely supply additional bodies. Festival artists and attendees brought music, rhythm and creative expression into the demonstration. The rally consequently became an extension of the artistic community gathered downtown. - The gathering countered political isolation. Several comments suggest that protesters feared people were being encouraged to feel powerless or alone. Public assembly gave them reassurance that others shared their concerns. - The national movement acquired a local identity. Although the rally belonged to a coordinated nationwide campaign, the article grounds it in Knoxville's distinctive cultural setting. The coinciding festival transformed the event into a meeting point between political activism, experimental art and civic life.	Knoxville News Sentinel ARTICLE https://www.knoxnews.com/story/news/local/2026/03/28/knoxville-no-kings-rally-draws-participants-from-big-ears-music-fest/89305099007/ Knoxville No Kings rally draws Big Ears festivalgoers to join the protest Mariah Franklin · Knoxville News Sentinel The No Kings rally on March 28 drew demonstrators to an already packed weekend in downtown Knoxville. People lining the intersection of Summit Hill Drive, Western Avenue and Broadway with signs were joined by participants from the weekend's Big Ears music festival happening throughout downtown. Some people joining in the No Kings rally said they'd decided to take a break from the festival to exercise their constitutional right to assembly. Rally-goers gathering waved American flags, held handmade signs and chanted slogans promoting democracy and protesting the administration of President Donald Trump. The Knoxville gathering was one in a series of national days of action that began in 2025 with two rounds of demonstrations. The March 28 events - over 3,000 across the U.S., according to organizers - marked the third No Kings day of action. The first was in June, on Trump's birthday, and the second in October. Kathy Hall, a Knoxville resident, said she'd be splitting her time between the demonstration and the festival on March 28. "I'm a bit chagrined," she said. She hadn't known about the No Kings events when she'd purchased her ticket to Big Ears, but she'd attended several demonstrations since the start of the second Trump administration, and didn't want to miss this one. Scott Mattingly, a Nashville resident, came to Knoxville for Big Ears, but he found himself among a line of protesters led by musician Marc Ribot, who's performing in the festival. "It seemed like the more important thing to do," Mattingly said of joining the demonstration. Signs on display in downtown Knoxville conveyed messages like "I'd like that TACO to go" and "Mordor has better leadership," among many other slogans. Some protesters brought their own music: speakers, along with instruments like drums and horns. Matt Gerdeman said he "came to make some noise," bringing a drum he used to accompany chants. "This makes you feel like you're not alone," he said of the demonstration. "That's what they want us to feel." Laura Jean Hocking was in town from Memphis with her husband, Chris McCoy. Hocking is screening the film "Newport and the Great Folk Dream," which she edited and produced, at Big Ears. She said she took the time to protest because conditions in Memphis have deteriorated under Trump. "It's just depressing," she said. She and McCoy referenced the National Guard's deployment in their city. "We went to the park the other day, and the military police were there," McCoy said. Pushing back is essential, Hocking said, and the energy of the protest was uplifting. Joe Stahlbaum came from North Carolina for Big Ears, but he changed his plans to see one of his favorite artists - Haley Heyndericks - in favor of going to No Kings instead. He'd been to a similar demonstration in North Carolina, he said, and when he heard about the No Kings rally, his decision was made. "I just feel like it's my civic responsibility to come to this and cut this part of the day out of the music fest," Stahlbaum said. "This is so important. That's such a small sacrifice."
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126. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary:

Sam Budnyk, Palm Beach County coaching legend, dies,” GPT-5.6 retrieved a *Palm Beach Post* article and output an extensive summary largely paraphrasing the original article. See Ex. B at 15.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Sam Budnyk, Palm Beach County coaching legend, dies In-depth summary The article, written by Alexander Peterman of The Palm Beach Post and published July 17, 2026, reports the death of Samuel F. “Sam” Budnyk, age 92. It presents Budnyk not merely as Palm Beach County’s winningest coach, but as a transformative educator and advocate who helped make high-school athletics more inclusive. (aol.com) A career spanning generations Budnyk joined Cardinal Newman High School in August 1961 after serving in the U.S. Marine Corps and graduating from Notre Dame in 1955. During 46 years at the school, he served as athletic director and coached football, softball, boys basketball, boys golf, and track and field. Across those sports, his teams accumulated: • 954 victories • A .702 winning percentage • 278 football wins • Nine football district championships • Five football conference championships • Twelve West Palm Beach city football titles He also helped more than 150 football players earn NCAA Division I scholarships, including four who subsequently played in the NFL. (aol.com) Exceptional success in multiple sports Budnyk’s achievements were not limited to football. As Cardinal Newman’s softball coach from 1976 through 1993, he recorded 437 victories and won: • Three state championships • One state runner-up finish • Eight regional titles • Fourteen district championships • Sixteen conference championships He additionally coached four conference championship teams in track and field, won 41 basketball games and two conference titles, and earned 90 victories and three conference championships in boys golf. Cardinal Newman named its softball field in his honor in 2016. (aol.com) A pioneer for racial integration The article emphasizes that Budnyk’s historical importance went beyond his record. In 1965, he hired the first African American assistant football coach at a Florida private school. Two years later, he scheduled Cardinal Newman—then an all-white school—to play John F. Kennedy High School, an all-Black school. It became Palm Beach County’s first football game between predominantly white and Black schools, occurring before court-ordered desegregation of the county’s public schools. This made athletics an early setting for meaningful racial integration in the community. (aol.com) Expanding opportunities for girls Budnyk also challenged gender barriers. In 1973, he permitted the first girl in Palm Beach County to compete in varsity track and field. The National Organization for Women recognized him for that decision. Together, these actions portray Budnyk as someone willing to use his authority to broaden participation—even when integration and gender equality remained controversial. His leadership helped normalize changes that eventually extended well beyond Cardinal Newman’s athletic programs. (aol.com) Recognition and lasting legacy Budnyk was inducted into: • The Palm Beach County Sports Hall of Fame in 1983 • The Florida High School Athletic Association Hall of Fame in 1993 • The Hammond Sports Hall of Fame in his native Indiana in 2009 The article’s central message is that Budnyk combined competitive success with moral leadership. His statistics established him as an extraordinary coach, but his efforts to dismantle racial and gender barriers made him an influential community figure. He is survived by his wife, Maurita Ross, five children, and 13 grandchildren. (aol.com)	The Palm Beach Post ARTICLE https://www.palmbeachpost.com/story/sports/high-school/football/2026/07/17/sam-budnyk-cardinal-newman-coach-dies/75076591007/ Sam Budnyk, Palm Beach County coaching legend, dies Alexander Peterman · Palm Beach Post Samuel F. “Sam” Budnyk, the winningest coach in Palm Beach County history and a pioneering advocate for racial and gender equity in high school athletics, died on Friday, July 17. He was 92. Budnyk spent 46 years shaping athletics at Cardinal Newman, serving as athletic director and coaching multiple sports while building one of the most accomplished careers in Florida high school sports history. Hired by Cardinal Newman in August 1961, the former U.S. Marine and Notre Dame graduate served as athletic director, football coach and boys basketball coach before later leading the school’s softball, golf and track and field programs. His accomplishments earned induction into the Palm Beach County Sports Hall of Fame in 1983 and the Florida High School Athletic Association Hall of Fame in 1993. More Sam Budnyk: Cardinal Newman’s state title a nod to legendary coach During his tenure, Budnyk amassed 278 victories as football coach, winning nine district championships, five conference championships and 12 West Palm Beach city titles. A 1955 graduate of Notre Dame, he sent more than 150 players to NCAA Division I programs on scholarship, including four who reached the National Football League. His success extended well beyond the football field. As softball coach from 1976 to 1993, Budnyk compiled 437 victories and led Cardinal Newman to three state championships and one state runner-up finish. His teams also won eight regional titles, 14 district championships and 16 conference crowns. In recognition of his impact on the program, Cardinal Newman dedicated its softball field in Budnyk’s honor in 2016. More than 150 former players, alumni and supporters attended the ceremony. Budnyk also guided Cardinal Newman to four conference championships in track and field, won 41 games and two conference titles as boys basketball coach, and recorded 90 victories and three conference championships in boys golf. In total, Budnyk coached his teams to 954 victories and a .702 winning percentage. While his coaching record alone secured his place among the county’s most accomplished sports figures, Budnyk’s influence stretched beyond wins and championships. In 1965, he hired the first African American assistant football coach at a private school in Florida. Two years later, he scheduled a game against John F. Kennedy High School, becoming the first coach at an all-white high school to play a football game against an all-Black school. In 1973, Budnyk was recognized by the National Organization for Women after allowing the first girl in Palm Beach County to compete in varsity track and field. Those decisions reflected a willingness to challenge long-standing barriers and expand opportunities for student-athletes at a time when such actions were far from commonplace. In 2009, Budnyk was inducted into the Hammond Sports Hall of Fame in his native Indiana. The hall praised him for having “blazed an extraordinary high school coaching and sports administrative trail in Palm Beach County, Florida.” Budnyk is survived by his wife, Maurita Ross; children Frances Farris, Rita Domenech, Samuel A. Budnyk, Mike Budnyk and Laura Arnold; and 13 grandchildren. A funeral Mass will be held at 11 a.m. Saturday, July 25, at St. Clare Catholic Church in North Palm Beach. A reception will follow in the parish hall. Alex Peterman covers high school athletics for The Palm Beach Post. He can be reached at apeterman@palmbeachpost.com.
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127. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Fawn Weaver and Uncle Nearest: How the Tennessee whiskey founder's tenure unraveled, a

timeline,” GPT-5.6 retrieved a *Tennessean* article and output an extensive multi-section summary reproducing the substantive content from the article following the same chronological timeline structure. *See* Ex. B at 35.

gpt-5.6-sol

QUERY

Please find and summarize the article with this title and give me an in-depth summary:
Fawn Weaver and Uncle Nearest: How the Tennessee whiskey founder's tenure unraveled, a timeline

In-depth summary

The article, written by Peter Burditt of *The Nashville Tennessean* and published July 15, 2026, traces the dramatic rise and unraveling of Fawn Weaver's leadership at Uncle Nearest. It presents the company's trajectory in three stages: historical mission, rapid commercial ascent, and financial crisis. (finance.yahoo.com)

1. Building a brand around Nearest Green's legacy

Weaver's journey began after she read a 2016 article about Nathan "Nearest" Green, an enslaved distiller credited with teaching Jack Daniel how to make whiskey. Fascinated by Green's overlooked role in American whiskey history, Fawn and her husband, Keith Weaver, researched his life and sought the support of his descendants.

With the family's blessing, the Weavers developed a whiskey company intended both to honor Green and to correct his omission from the historical record. They acquired property connected to the story and announced plans for the Nearest Green Distillery in Shelbyville, Tennessee. The distillery opened to visitors in 2019, selling Uncle Nearest 1856 Premium Whiskey. (finance.yahoo.com)

2. Exceptional growth from 2020 through 2024

Uncle Nearest expanded rapidly after its launch:

- Distribution grew nationwide in 2020.
- By 2021, it was described as America's best-selling Black-founded and Black-owned spirits brand.
- Weaver created a \$50 million venture fund to support minority-owned spirits businesses.
- In 2022, the company reached \$100 million in sales only three years after opening its distillery.
- By 2024, Uncle Nearest reportedly carried a \$1.1 billion valuation and was characterized as the fastest-growing whiskey brand in U.S. history.

Weaver also published *Love & Whiskey*, recounting her discovery of Green's story and the creation of the company. The book became a *USA Today* and *New York Times* bestseller. During this period, Weaver was not merely the chief executive; she was the public identity, historian and chief storyteller behind the brand. (finance.yahoo.com)

3. The financial and legal crisis

The turning point came in August 2025, when lender Farm Credit Mid-America sued Uncle Nearest entities, alleging defaults on more than \$100 million in loans. The lender sought a court-appointed receiver—an outside party empowered to take control of a distressed company and preserve its assets.

A court granted that request, and receiver Phillip G. Young assumed operational control in September 2025. This effectively displaced the Weavers' authority, even though they remained associated with the company.

After examining the finances, Young reported serious problems, including unpaid taxes, undisclosed debts and broader operational difficulties. At an emergency hearing in Knoxville in February 2026, he concluded that selling the business was the only viable means of preserving value for creditors and other stakeholders. These findings sharply contrasted with Uncle Nearest's recent image as a billion-dollar success. (finance.yahoo.com)

4. Weaver's attempts to resist the receivership

Weaver attempted to place the company into bankruptcy in March 2026, but the effort was rejected because the receiver—not Weaver—then controlled the relevant corporate entities.

On March 13, she also brought a defamation lawsuit against Farm Credit Mid-America in New York. This indicated that Weaver disputed at least parts of the lender's portrayal of the company and was pursuing legal avenues to challenge the narrative surrounding its collapse.

The article nevertheless focuses primarily on the receiver's account and the chronological sequence of court actions. It does not attempt a complete adjudication of the competing allegations.

5. Proposed sale and external investigations

In May 2026, an unidentified Black-owned investment firm signed a nonbinding letter of intent to purchase Uncle Nearest's assets. According to the article, the prospective buyer said it intended to retain employees and preserve the brand's connection to Nearest Green.

Because the letter was nonbinding, however, it represented only an initial step rather than a completed rescue. A sale would transfer the brand and assets while potentially severing them

The Tennessean

ARTICLE

<https://www.tennessean.com/story/money/business/2026/07/15/fawn-weaver-uncle-nearest-rise-firing-timeline/90930190007/>

Fawn Weaver and Uncle Nearest: How the Tennessee whiskey founder's tenure unraveled, a timeline

Peter Burditt · Nashville Tennessean

Uncle Nearest founder Fawn Weaver was recently terminated as CEO of the Tennessee whiskey brand after being at the helm since its founding in 2019.

Weaver's firing comes amid Uncle Nearest's legal battle with Farm Credit Mid-America, which is suing Uncle Nearest for allegedly defaulting on more than \$100 million in loans. The Tennessee whiskey company has been in receivership since August 2025.

The court-appointed receiver fired Weaver and her husband and co-founder, Keith Weaver, on June 1. The firings were disclosed on July 10 in a federal court filing obtained by The Tennessean.

"While the decision was not made lightly, it has resulted in significantly less confusion among employees and vendors, and has made business operation significantly smoother," the filing said.

Weaver's termination marks the end of her eight-year tenure as CEO of Uncle Nearest. During those years, Weaver grew the humble whiskey startup into a ubiquitous liquor brand worth \$1.1 billion at its peak.

Here is a timeline of how Fawn Weaver's journey with Uncle Nearest began and how it ended in her exit from the distillery.

2016 to 2019: Fawn Weaver discovers the story of Nathan 'Nearest' Green and embarks on entrepreneurial journey

Weaver learned of the company's namesake, Nathan "Nearest" Green, an enslaved man who taught Jack Daniels how to distill whiskey, from a 2016 article in Singapore's version of the *New York Times* called, "Jack Daniel's Embraces a Hidden Ingredient: Help From a Slave."

After discovering Green's contribution to the famed Tennessee whiskey brand, Weaver and her husband became transfixed. Once Weaver got the blessing from Green's descendants to honor his name and story, the duo announced plans for the Nearest Green Distillery in Shelbyville, Tenn, marking the public launch of the project.

Two years later, in 2019, Uncle Nearest was born, as the Weavers opened the doors of the Shelbyville distillery to the public, selling its flagship Uncle Nearest 1856 Premium Whiskey.

2020 to 2024: Fawn Weaver grows Uncle Nearest into billion-dollar Whiskey company

In 2020, the company continued its rapid expansion, growing distribution nationwide. By 2021, Uncle Nearest had become the best-selling Black-founded and Black-owned spirits brand in the United States. In light of the company's success, Weaver also launched a \$50 million Uncle Nearest Venture fund to support minority-owned spirits brand that same year.

In 2022, the Tennessee whiskey company was named to Food & Wine's inaugural Drinks Innovators of the Year list. More notably, Uncle Nearest reached \$100 million in sales just three years after opening its doors.

Two years later, Uncle Nearest was valued at \$1.1 billion, making it the fastest growing whiskey brand in U.S. history. That year, Weaver released "Love & Whiskey" a USA TODAY and *New York Times* bestseller chronicling the discovery of Green's story and the rise of the company.

2025 to present: Uncle Nearest enters legal battle with Kentucky lender

In August 2025, Kentucky credit union, Farm Credit Mid-American sued Uncle Nearest for allegedly defaulting on more than \$100 million in loans. In turn, the lender asked a federal court to appoint a receiver to take control of the company. Farm Credit had its wish granted, as receiver Phillip G. Young took over operations in September 2025.

After Young began reviewing Uncle Nearest's finances, there was an emergency hearing in Knoxville in February 2026 where he divulged the significant operational and financial issues present, including unpaid taxes and previously undisclosed debts. Consequently, Young declared that a sale would be the "the only viable option" to maximize the company's value for stakeholders and creditors.

In March, Weaver attempted to file for bankruptcy but was denied given that control of the company had been granted to Young. She also filed a defamation lawsuit against the Kentucky lender in New York on March 13.

128. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Judge finds woman defended herself in killing ex during breakup dispute,” GPT-5.6 retrieved an *Enquirer* article and output an extensive multi-section summary following the same structural organization as the original article. See Ex. B at 21.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Judge finds woman defended herself in killing ex during breakup dispute In-depth summary The article reports that Hamilton County Common Pleas Judge Christopher McDowell acquitted Marshee Luther, 26, of murder and felonious assault on May 8, 2026, concluding that she acted in self-defense when she fatally shot her former girlfriend, Taralynn Bowers, 29, in Millvale, Ohio. The ruling followed a two-day bench trial. (aol.com) What happened Luther and Bowers began dating in December 2024 but ended their relationship in March 2025. On August 31, 2025, Bowers went to another woman's home for a conversation concerning the breakup. Luther also arrived, and the discussion became emotional before the two initially left separately. Less than an hour later, Bowers returned uninvited and called for Luther to come outside and fight. According to Luther, she refused and remained seated inside. Bowers then entered the residence, approached her, and reached into a cross-body purse. Luther interpreted this as an attempt to retrieve a weapon and fired one round from a 9mm handgun, striking Bowers in the head and killing her. Police found a folding pocketknife—but no gun—in Bowers' purse. Luther immediately called 911 and was subsequently taken into custody. (aol.com) The prosecution's case Prosecutors argued that Luther used deadly force without sufficient evidence that she faced an imminent lethal threat. She had not seen a weapon in Bowers' hand and did not know what was in the purse when she fired. Assistant Prosecutor Joe Otero emphasized that the knife's discovery afterward could not retroactively justify the shooting. The central legal question was whether Luther's belief that she faced serious harm was reasonable at the moment she pulled the trigger, not whether investigators later discovered something potentially dangerous. Prosecutors also challenged Luther's account of sustained fear by noting that she: • Had not reported several alleged threats and assaults. • Continued communicating with Bowers after their breakup. • Did not actually see Bowers holding a gun or knife before shooting. Their position was essentially that a troubled history and an ambiguous movement toward a purse did not provide reasonable grounds for lethal force. The defense's case Defense attorney Brandon Fox framed the killing as the culmination of an abusive relationship rather than an isolated breakup argument. He portrayed Luther as a domestic-violence survivor who reasonably believed Bowers was reaching for a weapon. Luther told detectives that Bowers had previously threatened her with a gun. In another alleged incident, Bowers cut Luther's wrist with a butcher knife after Luther said she wanted to end the relationship. Luther said these experiences caused her to begin carrying a gun for protection. Court records also showed that Bowers had been charged with burglary in April 2025 after allegedly entering Luther's home through a window and stealing two doorbell cameras. That case was later dropped when Luther did not continue cooperating with the prosecution. The defense argued that victims' failure to report abuse—or their continued contact with an abusive former partner—does not necessarily mean that the abuse did not occur or that they felt safe. Given the previous alleged incidents, Fox maintained that Luther did not have to wait until she saw a weapon before protecting herself. Evidence strengthening the defense Several details supported Luther's perception of immediate danger: • Bowers allegedly returned uninvited and demanded a fight. • She entered the residence and moved toward Luther. • She reached into a purse that actually contained a knife. • Luther said the previous time Bowers made a similar reaching movement, she had produced a gun. • Investigators learned that, while returning to the residence, Bowers sent messages saying, "She's gonna die." Luther did not know about those messages when she fired, so they could not directly explain her state of mind, but they supported the defense's portrayal of Bowers as the aggressor. • Detective Todd Greene acknowledged at trial that Bowers was the initial aggressor.	Cincinnati Enquirer ARTICLE https://www.cincinnati.com/story/news/2026/05/09/ohio-woman-shot-killed-ex-girlfriend-judge-says-it-was-self-defense/90001980007/ Judge finds woman defended herself in killing ex during breakup dispute Quinlan Bentley • Cincinnati Enquirer A judge found that Marshee Luther acted in self-defense when she shot and killed her ex-girlfriend in Millvale last year. Hamilton County Common Pleas Judge Christopher McDowell acquitted 26-year-old Luther of murder and felonious assault charges on May 8 at the end of a two-day bench trial. Luther killed her former girlfriend, 29-year-old Taralynn Bowers, on Aug. 31 during a confrontation that stemmed from the couple's ended relationship months earlier. Prosecutors said that Luther fired a single, fatal round from a 9mm handgun that struck Bowers in the head, without knowing whether her life was really in danger or if the other woman was armed with a deadly weapon. They argued she didn't have reasonable grounds to use deadly force. However, Luther's attorney said that the episode was the last in a series of threats and violence, describing his client as a survivor of domestic abuse. "It was Marshee, or it was Taralynn that day," Brandon Fox, the attorney, said in court. "One of them was going to live and then one of them was going to be here at the defense table." Dispute over relationship's demise leads to deadly shooting The couple started dating in December 2024 and broke up a few months later in March 2025. On the day of the shooting, Bowers was invited to another woman's home to talk about the breakup, Assistant Hamilton County Prosecutor Joe Otero said in court. The situation grew emotional after Luther arrived, he said, although it was calm by the time both women went their separate ways. Bowers left the home but returned uninvited less than an hour later, now calling for Luther to come outside to fight, according to trial testimony. Luther told police she didn't want to fight and was sitting on the couch when Bowers came inside toward her and reached into a cross-body purse. She perceived the movement as a threat, stood up and pulled the trigger. The only item found in Bowers' purse was a foldable pocket knife. "The knife is a hindsight fact," Otero said in court. "But we're not dealing with hindsight ... we're dealing with what came about in that moment." After the shooting, Luther called 911 and was later taken into police custody. She told investigators that the last time she saw Bowers reach for something, it was a gun. A detective's pros and cons list Detective Todd Greene, one of the investigators assigned to the case, said in court that he thought deeply about charging Luther in connection with the killing. Greene even wrote out a pros and cons list, he said, outlining Bowers' actions leading up to the shooting and whether those supported a case against Luther. The cons list contained only one piece of evidence: Bowers reaching into the purse with a knife inside. In hindsight, Greene acknowledged on the witness stand, the list should've been longer. He also agreed that Bowers was the initial aggressor. Woman charged in shooting describes toxic relationship During an interview with Cincinnati police homicide detectives, Luther described the relationship with Bowers as toxic. Court records show that Bowers was charged with burglary in April 2025, accused of breaking into Luther's home through a window and stealing two doorbell cameras. The charge was later dropped after Luther failed to follow through with the prosecution, according to testimony. Fox said there were previous unreported instances in which Bowers threatened Luther with a gun and, in one alleged incident on the day of their breakup, slashed the woman's wrist with a butcher's knife. "She cut me because I told her I didn't want to be with her," Luther said in the interview. She added that she started carrying a gun because she felt threatened by Bowers.
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129. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: After devastating fire, Hispanic meat market reopens in Des Moines,” GPT-5.6 retrieved a *Des Moines Register* article and output a summary reproducing the substantive content of the article and largely following the article’s narrative structure. See Ex. B at 8.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: After devastating fire, Hispanic meat market reopens in Des Moines	The Des Moines Register ARTICLE https://www.desmoinesregister.com/story/grocery/stores/2026/07/18/cerro-grande-meat-market-hubbell-avenue-des-moines-ottumwa-fire/85630166007/
In-depth summary The article, published by the <i>Des Moines Register</i> on July 18, 2026, chronicles how Cerro Grande Meat Market rebuilt its business and relocated to Des Moines after a catastrophic fire destroyed its longtime Ottumwa location. (not.com) Destruction of a family business An electrical fire on July 6, 2025, devastated the market that owner Jose Lopez and his family had spent 15 years building. The blaze left a 30-by-60-foot opening extending from the basement through the roof. Because the property was underinsured, rebuilding there was financially impractical. The loss was personal as well as commercial. Lopez said he lost virtually everything—including his clothing and bed—while also caring for a newborn. The disaster therefore threatened his family's home, livelihood, and the business into which they had invested years of labor. A difficult move to Des Moines The family's path forward emerged when someone offered them favorable terms on a building at 2517 Hubbell Avenue, on Des Moines' east side. Cerro Grande was scheduled to open there on July 19, 2026, approximately one year after the fire. Relocation was not an easy or purely business-driven decision. The Lopez family had deep roots in Ottumwa and had watched customers form families and move through important life events. Lopez described leaving as painful because the market's relationship with its clientele had grown into something resembling an extended community. The former Ottumwa property was purchased by La Hacienda Meat Market and Grocery, which began remodeling it. Thus, although Cerro Grande moved away, the location was expected to continue serving as a food market. Cerro Grande's community role The article emphasizes that Cerro Grande was more than a place to purchase meat. The Lopez family regularly supported local organizations and entrepreneurs. Their contributions included: - Donating thousands of pounds of meat to fundraisers - Selling tacos during Ottumwa's Balloon Races and returning the proceeds to the organization - Working with the Kiwanis on community projects - Helping a CrossFit trainer launch a gym by raising money through chicken-box sales After the fire, Ottumwa residents offered such extensive help that the family had to turn away some people who wanted to assist with cleanup. For Lopez, that response revealed how significant the market had become to the city. A distinctive approach to butchery Cerro Grande specializes in meat cuts, prepared foods, and sausages associated with Hispanic and other immigrant cuisines. Lopez describes his craft as closer to a chef's work than conventional meat processing. The store reportedly offers 42 varieties of sausage, including unusual creations such as a cordial cherry-and-chocolate flavor. Lopez developed recipes by consulting chefs and butchers internationally through video calls. The article notes that culinary professionals often guard their recipes closely, making their willingness to share knowledge particularly meaningful. His motivation is not simply experimentation. Lopez recognizes that immigrants may go years without tasting foods from their countries of origin. He therefore researches difficult-to-find recipes and tries to keep prices accessible. Examples include: - Learning to make Guatemalan sausage from scratch - Spending months tracking down a recipe for longaniza, a sausage with Spanish and Filipino traditions - Offering tamales, specialized cuts, and prepared meals connected to customers' cultural backgrounds A multigenerational tradition Lopez represents the fourth generation of his family involved in butchery. His father opened a Hispanic market in Marshalltown during the 1990s before moving to Ottumwa. Lopez later saw an opportunity to transform the family grocery into a specialized meat market. Over five years, he expanded its inventory and promoted the business through social media. According to Lopez, customers traveled from as far away as Alaska and Missouri to try its products. His cooking also received local recognition: in 2022, he won first place in the	After devastating fire, Hispanic meat market reopens in Des Moines Lucia Cheng · Des Moines Register "I lost everything. My clothes, my bed, everything. I had nothing," said Jose Lopez, owner of Cerro Grande Meat Market. At the time, he was also caring for a newborn. In just a few hours last July, an unexpected electrical fire turned the Lopez family's 15 years of work on their Hispanic market in Ottumwa into charred ash. The July 6, 2025, fire left the building, which was underinsured, with a 30- by 60-foot hole stretching from the basement to the roof. There was no easy way to rebuild, Lopez said. After someone offered a generous deal for a building in Des Moines, the family made the hard decision to uproot from Ottumwa. Cerro Grande Meat Market is expected to open on Sunday, July 19, at 2517 Hubbell Ave. on Des Moines' east side. Its old location was bought by La Hacienda Meat Market and Grocery, which is making steady progress with remodeling the building. Meat market owner says it hurts to leave Ottumwa behind after fire The market's story isn't just about the 42 kinds of sausages you can find in the store. Nor is it just about its specialty meat cuts for immigrants craving a taste of home. Its story is also about how dedicated the Lopez family is to giving back to their community. In Ottumwa, they donated thousands of pounds of meat to local fundraisers and helped other local businesses get on their feet. "It does hurt in a way for us to leave because they've seen us grow. They've seen my niece grow," Lopez said. "I've seen them grow, I've seen people marry, get engaged. I've seen customers come to us for support." Cerro Grande Meat Market made tacos for Ottumwa's Balloon Races, with proceeds going back to the organization. It did fundraisers with the Kiwanis, a nonprofit that focuses on community service. Lopez helped a CrossFit trainer start his own gym after he saw his business proposal — by selling boxes of chicken. "When the fire happened, we realized how much of an impact we had in the community because the community showed up for us," Lopez said. His family had to turn away people who wanted to help clean out the remains of their market. Cerro Grande features fourth-generation butcher Aside from large chains such as Hy-Vee and Fareway, Lopez said there isn't another store quite like Cerro Grande. He's trying to bring European-style meat markets to Iowa. His dad started a Hispanic market in Marshalltown in the 1990s before moving to Ottumwa. Lopez saw an opportunity to convert the store into a meat market. Over five years, Lopez added new inventory to the store and beefed up advertising on social media. "Since I'm very passionate, I wanna see people try my products because the way I think of my way of butchery is more of like a chef," Lopez said. He's done many video calls with chefs and butchers around the world, who were kind enough to share their recipes. That's a big deal in the culinary world. Their conversations resulted in some interesting sausage flavors at Cerro Grande, like its cordial cherry-chocolate mixture. Word of mouth spread, and Lopez said people from all over the United States, from Alaska to Missouri, have traveled to Iowa specifically to try his food. Ottumwa seems to think he has talent — Lopez won first place in the symphony orchestra's 25 Men Who Can Cook contest in 2022, as well as second place in the People's Choice Awards during the same contest. Lopez said he tries not to raise prices on his meat just for a better profit margin. He knows how much it means to people when they're trying to make meals from their home countries, foods that they haven't had in years. That's why he learned how to make Guatemalan sausage from scratch. And it's also why he tracked down a recipe for longaniza, a Spanish-Filipino sausage that took him months to find.

130. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, "Please find and summarize the article with this title and give me an in-depth summary: Sullivan University has seen massive changes. Here's a rundown," GPT-5.6 retrieved a *Courier-*

Journal article and reproduced an extensive summary mirroring the article's section-by-section structure and reproducing the substantive content from the original article. See Ex. B at 4.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Sullivan University has seen massive changes. Here's a rundown In-depth summary The article, published by the <i>Louisville Courier Journal</i> on August 12, 2025, describes a period of substantial upheaval at Sullivan University following co-founder Alva Ray Sullivan's death in 2022. Although the private, family-controlled university continued to present itself as financially stable, leadership departures, layoffs, property sales and campus closures created uncertainty among employees. (yahoo.com) Leadership instability President Tim Swenson resigned on August 6, 2025, two days after being placed on administrative leave and less than three years after taking office. The university did not publicly explain either decision. Chancellor and CEO Glenn Sullivan, the founder's son, became interim president. The governing board said it would launch a nationwide presidential search in September. The article notes the institution's unusually strong family control: Glenn Sullivan sits on the seven-member board alongside his sister Lisa Zaring and their mother, Patricia Sullivan. Swenson's predecessor, Jay Marr, had moved into a vice-chancellor position before joining Sullivan's accreditor, the Southern Association of Colleges and Schools Commission on Colleges. Executive turnover Several important administrators also left: - Enrollment executive Nina Martinez departed after more than 25 years and joined Spalding University. - CFO Bethany Dupree also moved to Spalding, after saying she had improved Sullivan's cash flow substantially. - Marketing manager Emily Kunkel left after overseeing the "School of Doing" advertising campaign. - Sullivan advertised openings for CFO, marketing manager and quality-enhancement-plan director. The last position was particularly significant because it involved maintaining compliance with SACSCOC accreditation requirements. The turnover occurred around Sullivan's major accreditation review—its first since 2015. Layoffs and consolidation Sullivan conducted two rounds of workforce reductions in 2025: - In May, it eliminated 10 positions across several departments. - In July, it announced the elimination of 21 Louisville positions, seven of which were already vacant. Swenson initially described some restructuring as an attempt to eliminate duplication between the Louisville and Lexington campuses, consolidating financial-aid and student-service functions in Louisville. However, the second layoff announcement acknowledged broader pressures facing higher education and said earlier cost-cutting measures had not been sufficient. After the reductions, Sullivan reportedly employed approximately 440 people systemwide. Shrinking physical footprint The university had already reduced its operations by: - Closing instructional sites at Fort Knox and Louisa. - Closing the College of Technology and Design. - Selling its Atkinson Square property to Jefferson County Public Schools in 2021. It also listed Gardiner Point, its only residence hall, for \$9.95 million. The 257-room property would end Sullivan's on-campus housing model in Louisville. Swenson said the dorm had become underused after the pandemic. He also argued that most residents were culinary students who would benefit from ordinary apartments with kitchens, which the residence-hall rooms lacked. Financial and governance concerns The article does not claim that Sullivan is insolvent, but the combination of layoffs, consolidation, asset sales, vacancies and executive departures raises questions about its financial condition and long-term direction. Its finances have also surfaced in litigation involving members of the Sullivan family. Divorce and inheritance-related disputes reportedly provide rare outside glimpses into ownership.	The Courier-Journal ARTICLE https://www.courier-journal.com/story/news/education/2025/08/12/sullivan-university-louisville-layoffs-dorm-sale-president-search/85546891007/ Sullivan University has seen massive changes. Here's a rundown Stephanie Kuzydym · Louisville Courier Journal Sullivan University ran a series of billboards this spring around Louisville and along Interstate 65, marketing the institution as the "School of Doing." The campaign ran partly to coincide with the approaching end of the school year. But the nods to the school's nursing and culinary programs were also on display for a visit from the organization that oversees Sullivan's accreditation: the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) or SACS, for short. The school's last review by the accrediting body was a decade prior, in 2015. In the 10 years since, the school lost its co-founder and downsized its offerings, all while maintaining publicly its financial stability. But in the time since founder Alva Ray Sullivan's 2022 death, there's been a lot of change at the regional university, causing uncertainty among faculty and staff, including last fall, when LEO Weekly published a story that named Sullivan University the worst place to work in Louisville among reviews on Glassdoor — a job search website where current and former employees can anonymously review their company. From the planned sale of the institution's only residence hall to its president stepping down, here's a rundown of recent changes: Sullivan search for new president begins On August 6, Tim Swenson resigned as president from Sullivan University, two days after he was placed on administrative leave and less than three years after he was named to the position. An email to staff sent by Jill Long, the special assistant to Sullivan University System's chancellor and CEO Glenn Sullivan and sent on behalf of Jeff Biggs, who serves as chairman of Sullivan's board of directors, did not give a reason for Swenson stepping down. "It is also important to recognize his contributions and efforts in working through our recent SACSCOC accreditation process," the email said. Glenn Sullivan, the chancellor, was named interim president. The next day the board of directors announced in an email it would begin a nationwide search for a new president in mid-to-late September. The seven-person board of directors, which already included Glenn Sullivan, the now-interim president, includes other Sullivans: Lisa Zaring, Glenn's sister and daughter of founder Alva Ray, along with Patricia Sullivan, Alva Ray's ex wife. Prior to Swenson, Jay Marr served as Sullivan University's president. When Swenson was announced as the new president in September 2022, Marr was named vice chancellor. Three months later, he became vice president of the SACSCOC, according to his LinkedIn. Marr did not respond to a request for comment from The Courier Journal. Shakeup among university executives In the years since Marr left, there were some major moves in Sullivan University's executive positions, especially in the months prior to Swenson being placed on leave. A March 31 email, obtained by The Courier Journal and sent to staff from then-president Swenson, announced Nina Martinez, the senior vice president of enrollment management, would leave the university after more than 25 years with the institution. Martinez is now the vice president of admissions and student experience at Spalding University. She was the first of two executives to move from Sullivan to Spalding. The second was Bethany Dupree, now the chief financial officer at Spalding. Dupree was named CFO of Sullivan in August 2023, according to Sullivan's hiring announcement from Swenson and obtained by The Courier Journal. Dupree served as the CFO for nearly two years, "transforming financial operations, delivering an 88% improvement in cash flow versus the prior 10-year period," she said on her LinkedIn profile. Her job was posted on Sullivan University's website on August 5, along with the role of marketing manager.
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131. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Beloved cougar dies at Shy Wolf Sanctuary in Naples,” GPT-5.6 retrieved a *Naples Daily News* article and output an extensive multi-section summary following the same structural organization as the original article, reproducing the article’s key facts. See Ex. B at 12.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Beloved cougar dies at Shy Wolf Sanctuary in Naples In-depth summary The article, published by Vanessa Norris of the Fort Myers News-Press and Naples Daily News on June 25, 2026, reports the death of Cimarron, a 19-year-old cougar at Shy Wolf Sanctuary in Naples, Florida. Known affectionately as “Cimmy,” he died peacefully of natural causes on June 20, surrounded by his caregivers. (aol.com) His life at the sanctuary Cimarron was born and bred in captivity. He arrived at Shy Wolf Sanctuary when he was approximately three years old and lived there for the remaining 16 years of his life. His age was notable: wild cougars generally live much shorter lives, while animals receiving managed care can occasionally survive beyond 20 years. The article depicts his longevity as evidence of both his resilience and the sustained care he received. Staff had noticed recent health changes and understood that his death was approaching, but sanctuary representatives said his loss still created an enormous emotional void. A distinctive personality Cimarron was remembered not simply as an exhibit but as an individual with clear preferences and a forceful personality. He reportedly: - Loved fresh catnip. - Was fascinated by the scent of Christmas trees. - Formed especially strong attachments to several male caregivers. - Could be selective and temperamental in his relationships. - Frequently surprised staff by recovering after periods when he appeared to be declining. These details give the article the character of an obituary. Its focus is less on the biological fact of the cougar’s death than on the relationships he formed with the people who cared for him. Educational importance Cimarron served as an animal ambassador, helping thousands of visitors learn about cougars, wildlife conservation and the dangers facing Florida panthers. His presence enabled the sanctuary to turn abstract environmental issues into a direct encounter with a living animal. He also participated indirectly in the sanctuary’s broader community mission. Earlier sanctuary materials describe visitors—including vulnerable and traumatized young people—meeting or spending time near his enclosure as part of educational and therapeutic programming. (archive.naplesnews.com) Continuing contribution to science A major point in the article is that Cimarron’s conservation role did not end with his death. Shy Wolf Sanctuary arranged to donate tissue samples to the Florida Fish and Wildlife Conservation Commission’s Panther Team for research into feline leukomyelopathy, a neurological disorder affecting Florida panthers and bobcats. His body was transported to Naples Zoo, where an FWC veterinarian was expected to conduct a postmortem examination and collect the samples. His remains were then to be cremated through Faithful Companions. (aol.com) The donation creates a fitting conclusion to his life: an animal who educated people about wild cats while alive may now help scientists better understand a disease threatening related native species.	Naples Daily News ARTICLE https://www.naplesnews.com/story/news/local/2026/06/25/beloved-cougar-dies-at-19-at-shy-wolf-sanctuary-in-naples/90695346007/ Beloved cougar dies at Shy Wolf Sanctuary in Naples Vanessa Norris · Fort Myers News-Press & Naples Daily News Cimarron, a beloved cougar at the Shy Wolf Sanctuary in Naples, died June 20 at 19 years old. A news release by the Shy Wolf Sanctuary revealed Cimarron, nicknamed “Cimmy” for short, died of natural causes. Cougars typically live eight to 10 years in the wild, but can live over 20 years in captivity, according to Big Cat Rescue, a nonprofit conservationist organization. Cimarron was bred and born in captivity. At 3 years old, he was transferred to Shy Wolf Sanctuary, a nonprofit animal rescue, where he spent his remaining 16 years. “His loss leaves an enormous hole in the hearts of everyone who knew and loved him,” Shane Biltz, the Shy Wolf Sanctuary president, said in the release. “The sanctuary feels a little quieter without him.” Cimarron was full of personality and “had a particular fondness for the men in his life,” growing strong connections with his caretakers, the release said. He loved fresh catnip and the smell of Christmas trees during the holidays. During his time at Shy Wolf Sanctuary, Cimarron helped educate visitors about cougars and threats to Florida panthers. Even after his death, Cimarron will contribute to research and conservation efforts. The sanctuary partnered with the Florida Fish and Wildlife Conservation Commission to donate Cimarron’s tissue samples to research into feline leukomyelopathy, a neurological disorder affecting Florida panthers and bobcats. Cimarron’s body was transported to Naples Zoo at Caribbean Gardens, where a Florida Fish and Wildlife Conservation Commission veterinarian will collect tissue samples for the research. His remains will be cremated by Faithful Companions. “Cimmy touched countless lives during his time with us,” Liz Harmon, the sanctuary’s animal care director, said in the release. “Thank you for the memories, the laughs, the attitude and the privilege of caring for you. You were deeply loved, and you will be deeply missed.” Reach reporter Vanessa Norris by emailing vnorris@news-press.com Do you have an opinion about this topic? Send us a letter to the editor or guest column at mailbag@news-press.com or letters@naplesnews.com. Please support local community journalism and stay informed about Southwest Florida news by subscribing to The News-Press and Naples Daily News; download the free News-Press or Naples Daily News app, and sign up for daily briefing email newsletter, food & dining and growth & development newsletters here and here.
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132. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Parade of great white sharks continues as Cross reaches New Jersey,” GPT-5.6 retrieved an *Asbury*

Park Press article and output an extensive multi-section summary following the original article's narrative structure, reproducing the exact details from the original article. See Ex. B at 2.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Parade of great white sharks continues as Cross reaches New Jersey	Asbury Park Press ARTICLE https://www.app.com/story/news/local/animals/2026/05/26/ocearch-great-white-sharks-new-jersey-cross-nori-quint-ripple/90194152007/
In-depth summary "Parade of great white sharks continues as Cross reaches New Jersey," by Dan Radel of the <i>Asbury Park Press</i>, was published May 26, 2026. It reports that another satellite-tagged great white shark has passed the Jersey Shore during the species' annual northward migration. (aol.com) Cross's journey Cross is a juvenile male great white measuring nearly 10 feet and weighing approximately 400 pounds. His satellite tag transmitted a location east of Atlantic City around sunset on May 25. Researchers tagged Cross near Nova Scotia on October 3, 2025. He subsequently traveled south, spending late fall and winter near the Carolinas and reaching as far south as waters southeast of Savannah, Georgia. In April, he reversed direction and began swimming north. OCEARCH named him after Cross Island in Nova Scotia's Lunenburg Bay. According to local folklore, early French settlers erected a cross there that served both as a religious symbol and a navigational landmark. Part of a broader migration The article emphasizes that Cross's appearance is not an isolated or especially unusual event. Western North Atlantic white sharks generally move between: - Northern summer feeding grounds around New England and Atlantic Canada, where seals provide abundant prey. - Southern winter habitats along the southeastern United States and, for some sharks, the Gulf of Mexico. Recent research based on 92 tagged sharks confirms that the Gulf and Straits of Florida are regular winter habitats—not merely occasional destinations—for this population. (ocearch.org) Cross was the third OCEARCH-tagged great white detected near New Jersey that spring, following Nori and Quint. By the time the article appeared: - Nori had reached Nova Scotia and transmitted near Mahone Bay. - Quint had last transmitted near Rhode Island Sound. - Ripple, an 11-foot-6-inch, 778-pound male, had entered Virginia waters and appeared likely to follow Cross toward New Jersey. These movements illustrate a coastal migration corridor connecting the southeastern United States, the New York-New Jersey region and Atlantic Canada. OCEARCH identifies the New York-New Jersey Bight as an important nursery area for this shark population. (ocearch.org) How the tracking works Cross carries a satellite-linked SPOT tag on his dorsal fin. A location "ping" occurs when the fin—and therefore the tag—breaks the surface long enough to communicate with a satellite. Consequently, a ping marks a confirmed surface location, not the animal's uninterrupted or exact real-time course. OCEARCH has spent more than a decade combining these movement records with biological samples collected during tagging. Its western North Atlantic database includes more than 100 tagged white sharks. The goal is to identify migration corridors and essential habitats while improving knowledge of shark development, behavior and reproduction. (ocearch.org) The loggerhead-turtle sidebar The article also discusses Wassaw Will, a female loggerhead turtle tracked through the same platform. She had returned to Delaware Bay after swimming south toward Wilmington, North Carolina, during the colder part of the year. First tagged in 2010, Wassaw Will has repeatedly been encountered by researchers. Records cited by OCEARCH credit her with: 31 nests 2,845 eggs 2,184 confirmed hatchlings - Usually five or six nests per nesting year Her history demonstrates that long-term tagging can reveal repeated habitat use and reproductive activity across many years—not only short-term animal movements. (ocearch.org)	Parade of great white sharks continues as Cross reaches New Jersey Dan Radel - Asbury Park Press The great white sharks keep coming up the coast to swim off the Jersey Shore. The latest shark to "ping" off the New Jersey coast is Cross, who's just a juvenile male great white shark that weighs around 400 pounds, give or take, and is nearly 10 feet long. Cross's last location was east of Atlantic City, where satellite picked up the signal from the SPOT tag on his dorsal fin Monday evening around sunset. The great whites are on their spring migration from wintering grounds off the southeastern coastal states to the rocky shorelines of New England and Canada where they'll fatten up on seals all summer. Cross is tied to a little bit of folklore, according to OCEARCH, the non-profit research group that captured the apex predator on Oct. 3, 2025, when he was off Nova Scotia. OCEARCH named him after Cross Island in Lunenburg Bay. Folklore tells that early French settlers erected a cross on the island where a lighthouse now stands, serving as both a devotional symbol and a navigational aid for sailors. After being tagged, Cross swam south and spent the late fall and winter off the coast of the Carolinas. His furthest point was southeast of Savannah, Georgia. In April he headed north. It's a similar route taken by great white sharks off the eastern seaboard as evidenced by the more than 100 sharks OCEARCH is tracking. For more than a dozen years, OCEARCH has been collecting biological data at capture points and using satellite tags to gather migration routes from the sharks to better understand the life cycle of one of the ocean's apex predators. With the data, OCEARCH can map essential shark habitats, and inform future conservation efforts to help protect the species. More: Jersey Shore boardwalk prizes you can win this summer Cross is the third OCEARCH-tagged great white shark to ping off the New Jersey coast this spring, following on the heels of Nori and Quint. Nori has made it back to Nova Scotia and pinged on Monday near Mahone Bay where she was tagged last October. Quint last pinged in near the Rhode Island Sound about a week ago. There are several more sharks on the tail of Cross, according to OCEARCH's global shark tracker, which maps the location of the sharks when they "ping," so called when the satellite picks up the signal. Ripple, a male who weighs in at 778 pounds and is 11 feet, 6 inches long, has just swam into Virginia waters, and could be the next to reach New Jersey. Cross isn't the only tagged marine animal that the tide brought in. Wassaw Will, a female loggerhead turtle has returned to Delaware Bay. She has been tagged more than once. The first time was in 2010. The latest was last year when she was briefly captured in the Wassaw National Wildlife Refuge in Georgia almost one year ago to the day. More: Two in critical condition after Barnegat Bay boat crash She was tagged by the Archie Carr Center for Sea Turtle Research in partnership with the Caretta Research Project. OCEARCH monitors her movement with their shark tracker app. She typically lays five or six nests a year, resulting in 31 total nests with 2845 eggs, 2184 of which have hatched. At least three documented nests have been lost to storms or tidal surge, according to researchers. Her satellite tag shows she spent last summer and some of the fall in Delaware Bay, before taking a long, slow swim south to Wilmington, North Carolina. When Jersey Shore native Dan Radel is not reporting the news, you can find him in a college classroom where he is a history professor. Reach him at dradel@annettnj.com.

133. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: These Eastern NC barbecue spots turn a day trip into a feast,” GPT-5.6 retrieved a *Star News* article and output an extensive multi-section summary following the same structural organization as the original article, reproducing its section-by-section recommendations and paraphrasing the substantive content from the article. See Ex. B at 17.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: These Eastern NC barbecue spots turn a day trip into a feast In-depth summary The article, written by Allison Ballard for the Wilmington StarNews and published July 25, 2026, presents Eastern North Carolina barbecue as both a culinary tradition and an ideal road-trip theme. From Wilmington, travelers can reach several celebrated barbecue destinations within a few hours, combining small-town sightseeing with an exploration of the region's food heritage. (currently at yahoo.com) Eastern North Carolina's barbecue identity The region's defining style is: • Whole-hog barbecue, rather than meat from only the shoulder • Pork seasoned with a vinegar-based sauce • Cooking techniques and recipes maintained across generations • Rural restaurants that often embody local history as much as dining culture The article treats these restaurants as interconnected pieces of a larger tradition. Rather than naming one definitive winner, it encourages readers to visit several and compare their approaches. Classic destinations Skylight Inn BBQ — Ayden Skylight Inn is presented as the natural starting point. Established in 1947, it specializes in chopped whole-hog pork mixed with crispy pieces of skin, or cracklings. National Geographic recognized it in 1979, and it has since become a benchmark for judging Eastern North Carolina barbecue. Grady's BBQ — Dudley Grady's is highlighted not only for its barbecue but also for its homemade side dishes and desserts. It represents the complete traditional barbecue meal rather than concentrating exclusively on smoked pork. Other established restaurants recommended for future trips include: • Wilber's Barbecue in Goldsboro • Bum's Restaurant in Ayden • B's Barbecue in Greenville Because there are too many worthwhile establishments for a single outing, the article suggests dividing them among multiple trips. It also directs readers toward North Carolina's historic barbecue trail and Bar-B-Q Hall of Fame for additional ideas. A new generation of pitmasters The article then explains that the tradition is evolving rather than remaining frozen in the past. Sam Jones BBQ — Winterville Sam Jones is a third-generation pitmaster descended from the Skylight Inn tradition. His restaurant demonstrates how younger practitioners can preserve whole-hog barbecue while adapting its presentation and restaurant setting for contemporary diners. Southern Smoke — Garland Chef and cookbook author Matthew Register offers another modern interpretation. His menu combines traditional barbecue with more contemporary side dishes and changing specials. Together, these restaurants illustrate continuity: newer pitmasters are not necessarily abandoning Eastern North Carolina's heritage, but expanding what can be done within it. National recognition The article widens the itinerary to include restaurants recognized by major culinary institutions: • Prime Barbecue in Knightdale received Michelin Bib Gourmand recognition. • Dampf Good BBQ in Cary was also recognized by Michelin. • Lexington Barbecue in Lexington received a James Beard Foundation America's Classics Award. Lexington Barbecue represents a neighboring but distinct North Carolina tradition, making it useful for travelers who want to compare regional styles rather than focus exclusively on eastern whole-hog barbecue.	Wilmington Star-News ARTICLE https://www.starnews.com/story/lifestyle/food/2026/07/25/best-eastern-nc-barbecue-restaurants-for-a-wilmington-road-trip/90937584007/ These Eastern NC barbecue spots turn a day trip into a feast Allison Ballard · Wilmington StarNews Just a couple of hours from the Wilmington area, it's possible to take a closer look, and taste, of one of the country's most beloved and distinctive foodways. Sure, there are barbecue traditions around the world, but in Eastern North Carolina, barbecue has been whole-hog and vinegar-doused for decades, based on generations of heritage. And there are so many potential stops, each offering its own piece of the barbecue puzzle, which makes it easy to plan a day trip, or weekend getaway, exploring the small towns and rural roads. If you've already checked out the Wilmington-area barbecue spots, and want to explore more, here are some ideas. More: 60+ restaurants, bars, more have opened this year in the Wilmington area Classic 'cue There's probably no better place to start a barbecue exploration than at Skylight Inn BBQ in Ayden. It's been chopping whole hog barbecue, and mixing in a bit of the crispy cracklings, since 1947. It was also lauded in National Geographic magazine in 1979 and has become a benchmark against which similar restaurants are compared. Grady's BBQ in Dudley is another one of the state's best barbecue spots, and might be just as popular for house-made sides and desserts. But so many other places also offer their take on this style -- Wilber's Barbecue in Goldsboro, Bum's Restaurant in Ayden, B's Barbecue in Greenville. You can try them all, maybe on different trips, though. Check out the North Carolina Bar-B-Q hall of fame and the historic barbecue trail for more ideas. More: Wilmington-area chef appears on Food Network show tonight. How to watch New 'cue Now, there are next generation and newer 'cue masters who are coming on the scene. Sam Jones is a third generation pitmaster in the Skylight lineage and his eponymous Sam Jones BBQ shows how these traditions are evolving. And at Southern Smoke in Garland, chef and cookbook author Matthew Register also offers a contemporary approach to barbecue, sides and specials. STAY CONNECTED: Keep up with the area's latest food news by signing up for the Port City Foodies newsletter and following us on Facebook and Instagram. BBQ accolades This style of food can also receive some pretty great culinary honors. If you want to add to your list, Prime Barbecue in Knightdale earned a Bib Gourmand award from the Michelin Guide and Dampf Good BBQ in Cary also got a mention from Michelin. For a neighboring barbecue style, try Lexington Barbecue in Lexington, which earned the America's Classics Award from the James Beard Foundation. Travel tips If you're going to hit the barbecue road, consult social media pages and websites, if possible, to make sure businesses will be open when you get there. Bring cash. While some of these spots accept cards, a few of them are cash-only. Allison Ballard is the food and dining reporter at the StarNews. You can reach her at aballard@starodayco.com.
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134. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking “Please find and summarize the article with this title and give me an in-depth summary: Supervisor calls for referendum on Milwaukee County courthouse revamp,” GPT-5.6 retrieved a *Milwaukee Journal Sentinel* article and output an extensive multi-section summary following the same structural organization and reproducing the substantive content from the original article. See Ex. B at 10.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Supervisor calls for referendum on Milwaukee County courthouse revamp In-depth summary The article, published July 10, 2026, concerns Milwaukee County Supervisor Justin Bielinski's proposal to let voters weigh in on the county's increasingly expensive courthouse redevelopment. The estimated cost recently rose to \$897 million—roughly twice the original projection. (not.com) What the referendum would do Bielinski proposed placing a contingent referendum on the November 3 ballot. It would ask whether the County Board should have to approve any additional financing required for the project's construction phase. The referendum would not directly approve or reject the courthouse redevelopment itself. Instead, it would address future borrowing and financial commitments. Bielinski's resolution also sought \$18,000 from the county's contingency fund to administer the vote. (not.com) Bielinski's argument Bielinski, described as the project's strongest opponent on the County Board, argues that a project of this magnitude could: - Require substantial long-term borrowing; - Increase future debt-service obligations; - Put upward pressure on property taxes; - Consume borrowing capacity needed for parks, transit, roads, bridges and other public facilities; - Commit taxpayers before the project's final financing structure is clear. The county's 2026 capital budget was already constrained by a \$56.8 million bonding limit, leaving \$63.3 million in requested borrowing authority unfunded. Bielinski therefore believes voters deserve a formal voice before the county makes an enormous construction-phase commitment. (not.com) Why county officials say reconstruction is necessary The courthouse complex is nearly a century old, spans more than 320,000 square feet and houses criminal courts, the County Jail, and the sheriff's and district attorney's offices. Officials have described the buildings as severely outdated and functionally obsolete. Reported problems involve security, public safety and more than \$75 million in deferred maintenance. County Executive David Crowley argues that replacement is no longer optional because the Public Safety Building has exceeded its useful life. In his view, the real questions are when replacement occurs and how responsibly it is financed. (not.com) Crowley administration's response Crowley's office called the referendum proposal premature. Spokesperson Jonathan Fera argued that the county has not completed its normal capital-project review and still must: 1. Present updated costs publicly; 2. Identify and analyze available funding sources; 3. Determine the final project scope; 4. Give the County Board, stakeholders and public complete information. The administration therefore contends that asking voters to decide before those details are settled would put “the cart before the horse.” Crowley also maintains that alternative funding sources could absorb much of the increase and reduce the burden on county property taxpayers by more than \$400 million, although the article does not give a complete funding breakdown. (not.com) Cost and construction timeline Approximately \$38.6 million had been allocated from fiscal years 2024 through 2026 for planning, design and consulting. Roughly \$858 million would still be required for construction. Design began in late 2024. Under the timeline described: • Design and preliminary work would continue through 2028; • Demolition would begin around 2028; • Construction would run from approximately 2029 through 2032. The long schedule also exposes the project to further inflation, financing and delay risks. (not.com)	Milwaukee Journal Sentinel ARTICLE https://www.jsonline.com/story/news/local/milwaukee/2026/07/10/supervisor-calls-for-referendum-on-milwaukee-county-courthouse-revamp/90867835007/ Supervisor calls for referendum on Milwaukee County courthouse revamp Vanessa Swales · Milwaukee Journal Sentinel A Milwaukee County Board supervisor wants the public to weigh in on the county's multi-million dollar project to revamp the county's downtown courthouse complex. In early July, the county updated its project estimate to \$897 million to overhaul the crumbling downtown courthouse complex, roughly doubling initial projections. Supervisor Justin Bielinski, who has been the biggest opponent to the project on the board, authored a resolution calling for a contingent referendum on the Nov. 3 ballot. The referendum would ask voters whether they would require County Board approval for any additional financing needed for the construction phase of the courthouse project. The resolution, which will go before the finance committee on July 23, also asks for the transfer of \$18,000 from the appropriation for contingencies to the Milwaukee County Election Commission to offset the cost of the referendum. “A capital project of this size is likely to require substantial long-term borrowing, debt service, and future budget commitments by Milwaukee County, which may place upward pressure on the property tax levy to service the debt issued to finance the project,” Bielinski's resolution says. The more than 320,000-square-foot Courthouse Complex is almost 100 years old and is home to the county's criminal courts, County Jail as well as the Sheriff's and District Attorney's offices. The existing judicial buildings have been called “severely outdated” and “functionally obsolete,” creating public safety and security concerns over the years as its maintenance backlog exceeds \$75 million. Upon the release of new project estimates, County Executive David Crowley argued he expects his administration's funding approach to cover the increased costs of the courthouse project and cut the cost to county property tax payers by more than \$400 million by tapping other sources. Crowley has described the project as urgent. “The Public Safety Building has well surpassed the end of its life. The question in front of us isn't whether we replace it, but when we will do it and how responsibly we can get it done,” Crowley said in a statement July 2. After Bielinski's proposal became public, Jonathan Fera, the spokesman for Crowley, said the resolution “really puts the cart before the horse.” Fera noted that many steps still need to take place, including a public presentation on the project cost and available funding options, and the County Board still must weigh in on the possible funding avenues and the scope of the project. “Milwaukee County has a process for reviewing capital projects, which has not occurred yet,” Fera said in a text message to the Milwaukee Journal Sentinel. “Elected leaders, stakeholders, and the public deserve to have all the information before being asked to make these major decisions.” The design phase of the new courthouse complex began in late 2024 and with initial timelines expecting to wrap up in 2028 and demolition set to start that year. Construction is expected to take place between 2029 and 2032. So far, the county has allocated roughly \$38.6 million between fiscal years 2024 and 2026 for the preliminary planning, design and consulting work for the project. Approximately \$858 million will be needed for the remaining construction. The county's adopted capital budget for 2026 was limited to the approved bonding cap of \$56.8 million, which leaves \$63.3 million in requested bonding authority unfunded, Bielinski's resolution says, adding that substantial borrowing for the project could limit the county's ability to finance other major infrastructure needs, such as parks, transit, bridges, roads as well as other public facilities. “Because of the magnitude and potential countywide fiscal impact of this project, Milwaukee County voters should have a voice through a contingent referendum before the County makes a final construction-phase funding commitment for the [courthouse] project,” the resolution said. (This story was updated to add new information.)
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135. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Ohio is losing people, housing is a big reason they flee,” GPT-5.6 retrieved a *Columbus Dispatch* article and output an extensive multi-section summary following the same structural organization as the original article, tracing the article’s structure and reproducing exact details from the article. See Ex. B at 23.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Ohio is losing people. Housing is a big reason they flee. Opinion Article overview “Ohio is losing people. Housing is a big reason they flee.” is a November 26, 2024 opinion column by Jon Melchi, executive director of the Building Industry Association of Central Ohio. It originally appeared in <i>The Columbus Dispatch</i>. (yahoo.com) In-depth summary Melchi argues that Ohio’s projected population decline is closely connected to its failure to produce enough suitable housing. An Ohio Department of Development study reportedly projected that the state could lose 675,000 residents by 2050. He presents that forecast as an urgent warning for elected officials, businesses, and communities. Housing influences whether people stay Although people relocate for many reasons, Melchi identifies housing availability as a major factor: - Recent graduates may leave if they cannot find affordable starter housing. - Growing families may move elsewhere if appropriate homes are unavailable. - Older residents may relocate if they cannot find smaller, accessible, or age-appropriate housing. His broader point is that Ohio needs homes at different prices and for every stage of life. A housing market dominated by limited or unsuitable options cannot retain a diverse population. Central Ohio is an early warning Central Ohio currently has stronger population and economic growth than much of the state, but Melchi says it still falls short by approximately 7,000 homes per year. That shortage raises prices, creates instability, and threatens future growth. He describes the region as a “canary in the coal mine”: if prosperous central Ohio cannot build enough housing despite strong demand, less economically dynamic communities may face even greater difficulty replacing aging homes and attracting residents. Ohio’s housing stock is old Citing a white paper from the BIA Foundation, Melchi reports that: - Nearly 20% of Ohio homes were built before 1939. - About half of the state’s housing stock is more than 50 years old. He does not argue that older or historic homes should simply be demolished. Instead, he says preservation and new construction can coexist. Historic neighborhoods can be protected while communities add contemporary housing types that better match present-day needs. New construction has not recovered Melchi compares Ohio with Indiana to illustrate what he sees as severe underproduction. Despite Ohio having nearly five million more residents, the states reportedly produced almost identical numbers of homes: 26,726 in Ohio versus 26,681 in Indiana. Before the Great Recession, Ohio regularly exceeded 40,000 annual housing starts. Melchi argues that the state should work toward that level again. The underlying implication is that Ohio’s construction sector never fully recovered from the housing crash, even as household needs continued changing. Builders say they are ready—but constrained Writing as a building-industry representative, Melchi says housing providers are frustrated because they cannot satisfy demand. He does not provide a detailed list of obstacles in this short column, but his appeal implies that public policy, local approval systems, and development conditions are preventing construction from responding adequately. He calls for builders and public officials to work together on a statewide, “21st-century” housing strategy.	The Columbus Dispatch ARTICLE https://www.dispatch.com/story/opinion/columns/guest/2024/11/26/ohio-housing-shortage-population-decline-columbus/76290502007/ Ohio is losing people. Housing is a big reason they flee. Opinion Jon Melchi “Our housing shortage is a long-term threat to the growth that we have been fortunate to experience,” Jon Melchi Jon Melchi is executive director of the Building Industry Association of Central Ohio. Ohio could lose 675,000 Ohioans by 2050. That sobering news was reported by The Dispatch from a recent Ohio Department of Development study. It should be a wake-up call to residents, businesses and elected officials. People leave communities for various reasons, but without question, one of the main drivers is housing. If our young people can’t find a place to live when they graduate, they move to another market. If a growing family can’t find a place to accommodate children, they must look elsewhere. If seniors can’t find a home that fits their current and future needs, they will be forced to find a community that does. If we want to ensure Ohioans stay in our state, we must provide adequate housing options at all price points for people at all stages of life, and far too often, we have not. Some will say that housing is a problem unique to central Ohio, and I disagree. Central Ohio the canary in the coal mine Yes, the housing demand in our market is greater than the rest of the state, and the inability to meet this demand has led to higher costs and housing instability. Our housing shortage is a long-term threat to the growth that we have been fortunate to experience. Central Ohio is, in many ways, the canary in the coal mine of housing underproduction. If we can’t meet the demand here, where we are currently under-building by 7,000 homes annually, how can we expect to meet the demand in other communities that aren’t seeing the prosperity we have? The BIA Foundation published an Ohio Housing Policy White Paper earlier this year. The study revealed a few critical facts to consider when assessing our housing market. First, nearly 20% of the state’s housing stock was built before 1939, and 50% is over 50 years old. Wanting to preserve historic homes and parts of our community and building new homes that meet the needs of today’s consumers do not have to be mutually exclusive. We can preserve historic homes and build new homes that provide housing options that may not exist in a community today. Home builders are frustrated Statistics demonstrate that despite having nearly 5 million more residents than Indiana, Ohio produced only 45 more homes — 26,726 vs. 26,681. Before the Great Recession, Ohio routinely topped 40,000 housing starts annually, and we must push back toward that number. I am privileged to work on behalf of the residential construction industry in central Ohio. I can tell you firsthand the palpable frustration that housing providers have at being unable to meet our communities’ demands. We stand as willing partners to help our local and state officials understand the challenges and work to find solutions to building homes in our region and state. We need a 21st-century plan to build homes across our state, or we risk an increasing number of current and future Buckeyes leaving our region and state to find communities that can meet their housing needs.
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136. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, "Please find and summarize the article with this title and give me an in-depth summary: What's the whitewater course like at Riversport OKC? We hopped on the rapids to find out," GPT-5.6 retrieved an *Oklahoman* article and output an extensive multi-section summary following the same chronological structure as the original article. *See* Ex. B at 33.

gpt-5.6-sol

QUERY

Please find and summarize the article with this title and give me an in-depth summary:
What's the whitewater course like at Riversport OKC? We hopped on the rapids to find out

In-depth summary

Amanda Avila's July 20, 2026 article for *The Oklahoman* is a first-person account of navigating Riversport OKC's artificial whitewater course—the venue being used for elite canoe slalom competition and preparations connected with the 2028 Los Angeles Olympics. (sports.yahoo.com)

The setup

Avila attempts the course in an inflatable kayak, commonly called a "duckie," despite being a beginner. Her trip occurs while nearly 400 athletes from 50 countries are training at the facility for the 2026 ICF Canoe Slalom World Championships.

That contrast drives the article: world-class athletes make the course look effortless, while Avila experiences how physically and mentally demanding even its easier route can be.

Preparation and safety

Before entering the current, a guide gives Avila a short lesson covering:

- Basic paddling and turning
- Keeping the kayak upright
- Pointing the bow downstream
- Staying centered in narrow channels

One guide leads from the water, while another follows on land carrying a rescue rope. Although these precautions make the experience relatively controlled, they also heighten her awareness of the risks.

What the course feels like

The run begins with a small launch ramp that Avila compares to the first drop of a roller coaster. The early, Level 1 rapids are less difficult than she expects. Her inflatable kayak initially feels stable, and she succeeds by paddling steadily and keeping it aligned with the current.

The challenge escalates after the guide announces that the easy section is over. The subsequent chutes feature:

- Faster currents
- Larger and more forceful waves
- Repeated drops
- Greater risk of being pushed sideways
- Less time to correct mistakes

The course demands continuous paddling and quick reactions. Avila finds that maintaining a straight line requires considerable upper-body effort, particularly as the waves strike the kayak from different directions.

The most dangerous moment

At one point, the current spins her around and leaves her traveling backward toward another drop. This becomes the article's dramatic peak. Afraid of capsizing, she instinctively paddles hard enough to turn the kayak downstream again before reaching the next rapid.

She ultimately completes the run without falling into the water—her main goal from the start.

Trying canoe-slalom gates

After surviving the rapids, Avila becomes confident enough to attempt maneuvering through the hanging slalom poles used by competitive athletes. Her effort quickly ends when several poles hit her in the face.

The comic episode illustrates the enormous difference between merely getting through the current and racing through it while accurately negotiating gates. Even on the beginner route, controlling direction precisely is much harder than it appears from shore.

Final impression

The guides praise Avila's performance, but she finishes with greater respect for competitive canoe-slalom athletes. She emphasizes that she completed only the beginner version, stopping short of a launch that would have carried her into the full competition channel.

The Oklahoman

ARTICLE

https://www.google.com/goto?url=CAESvAEB7keqTe-hQz0SX5W0Enu44PR9ZG-8QG0Tbja4Y4ZT1KXnQy9IXwl-SMj8-k7ZF1ImO7otdhhXqqq4vKMiRo0MGKUlewAEhVjmr9-jh7UINoLeECDHzPXbF-4dFV6dUwb5xnX_icj3_QQoTaDyJY4UExrVijW_LukHRG0ddr4_YAsMUclGyHkpV1aGogwAW1W3hiMT15IJQIMi_kLW10MXuWNAN9gfmBdgPr58mwf_czntsgqsUomWmA=

What's the whitewater course like at Riversport OKC? We hopped on the rapids to find out

Amanda Avila · The Oklahoman

It took only about a second at the top of Riversport Whitewater Center for reality to hit me.

I was sitting in an inflatable kayak, about to go down the world championship and Olympic course.

"No pressure," Riversport director Chris Sorensen said with a laugh. "You're sharing the course with the Italian medalist."

Oh, great.

As part of *The Oklahoman's* series exploring the rise of canoe slalom in Oklahoma City ahead of the 2026 ICF World Championships and 2028 Olympics, I naively agreed to take on the same whitewater course as the best in the world — as an amateur.

And yes, nearly 400 athletes from 50 nations were already there training.

As I stepped off the golf cart and into the duckie — the inflatable, more stable version of a kayak for people like me who don't know what they're doing — I saw Marta Bertonecchi.

The Italian canoe slalom star waved in my direction. At me? I have no idea. But I nervously smiled and waved back. I wasn't about to leave a two-time Olympian hanging.

That was the second moment I got nervous.

The first came about 15 minutes earlier when I heard the reporter who went before me had fallen in.

But I already had all my gear on: a helmet with a waterproof camera attached, a life jacket strapped so tightly it was hard to breathe (or maybe I was just breathing harder) and the cheap water shoes I bought on Amazon the day before, when I learned flip flops weren't allowed.

There was no turning back now.

My first challenge was stepping into the duckie without tipping it over.

Challenge complete.

The guide then pushed me in the water and explained the basics: how to paddle, how to turn, how to not flip — that was the one I paid most attention to.

Then he smiled and said, "You're ready."

You sure? I thought.

Thankfully, he paddled in front of me. And another guide followed us on land with a rope. I think it was supposed to be reassuring, but I couldn't help but wonder why I might need a rope.

We first went down a small launch ramp. I called it the point of no return.

It felt like that moment at the top of a roller coaster when you start rethinking what you've gotten yourself into before the first drop.

At least it was a small drop. Not that bad.

Then came the rapids. I had one goal: Don't fall in!

I paddled left, right, left, right to keep the duckie straight. The first wave came, splashed me in the face and soaked my lower half.

Here we go.

To my own surprise, I was staying upright. The guide had told me that keeping the bow downstream and staying in the middle of the narrow chutes were the keys. Somehow, I was doing just that.

The article portrays Riversport OKC as both accessible and intimidating. Beginners can experience the course safely with instruction, appropriate equipment and guides, but the increasing speed and instability reveal why elite canoe slalom requires exceptional strength, precision and composure.

More broadly, Avila uses her experience to help readers understand the venue physically: it is not simply a recreational water attraction but a serious, technically demanding course capable of challenging Olympic-level athletes. (sports.yahoo.com)

The first few rapids were easier than I expected.

Then the guide pulled over to the side. For a second, I thought I did something wrong.

"That was Level 1," he said. "Now is where it gets harder."

That was the first time I heard there were levels to this thing.

I gave a nervous "Ok."

We went down another chute ... and another ... and another. I lost count.

The current kept getting faster. Every wave seemed determined to shove me sideways and make me fall off. The duckie suddenly didn't feel so stable anymore.

I dug deep, relying on every bit of arm strength I had to keep paddling as evenly and quickly as possible.

There was one point I thought I wasn't going to make it. I blinked, and suddenly I was backward. BACKWARD.

All I could think about was the reporter who had fallen in before me. This can't be the moment. Not today.

I don't know how I was able to turn it around so fast before another drop, but thankfully my fight-or-flight instincts kicked in and got me back on track.

A couple rapids later, I looked up and realized I had made it through.

Mission accomplished! I hadn't fallen in.

"That was it," the guide said.

I let out a huge sigh of relief.

"Now we just get to coast through these gates."

Feeling a little too confident, I decided to try weaving through them like the professionals.

Instead, multiple white poles were hitting me in the face. I was quickly done with that.

We paddled toward the stairs, stopping just before another launch that would have sent me into the competition channel. I paddled with everything I had to avoid drifting that way.

As I stood up, both guides told me I'd done well.

"You were the perfect client," one said. "You're a natural," said the other one.

Maybe they were just being nice, but I'll take it either way.

The athletes deserve all the credit for making it look effortless. I went down the beginner version and was just happy to make it down the river in one piece without taking a swim.

Amanda Avila is a sports intern for The Oklahoman. Have a story idea for Amanda? She can be reached at avila@oklahoman.com or on X/Twitter at @avilaonair. Support Amanda's work and that of other Oklahoman journalists by purchasing a digital subscription today at subscribe.oklahoman.com.

137. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking "Please find and summarize the article with this title and give me an in-depth summary: Biggest and wildest snowstorms in Rochester NY ranked. See the list," GPT-5.6 retrieved a *Democrat & Chronicle* article and output an extensive multi-section summary following the same structural organization as the original article, reproducing the article's ranked lists of Rochester's largest multi-day and single-day snowstorms in the article's original order and including distinctive details such as the 63-hour snowfall of the 1900 storm, the Blizzard of '66 deaths in

Orleans County, and the 1999 state of emergency reimposed six hours after it was lifted. See Ex. B at 6.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Biggest and wildest snowstorms in Rochester NY ranked. See the list In-depth summary The article, originally published by Rochester's <i>Democrat and Chronicle</i> and republished by Yahoo, ranks the city's most extreme snowstorms by multi-day accumulation and single-day snowfall. Its central point is that Rochester's position along common storm tracks—and beside Lake Ontario's lake-effect snow machine—makes historic winter storms a recurring part of local life. (yahoo.com) Largest multi-day storms 1. Feb. 28–March 2, 1900 — 43.5 inches Rochester's biggest recorded storm brought snow continuously for 63 hours. Transportation and commerce stopped across the region, nearby Le Roy reported 10-foot drifts, Geneva lost outside communication, and Brockport was reachable only on horseback. Milk and other basic deliveries were severely delayed. 2. Feb. 27–March 3, 1984 — 32.7 inches The six-day Great Leap Day storm peaked when nearly two feet fell during February's final two days. Rochester temporarily shut down, and cleanup continued even after daily life began resuming on March 1. 3. Jan. 29–Feb. 2, 1966 — 28.8 inches The Blizzard of '66 combined heavy snowfall with intense lake effect. Some communities near Lake Ontario's eastern end reportedly received around 100 inches, with drifts reaching 30 feet. Rochester was paralyzed, supplies ran low, and a father and daughter died after their car was buried in Orleans County. 4. March 13–15, 2017 — 26.5 inches Its timing made this storm particularly damaging: it arrived only five days after a major windstorm had knocked out power throughout the region. Schools and businesses closed, while already strained residents and utility crews faced another major emergency. 5. Feb. 5–7, 1978 — 25.8 inches Part of a major Eastern U.S. storm, it closed sections of the Thruway and helped shut down Rochester on February 7. Two men died from heart attacks after shoveling. Problems with the city's response prompted an investigation into snow-removal failures. Largest single-day totals 1. March 1, 1900 — 29.8 inches The biggest day within Rochester's record-setting 1900 storm. Trains were canceled, roads blocked, schools and stores closed, and demand for home-heating coal surged. 2. Jan. 3, 1996 — 23 inches Lake-effect snow immobilized roads and other transportation systems. Schools closed for two days, while municipal plowing departments—already financially strained by earlier storms—struggled with the cleanup. 3. March 4, 1999 — 22.3 inches Snow accumulated at two to three inches per hour, producing widespread road chaos and prompting a state of emergency. The storm was worse than forecasters had anticipated. 4. March 6, 1999 — 18.4 inches A second major snowfall hit only two days later. Monroe County reinstated its state of emergency just six hours after lifting the previous one. Parts of the Thruway, malls and businesses closed. Together, the two storms made March 1999 Rochester's snowiest March on record. 5. Feb. 14, 1960 — 18.4 inches Deep drifts closed roads and grounded aircraft, although passenger trains kept operating. Two men died while shoveling. The storm contributed to the winter of 1959–60 becoming Rochester's snowiest season at the time. Main takeaways • The 1900 storm stands alone: It holds both the multi-day and single-day records in the article. • Accumulation alone does not determine severity: Power failures, drifting, wind, snowfall rate, depleted municipal resources and the timing of consecutive disasters often mattered just as much. • Lake effect is a major factor: Rochester can receive prolonged or unexpectedly intense snowfall because Lake Ontario supplies moisture to cold air moving across it. • Back-to-back events are especially disruptive: The 1999 storms and the combination of wind and snow emergencies in 2017 gave authorities and residents	<i>Democrat and Chronicle</i> ARTICLE https://www.democratandchronicle.com/story/weather/2026/01/25/biggest-and-wildest-snowstorms-in-rochester-ny-ranked-see-list/87619430007/ Rochester's biggest and wildest snowstorms ranked. See the list Victoria E. Freile · New York Connect Team Rochester is among the snowiest cities in nation. The region is astride common storm tracks and far enough north that precipitation often falls as snow instead of rain. And of course, the Flower City is located along the shore of one of the world's largest snow-generating machines — Lake Ontario. So epic winter storms are not uncommon. Here are some of Rochester's biggest: Snowstorms in Rochester NY: Biggest multi-day snowfall 1. February 28 - March 2, 1900. 43.5 inches Snow fell for 63 hours straight, making this the worst snowstorm and deepest snow pack ever seen in Rochester. The monster storm halted commerce and disrupted lives through the Great Lakes region, with cities from Cleveland to Buffalo to Montreal reporting blizzard conditions. In this area, Le Roy had 10-foot drifts, Geneva was cut off from outside communication and the only people who made it into Brockport arrived on horses. In the city, people bemoaned the fact that the daily milk train had been hours late and delivery vehicles weren't able to navigate the streets. 2. February 27 - March 3, 1984. 32.7 inches The Great Leap Day storm, as this was known, extended for six straight days. But the worst of it came on the last two days of February, when nearly 2 feet of snow fell and the Rochester area was briefly in shut-down mode. People had resumed their normal lives by March 1, but light snow continued as crews struggled to clear streets and haul away snow. 3. January 29 - February 2, 1966. 28.8 inches The Blizzard of '66 featured a great deal of lake-effect snow, with reports of 100-inch snowfalls and 30-foot drifts at locations near the east end of Lake Ontario. The area was paralyzed for a time, and a father and daughter died of exposure along an Orleans County road after their car, which they'd pulled off the road, was buried in snow. The Feb. 2 <i>Democrat and Chronicle</i> contained a startling report that wholesale suppliers said the community was running short of food. 4. March 13-15, 2017. 26.5 inches This storm was insidious in that it began just five days after a ferocious windstorm knocked out power to much of the Rochester area. Schools and most businesses closed; those that remained open had few customers, as no one could travel. 5. February 5-7, 1978. 25.8 inches The entire eastern United States was socked by this storm. Part of the New York State Thruway was closed, and the stock exchange in New York City shut down as well. Locally, it started slowly but shut down Rochester on Feb. 7, 1978. Two men died of heart attacks after trying to shovel snow that lay two feet deep. The city manager later ordered an investigation of snow-removal failures. Snowstorms in Rochester NY: Biggest single-day snowfall 1. March 1, 1900. 29.8 inches This mother of all one-day storms forced cancellation of most train service, blocked roads, closed schools, shuttered stores and left coal companies hustling to meet a spike in demand. This was the second day of a three-day event that became the biggest snowstorm on record here. 2. January 3, 1996. 23 inches A good portion of this mammoth snowfall was lake-effect snow from Lake Ontario. Transportation networks ground to a halt, and schools were closed for two days straight. Municipal highway departments, their budgets already depleted by a heavy plowing workload in November and December, cried poverty. 3. March 4, 1999. 22.3 inches "Blizzard of '99" screamed the headline atop the next day's <i>Democrat and Chronicle</i>. "Big blow triggers mammoth paralysis, road chaos." A state of emergency was declared after a storm that drops 2 to 3 inches of snow an hour ravaged the region. Chagrined forecasters admitted they hadn't foreseen the severity of the storm.
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138. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, "Please find and summarize the article with this title and give me an in-depth summary:

NJ's Jamie Ding wins 17th straight on 'Jeopardy!'. See his ranking," GPT-5.6 retrieved a *Bergen Record* article and output an extensive multi-section summary that paraphrased the article, tracking its substance and structure. See Ex. B at 14.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: NJ's Jamie Ding wins 17th straight on 'Jeopardy!'. See his ranking In-depth summary The article, written by John Connolly and published April 6, 2026, reports that "Jamie Ding of Lawrenceville, New Jersey, earned his 17th consecutive victory on <i>Jeopardy!</i>" (aol.com) His historical ranking The victory moved Ding into 10th place by himself on the show's all-time consecutive-wins list. He surpassed: - Ryan Long, who won 16 games in 2022 - Scott Riccardi, another New Jersey contestant, who won 16 consecutive games After 17 appearances, Ding had earned \$494,012. At that point, the article ranked him: - Eighth in all-time regular-season winnings 19th in overall <i>Jeopardy!</i> winnings, including tournaments How he won his 17th game Ding faced Maggie Faucher, a research assistant from Pittsburgh, and Mikey Hlebasko, a sales-operations director from Marietta, Georgia. He dominated the game and entered Final Jeopardy with \$44,200, compared with Faucher's \$7,400 and Hlebasko's \$3,000. Because his total was more than twice the combined threat posed by his nearest opponent, he had already secured a runaway victory. The Final Jeopardy clue concerned longstanding plans for an enormously expensive link across the North Channel. The required response was Great Britain and Ireland, but none of the three contestants answered correctly. Ding's wager reduced his final score to \$31,611, which became his winnings for the episode. (newspub.live) Why Ding's run was especially notable The article emphasizes that Ding was not merely accumulating victories; he was producing exceptionally strong performances. On March 17, he reportedly achieved a \$42,400 Coryat score, exceeding Ken Jennings' previous benchmark of \$39,200 from June 10, 2004. On April 1, Ding also posted a \$39,200 Coryat score, matching Jennings' earlier figure. A Coryat score measures the value of clues a contestant answers correctly, while excluding the effects of Daily Double and Final Jeopardy wagers. It therefore helps indicate a player's underlying knowledge and buzzer performance. Background and public recognition Ding works for the New Jersey Housing and Mortgage Finance Agency, connecting his public-service career with affordable-housing initiatives. His streak secured him a place in the season-ending Tournament of Champions. The article also notes public congratulations from prominent New Jersey politicians, including: - Governor Mikie Sherrill - Senator Andy Kim - Senator Cory Booker Booker praised Ding both for representing New Jersey on television and for supporting affordable housing professionally. Although Ding lives in Lawrenceville, he originally comes from the Detroit area. He graduated from Grosse Pointe North High School in 2009 and Princeton University in 2013. The story also offers a lighter personal detail: Ding and his sister operate an Instagram account reviewing General Tso's chicken from different restaurants, something Ding discussed on the program. Main takeaway The article presents Ding's 17th victory as a major milestone: it placed him among the show's ten longest-winning contestants, pushed his regular-season earnings close to half a million dollars, and reinforced his reputation as an unusually dominant player—not simply a contestant surviving close games. (aol.com)	Bergen Record ARTICLE https://www.northjersey.com/story/entertainment/tv/2026/04/06/jamie-ding-of-new-jersey-wins-17th-straight-on-jeopardy/89489626007/ NJ's Jamie Ding wins 17th straight on 'Jeopardy!'. See his ranking John Connolly • NorthJersey.com The 'Jeopardy!' champ just keeps on rolling. Jamie Ding, of Lawrenceville, N.J., won his 17th straight game on the long-running game show to put him alone in 10th place on the all-time 'Jeopardy!' wins list, according to TheJeopardyFan.com. He broke a tie with Ryan Long (16 wins in 2022) and fellow New Jerseyan Scott Riccardi, an engineer and Rutgers grad from Somerville, who won 16-straight last July. On the Monday, April 6 show, Ding won \$31,611 to bring his 17-day total to \$494,012, which is eighth on the regular-season money list all-time and 19th overall. Ding's opponents on Monday's show were: Mikey Hlebasko, a sales operations director from Marietta, Georgia, and Maggie Faucher, a research assistant from Pittsburgh. Take our quiz: Think you can beat NJ 'Jeopardy!' champ Jamie Ding? Heading into Final Jeopardy in Monday's game, Ding had the contest wrapped up with \$44,200 to Faucher's \$7,400 and Hlebasko's \$3,000, TheJeopardyFan.com reported. The Final Jeopardy was: "At least since 1890 plans have existed to link these two islands across the North Channel: a 2021 estimate ranged around \$450 billion." All three contestants missed the correct answer, which was: "What is Great Britain and Ireland?" Inside the numbers: How NJ 'Jeopardy!' star Jamie Ding's wins compare to past champions Who is Jamie Ding? Ding, who works for the New Jersey Housing and Mortgage Finance Agency, has secured a spot in the season-ending Tournament of Champions. He has a supporter in New Jersey Gov. Mikie Sherrill, who posted applauding Ding after he set an impressive record on the show that began 62 years ago. On the March 17 show, Ding set the mark for highest Coryat score with \$42,400, topping the record of \$39,200 achieved by now 'Jeopardy!' host Ken Jennings back on June 10, 2004, according to TheJeopardyFan.com. On the April 1 show, Ding tied Jennings with a \$39,200 Coryat. A Coryat score, named after a former contestant, is the sum of the natural value of any clues without Daily Doubles or Final Jeopardy. Sen. Andy Kim has also tweeted out congratulations to Ding during this impressive run on the show. While Sen. Cory Booker tweeted on April 1: 'Jamie Ding! Making New Jersey proud! This Lawrenceville resident spends his days helping fund affordable housing across the Garden State, then goes on national TV and dominates. The man answers trivia on @Jeopardy and houses people for a living. New Jersey does not miss. Keep buzzing, Jamie.' Originally, Ding is from the Detroit area, having graduated from Grosse Pointe North High School in 2009. He graduated from Princeton University in 2013. Ding told his alma mater that being on the show is "phenomenal." He and his sister have a Instagram account where they review General Tso's chicken at restaurants called: @attorneygeneraltsos. Ding talked about it on the show.
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139. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Rally for Ukrainian Independence Day draws crowd in downtown Detroit,” GPT-5.6 retrieved a *Detroit News* article and output an extensive multi-section summary following the same structural organization as the original article, reproducing the substantive content from the article. See Ex. B at 27.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Rally for Ukrainian Independence Day draws crowd in downtown Detroit Article summary “Rally for Ukrainian Independence Day draws crowd in downtown Detroit” was written by Carol Thompson of <i>The Detroit News</i> and published on August 23, 2026. It reports on a gathering of roughly 100 people at Hart Plaza marking Ukraine’s Flag Day and Independence Day while urging continued American support for Ukraine. (aol.com) What happened Hart Plaza was filled with Ukrainian blue-and-yellow flags as demonstrators celebrated Ukrainian national identity and expressed solidarity with the country amid Russia’s continuing invasion. The gathering served both as a cultural commemoration and a political appeal: organizers wanted to ensure that Ukraine and the war’s human cost were not forgotten. The central message Speaker Max Popko of Novi, a Ukrainian American who moved to the United States 11 years earlier, argued that supporting Ukraine is also in America’s strategic interest. He characterized Russia as an adversary of both countries and presented Ukraine as more than a distant conflict zone—it is an independent nation whose people share Americans’ commitment to freedom and sovereignty. His remarks reframed the rally from a simple holiday celebration into a defense of democratic independence. The underlying argument was that Ukraine’s struggle has broader implications: if aggression against one independent country succeeds, it threatens principles important to other democracies as well. (aol.com) Why the rally mattered locally The article connects the event to Metro Detroit’s substantial Ukrainian community. Census figures cited in the story indicated that approximately 38,000 Michigan residents were of Ukrainian descent as of 2022. Russia’s full-scale invasion has had direct local consequences: - Metro Detroit volunteers have assembled medical and trauma supplies for Ukrainian soldiers. - Refugees escaping the war have resettled in the region. - Ukrainian Americans continue to worry about relatives and friends exposed to attacks overseas. Thus, the rally was not merely symbolic or concerned with remote foreign policy. For many participants, the war affects people they personally know and love. (aol.com) Appeal for continued support Olga Yakimenko of Helping Hands for Ukraine said the event was intended to keep Ukraine in the public consciousness. She expressed gratitude for the support provided by the American public and government, while emphasizing that Ukraine still needs American political unity, compassion and advocacy. Her statement reflects the article’s central concern: as the war continues, public attention and willingness to assist may weaken. The rally’s organizers therefore sought both to thank Americans and to prevent solidarity from fading. Wartime context The story places the Detroit gathering against the backdrop of escalating Russian aerial attacks. It reports deadly strikes shortly before the rally in Kryvyi Rih and Kyiv, including civilian and child casualties. This context gives urgency to the demonstrators’ message: the appeal for support concerned an active and continuing humanitarian crisis, not only a symbolic geopolitical dispute. (aol.com)	www.detroitnews.com ARTICLE https://www.detroitnews.com/story/news/local/michigan/2026/08/23/rally-ukrainian-independence-flag-day-holidays-detroit-downtown-hart-plaza/91433454007/ Rally for Ukrainian Independence Day draws crowd in downtown Detroit Carol Thompson · The Detroit News Downtown Detroit’s Hart Plaza was swept with blue and yellow Sunday, Aug. 23 as demonstrators gathered to recognize Ukraine’s Flag Day and Independence Day holidays and support the country in its fight against Russia’s years-long invasion. Max Popko of Novi addressed the crowd of roughly 100 gathered downtown. He said he is a Ukrainian American who moved to the United States 11 years ago. His mission Sunday was to show Americans that it is in their best interests to support Ukraine, arguing Russia is an enemy to both nations. More: Ukrainian Americans in Detroit rally against Russia’s war, call for freedom “So, my friends, what we’re doing here is more than celebrating the Independence Day of Ukraine,” he said. “We’re showing Americans that Ukraine is not just a place on a map. Ukraine is a country full of people with huge hearts who support their independence and the independence of America.” Russia’s 2022 invasion of Ukraine reverberated in Metro Detroit, where volunteers packed and sent medic and trauma kits to soldiers and where refugees fleeing the war have made new homes. As of 2022, there were roughly 38,000 people of Ukrainian descent in Michigan, according to Census data. Russia is escalating its air war on Ukraine as fighting on the battlefield grinds toward the 4-1/2 year mark. At least six people were killed and around 90 wounded Friday, Aug. 21, when Russian drones attacked a shopping centre in the central Ukrainian city of Kryvyi Rih, President Volodymyr Zelenskyy’s hometown, local authorities said. At least six children were wounded. On Thursday, Aug. 20, 16 people were killed in a Russian ballistic missile attack on the Ukrainian capital Kyiv. Zelenskyy called the attack “absolutely cynical and despicable.” The Aug. 23 gathering at Hart Plaza was to ensure Ukraine is not forgotten, said Olga Yakimenko of Helping Hands for Ukraine. The war is deeply personal to Ukrainians in the U.S. and is harming their families, friends and people they love. “We are incredibly grateful to the American people and to the United States for standing with Ukraine during these very difficult years,” Yakimenko said in a statement. “That support has meant more to Ukrainians than words can express. “Our message today is simple: please continue to stand with Ukraine. We hope Americans will remain united in supporting the Ukrainian people and their right to live in a free, peaceful and independent country. Ukraine still needs your support, your compassion, and your voice.” ckthompson@detroitnews.com
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140. As shown in the GPT-5.6 response below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: That's not Kathy Hochul. AI campaign ads are going too far,” GPT-5.6 retrieved a *USA TODAY* article and provided an extensive summary of the original article, following the article’s sequence and reproducing the substance of the article. *See* Ex. B at 19.

gpt-5.6-sol

QUERY

Please find and summarize the article with this title and give me an in-depth summary: That's not Kathy Hochul. AI campaign ads are going too far. | Opinion

Article overview

Title: "That's not Kathy Hochul. AI campaign ads are going too far."

Author: Sara Pequeño, USA Today

Published: July 16, 2026

Genre: Opinion column ([aol.com](#))

In-depth summary

The column argues that AI-generated political advertising has crossed from ordinary satire into dangerous deception, making government regulation necessary.

The Hochul deepfake

Pequeño opens with an advertisement produced by the campaign of Bruce Blakeman, a Republican opposing New York Gov. Kathy Hochul. It depicts a synthetic version of Hochul:

- Welcoming undocumented immigrants into a luxury hotel
- Walking near unhoused people sleeping in a park
- Socializing with wealthy donors
- Defending New York's elimination of cash bail
- Standing near a man who offers her crack cocaine

None of these scenes occurred. Hochul's appearance and dialogue were generated using AI. Only a small disclosure at the end identifies the imagery as artificial.

Blakeman defended the advertisement as humorous political satire, arguing that AI is simply another tool for producing entertaining content about public issues. Pequeño rejects that defense because the realistic imitation could easily be mistaken for authentic footage—especially if viewers see only a clip or overlook the disclaimer. ([aol.com](#))

Why disclosure is insufficient

The author's principal concern is that increasingly realistic AI makes distinguishing fabricated material from genuine recordings exceptionally difficult. Even if an advertisement contains a disclosure, placing it briefly at the end does little to protect viewers who miss it or encounter an edited version online.

The ad therefore does more than exaggerate Hochul's policies. By placing invented words in her mouth and depicting events that never happened, it manufactures apparent evidence. Pequeño sees this as fundamentally more deceptive than conventional negative advertising.

A broader political trend

The Hochul ad is presented as one example of AI spreading through American campaigns. Pequeño cites other synthetic advertisements, including:

- An ad that portrayed women in a Pilates class discussing their support for Los Angeles mayoral candidate Spencer Pratt
- A Texas ad depicting Democratic Senate candidate James Talarico as Maria from *The Sound of Music*, singing about transgender issues

These examples illustrate two ways AI can manipulate voters: fabricating support for a candidate and constructing humiliating or inflammatory portrayals of an opponent. ([aol.com](#))

Offensive and discriminatory content

Pequeño argues that AI-generated political media also facilitates racist, sexist and otherwise degrading imagery. She references synthetic portrayals involving Zohran Mamdani and Barack and Michelle Obama as examples of political content relying on racial stereotypes or dehumanization.

Although AI generates the imagery, she emphasizes that politicians remain responsible for requesting, approving and distributing it. Calling the content machine-generated does not absolve the human campaign behind it.

An escalating arms race

The author presently sees Republicans as responsible for many of the most egregious examples, but she does not portray the problem as inherently partisan. Her broader concern is that Democrats and other political actors will eventually feel compelled to respond in kind.

That would produce an escalating cycle:

1. One campaign releases an effective AI attack.
2. Its opponent concludes that restraint creates a competitive disadvantage.
3. Both sides increasingly employ fabricated footage.
4. Voters lose confidence in all political media, including authentic recordings.

USA Today

ARTICLE

<https://www.usatoday.com/story/opinion/columnist/2026/07/15/ai-deepfake-campaign-ad-regulation-politics/90901990007/>

That's not Kathy Hochul. AI campaign ads are going too far. | Opinion

Sara Pequeño · USA TODAY

Since AI is nonhuman and therefore does not have a gauge of what is appropriate, it falls on politicians to determine what's appropriate to publish – and we all know what a disaster that can be.

In a recent campaign ad against Kathy Hochul, the Democratic New York governor is shown welcoming undocumented immigrants into a luxury hotel, walking through a park filled with sleeping unhoused people and smiling with mega donors at a fancy dinner.

In one of the final moments of the ad, Hochul talks about how the state "ended cash bail so that we could stop punishing people who commit brutal crimes against our fellow New Yorkers, like this nice young man."

"Want some crack?" a tattooed man behind her asks outside a New York City police precinct.

At the end of the ad, the campaign slogan "Criminals, Cronies, and Illegal Immigrants for Hochul" flashes across the screen. The words under it are the most important part, yet easy to miss.

"Paid for by Blakeman for New York," the screen reads. "This video includes AI-generated imagery."

Nothing shown in the campaign ad is real. Not the hotel, the park, the clinic caring for sex workers or the man offering Hochul crack. This isn't even Hochul – it's a version of her created by artificial intelligence, a computer-generated doppelganger speaking in a hyperbolic fashion to benefit the governor's Republican opponent in the November election – Nassau County Executive Bruce Blakeman.

"Well, I use every tool available," Blakeman told PIX11, defending his use of artificial intelligence. "AI is very good at producing things that people want to watch, entertaining videos on important political issues. Sometimes we use humor and satire, which has been used in politics since George Washington."

AI is popping up in campaign ads across the country. In the Los Angeles mayor's race, an ad for Republican candidate Spencer Pratt showed a group of women in a Pilates class whispering that they would be voting for him (Pratt ultimately lost). In Texas, an AI ad of James Talarico showed the Democratic Senate candidate dressed as Maria from *The Sound of Music* singing a version of "My Favorite Things" about the transgender community.

Aside from the offensive things being created to disparage Democrats or make Republicans appear to have more support than they might have, the use of AI is something that should concern all American voters.

Another view: Politics doesn't need more fakery. AI is bringing it anyway. | Opinion

AI, deepfakes distort the truth – in politics and beyond

You might be wondering what the big deal is with using AI – an increasingly common tool – to generate campaign ads.

As artificial intelligence improves, we will have a harder time identifying what's real and what's fake. Research has shown we're not as good at identifying AI images as we might expect. When there's only a label at the end of the video, like the one from Blakeman's campaign, it's easy for people to miss and assume that the video of Hochul talking like a Republican's caricature of a Democrat is actually real.

There's also the fact that AI is being used to distort the truth – something that Republicans who have used the tool have defended as free political speech, but it certainly enters a murky legal area.

Finally, it's concerning that AI is being used to generate images that are morally questionable – at times even veering into racist territory.

In the 2025 New York City mayoral race, Zohran Mamdani was depicted by the Andrew Cuomo campaign as eating rice with his hands. President Donald Trump once used a video depicting former President Barack Obama and his wife, Michelle, as apes.

Since AI is nonhuman and therefore does not have a gauge of what is appropriate, it falls on politicians to determine what's appropriate to publish – and we all know what a disaster that can be.

Trump knows his Freedom Fuel is kind of socialism, right? | Opinion

141. As shown in the GPT-5.6 response reproduced below, in response to a prompt asking, “Please find and summarize the article with this title and give me an in-depth summary: Owls and Bulldogs were a bust. How Arizona State became the Sun Devils,” GPT-5.6 retrieved an *Arizona Republic* article and output an extensive multi-section summary following the same structural organization as the original article, tracing the article’s structure and reproducing exact details from the article. *See* Ex. B at 1.

gpt-5.6-sol QUERY Please find and summarize the article with this title and give me an in-depth summary: Owls and Bulldogs were a bust. How Arizona State became the Sun Devils	The Arizona Republic ARTICLE https://www.azcentral.com/story/news/education/college/2026/09/19/history-of-the-asu-sun-devil-and-sparky/91599728007/
In-depth summary Katherine Chircus's <i>Arizona Republic</i> article traces how Arizona State University cycled through several mascots before adopting the Sun Devils, an identity that has endured despite recurring controversy over its appearance. (sports.valhoo.com) From Owls to Bulldogs ASU's original mascot dates to 1889, when the institution was still called the Tempe Normal School. Students selected the Owls to represent the school. Later, after it became Arizona State Teachers College, the mascot changed to the Bulldogs. Neither identity proved permanent. As the institution grew and evolved, students sought a mascot that was more distinctive and connected to Arizona's desert environment. The 1946 vote In 1946, students voted \$19–196 to replace the Bulldogs with the Sun Devils. Alumni were also reportedly consulted and generally supported the change. Campus lore credits track coach Donn Kinzle with proposing the name. According to the story, he was running along the Salt River bed when he saw a dust devil and conceived the idea of the "Sun Devil." The name transformed a familiar desert phenomenon into a forceful, regionally specific athletic identity. ASU's basketball team was the first squad to compete under the new name, facing the independent Mesa Jaycees shortly after the change. The creation of Sparky The recognizable visual version of the Sun Devil emerged alongside the new name. In 1946, ASU alumnus and Disney illustrator Berk Anthony created the cartoon figure that became the university's official logo. A persistent university legend claims Anthony deliberately made Sparky resemble Walt Disney, though the article presents this as rumor rather than established fact. The mascot became a live character in 1951, when student Dick Jacobs became the first person to perform as Sparky. He appeared with Peggy Holiday and Peggy Sparkman, known as the Sparkettes. During the 1950s, Sparky's presentation evolved from a human-faced character into the masked figure familiar at athletic events. Controversies over Sparky's appearance Sparky's identity remained popular, but redesigns repeatedly caused friction. In 1971, students approved an updated version with more conspicuous horns. Some religious alumni believed it looked too much like Satan. Their objections went beyond aesthetic criticism: some reportedly threatened to withdraw financial support from the university. Another backlash occurred in 2013, when ASU attempted to make Sparky appear more cartoonish. Students and supporters organized Facebook groups and a Change.org petition against the redesign. The university ultimately retreated from the proposal, demonstrating how strongly alumni and students felt that Sparky belonged to the wider ASU community—not simply to university administrators or marketing departments. Central theme The article is ultimately about the construction of institutional identity. "Sun Devils" succeeded where "Owls" and "Bulldogs" did not because it was: • Distinctive: It separated ASU from schools using more conventional animal mascots. • Regional: The name evoked Arizona's sun, heat, desert and dust devils. • Adaptable: It could function as a team name, illustrated logo and costumed character. • Community-owned: Students originally approved it and have repeatedly defended their preferred version of Sparky. Although Sparky's design has changed—and occasionally angered religious alumni, traditionalists and students—the underlying Sun Devil identity has remained remarkably resilient. Chircus closes from a personal perspective, observing that ASU students and alumni continue to embrace the name with pride. Bottom line: ASU became the Sun Devils through an overwhelmingly approved 1946 student vote, inspired by desert imagery and reinforced by Berk Anthony's Sparky illustration. Subsequent disputes over Sparky's horns and redesigns show that the mascot is not merely branding; it has become a deeply held symbol of belonging to Arizona State.	Owls and Bulldogs were a bust. How Arizona State became the Sun Devils Katherine Chircus · Arizona Republic I was raised in a Sun Devil-supporting household — Arizona State University all the way. But before students yelled "Forks up!" maybe they were barking. In 1889, when the school was known as Tempe Normal School, the student body chose "Owls" as the mascot. The mascot later changed to "Bulldogs" after the school became Arizona State Teachers College. In 1946, the student body voted \$19 to 196 to change the mascot to the Sun Devil. As school lore goes, ASU track coach Donn Kinzle was running along the Salt River bed, saw a dust devil, and immediately thought of the Sun Devil. According to a Nov. 21, 1946, article in <i>The Arizona Republic</i>, "the student body previously had overwhelmingly approved the change," and an alumni opinion check also was said to favor the switch. The first team to appear under the Sun Devil name was the basketball team, which took on the Mesa Jaycees, an independent basketball squad. The Jaycees, according to the Nov. 21 article, were "heralded as one of the top teams in the state." In 1946, a Berk Anthony cartoon creation of Sparky became the official logo. Anthony was an ASU alum and illustrator for Disney. Rumors claim Anthony designed Sparky to look like Walt Disney, according to the university. A few years after the official mascot change, a human version of Sparky first appeared in 1951. ASU student Dick Jacobs was the first to perform as the school's hype man. He was joined by Peggy Holiday and Peggy Sparkman as the Sparkettes. At some point in the 1950s, the mascot changed from a human face to a masked figure. In 1971, the student body voted to give Sparky an update. However, some religious alumni objected to the new look, which featured prominent horns. The Republic reported that alumni even threatened to stop supporting the university financially if it was "a school which adopts such a striking resemblance of Satan" for its emblem. When the school changed Sparky's look again in 2013, the university tried to make the mascot "more cartoonish." The proposal sparked a Change.org petition and Facebook groups before the university backed down. And while the mask and look of the Sun Devil have changed over the years, and criticism of Sparky has continued, Arizona State students have remained committed to the mascot. I have never met an ASU student or alum who isn't proud to be a Sun Devil. Katherine Chircus was born and raised in Scottsdale and is a digital operations manager for <i>The Arizona Republic</i>. Send tips on Arizona history items to kfritcke@azcentral.com. Crossing the pond: Arizona State football fans embrace a rare chance to watch London game

E. Willful Infringement

142. OpenAI’s unauthorized reproduction and display of the USA TODAY Plaintiffs’ content is willful. OpenAI was intimately involved in training, fine-tuning, and otherwise testing the GPT models. OpenAI knew or should have known that these actions involved unauthorized copying of this content on a massive scale during training, resulted in the unauthorized encoding of huge numbers of such works in the models themselves, and would inevitably result in the unauthorized display of such works that the models had either memorized or would present to users in the form of LLM search results. In fact, in late 2023, before his ouster and subsequent reinstatement as OpenAI’s CEO, Sam Altman reportedly clashed with OpenAI board member Helen Toner over a paper Toner wrote criticizing the company over “safety and ethics issues related to the launches of ChatGPT and GPT-4, including regarding copyright issues.”⁴²

143. That OpenAI’s products can output copyrighted content has been the subject of widely publicized reporting that users were using ChatGPT’s Browse with Bing plug-in to circumvent paywalls and acknowledged by OpenAI on its own website.

144. The USA TODAY Plaintiffs go to great lengths to protect their content. They register copyrights in their content and provide copyright notices in connection with their works. Beyond the protections provided by the exclusive rights of reproduction, adaptation, publication, performance, and display under copyright law, the USA TODAY Publications use paywalls to protect some of their content and implement terms of service and terms of use that restrict the use of the content provided on their digital platforms. USA TODAY Co., Inc.’s terms of service, which govern each of the USA TODAY Publications’ websites, provide that, absent a written agreement, users may not “copy, reproduce, republish, upload, post, display, transmit, translate, perform, sell,

⁴² Andrew Imbrie, Owen J. Daniels & Helen Toner, *Decoding Intentions: ARTIFICIAL INTELLIGENCE AND COSTLY SIGNALS* (CTR. FOR SEC. & EMERGING TECH. Oct. 2023).

create derivative works, exploit, or distribute in any manner or medium (including by email or other electronic means) any Content from the [USA TODAY Publication's] Site.”⁴³ The Terms of Service further instruct that users may not:

cache or archive any portion of the Content (except for public search engines who create search indices solely for the inclusion of links and brief excerpts of the Content attributed to us in search results, but not for AI-generated summaries that operate as a substitute for the Content itself)

[. . .]

use our Site or any Content to develop or improve any software program, model, algorithm, machine learning or artificial intelligence (AI) system or tool (including generative AI), including without limitation for training, re-training, fine tuning, grounding, retrieval augmented generation or otherwise in connection with operating any such system or tool.

145. The USA TODAY Publications also block OpenAI's web crawlers using robots.txt. Not only do the USA TODAY Plaintiffs make clear that OpenAI is not permitted to use their content by blocking OpenAI's crawlers in their robots.txt files, but they also redirect detected AI crawlers to a landing page that makes clear: “Crawling and scraping of our site is not permitted.”

⁴³ *Terms of Service*, USA Today, <https://cm.usatoday.com/terms/> (last visited Oct. 6, 2026).

USA TODAY CO.

Attention**Content protection notice**

Crawling and scraping of our site is not permitted. If you are interested in our content, please email: distributedpartnerships@usatodayco.com to engage in a business discussion.



146. OpenAI’s general practice when crawling and scraping “did not include reviewing websites’ ... Terms of Use or Service.” OpenAI’s corporate representative testified that he was unaware of “any effort to detect paywall content in its training datasets” or “to remove paywall content from its training datasets.”⁴⁴

147. Indeed, OpenAI’s own executives directed and approved circumvention of paywalls when acquiring content. When one OpenAI employee informed Greg Brockman about “a hack to get around nytimes paywall” to assist his efforts to scrape the site, Brockman responded: “ah nice.” OpenAI’s designated corporate representative testified that OpenAI had no “method for detecting paywalled content” in its datasets.⁴⁵

148. Upon information and belief, OpenAI was aware of many examples of copyright infringement after ChatGPT products were released, some of which were widely publicized. These

⁴⁴ *In re OpenAI*, Dkt. No. 1977-1, at 9, 56.

⁴⁵ *Id.* at 56.

include multiple lawsuits (dating back to 2023) pending in this Court that allege such copyright infringement.

149. OpenAI knows a license is required—because it has paid for them to use content belonging to other news organizations. OpenAI has entered into licensing agreements with over a dozen news and media organizations, including the Associated Press, Axel Springer, The Atlantic, and Vox Media. Those agreements prove that OpenAI understands copyrighted journalism has value and that using it requires permission and payment.

150. OpenAI knew or reasonably should have known that training the GPT models on the USA TODAY Plaintiffs’ content would result in its products outputting material that infringes those works. OpenAI knows that the GPT models have the propensity to regurgitate the copyrighted material on which they were trained and that the outputs of ChatGPT include this regurgitated copyrighted material.

151. OpenAI also knew that its products were being used to elicit copyrighted content based on, *inter alia*, OpenAI’s own acknowledgment of the issue on its website and the widely publicized reporting that users were using ChatGPT’s Browse with Bing plug-in to circumvent paywalls. In March 2023, OpenAI employees internally acknowledged that ChatGPT was able to “access the content” behind a paywall, describing this as “[g]reat to avoid expensive subscriptions,” but “[n]ot great for any company that provides a subscription-based service.”⁴⁶

152. In July 2023, ChatGPT’s circumvention of paywalls became a viral topic of many conversations online, including one post on X that received 1.9M views and a Reddit thread⁴⁷ that gained 6.3K upvotes from Reddit users. Despite recognizing that the GPT models can reproduce

⁴⁶ *Id.* at 14-15.

⁴⁷ u/HOLUPREDICTIONS, *IT LOOKS LIKE YOU CAN USE CHATGPT TO BYPASS PAYWALLS*, REDDIT (JULY 2023), https://www.reddit.com/r/ChatGPT/comments/14j8q1u/it_looks_like_you_can_use_chatgpt_to_bypass/ (last visited Oct. 6, 2026).

copyrighted content and being aware that at least some of its users use the GPT-based products to do so, OpenAI continued to use copyrighted material without authorization.

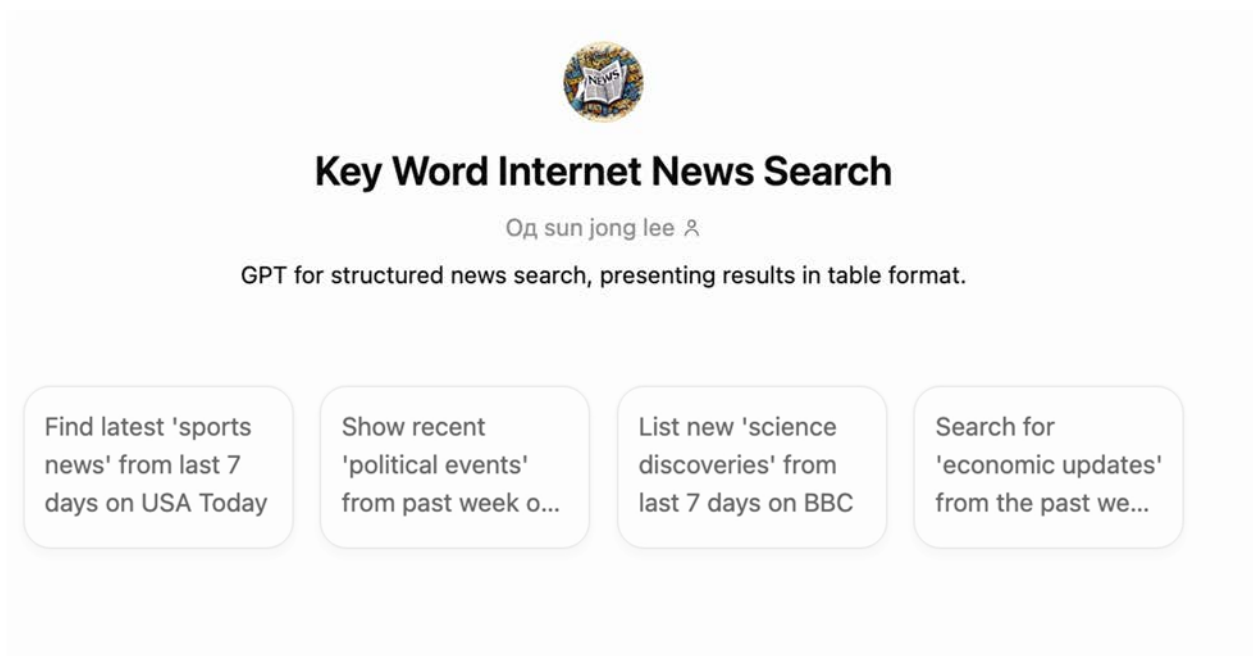
153. OpenAI was also aware of the risk that its products could be used to generate AI-generated “pink-slime” news articles—unreliable low-quality content that is often either plagiarized or remixed from legitimate news sources. OpenAI knew that its GPT models were being used to create unauthorized copies and derivatives of newspaper content on a massive scale. OpenAI’s products have made pink slime news content farms cheaper, easier to make, and harder to detect. Using OpenAI’s published API pricing, it costs roughly \$6,800 to generate one million news-style articles averaging 500 words each—requiring no human author, editor, or reporter to do so. The proliferation of GenAI pink slime news content is harmful to journalism because it undermines the business model of news publishers by diluting the market with a flood of low-quality inauthentic news material, publishing plagiarized content, and siphoning away readers and advertising money.

154. Well-publicized reporting also describes use of the GPT models to create disinformation, misinformation, or simply poor replications of newspapers’ copyrighted content on AI-generated “pink-slime” news sites.⁴⁸ OpenAI was aware of the risk of such use of the GPT models to create unauthorized copies and derivatives of newspaper content, and upon information and belief, was aware or should have been aware of the actual use of the GPT models to replicate such material.⁴⁹

⁴⁸ Jack Brewster, *How I Built an AI-Powered, Self-Running Propaganda Machine for \$105*, WALL STREET JOURNAL (Apr. 12, 2024), <https://www.wsj.com/politics/how-i-built-an-ai-powered-self-running-propaganda-machine-for-105-e9888705>; Jack Brewster, *et al.*, *The Year AI Supercharged Misinformation: NewsGuard’s 2023 in Review*, NEWSGUARD (Dec. 27, 2023), <https://www.newsguardtech.com/misinformation-monitor/december-2023/>.

⁴⁹ Sébastien Bubeck, *et al.*, *Sparks of Artificial General Intelligence: Early Experiments with GPT-4* (2023), <https://arxiv.org/pdf/2303.12712.pdf>.

155. As further evidence that OpenAI knew or reasonably should have known that end users use its GPT models to reproduce copyrighted content, OpenAI’s platform publishes or has published numerous Custom GPTs specifically designed to retrieve news content and circumvent paywalls—despite OpenAI’s representation that it “set up new systems to help review GPTs against [OpenAI’s] usage policies” and that it “continue[s] to monitor and learn how people use GPTs.”⁵⁰ One GPT hosted on OpenAI’s Platform titled “Key Word Internet News Search” encourages users to query ChatGPT to “[f]ind latest ‘sports news’ from last 7 days on USA TODAY.”



156. As additional examples, OpenAI’s GPT store has included a “Bypass Paywall” Custom GPT, designed to “[a]ccess paywalled articles easily” and a “News Summarizer Ace” Custom GPT that encourages users to “save on subscription costs” and “skip paywalls just using the link text or URL.”

⁵⁰ *Introducing GPTs*, OpenAI (Nov. 6, 2023), <https://openai.com/blog/introducing-gpts>.

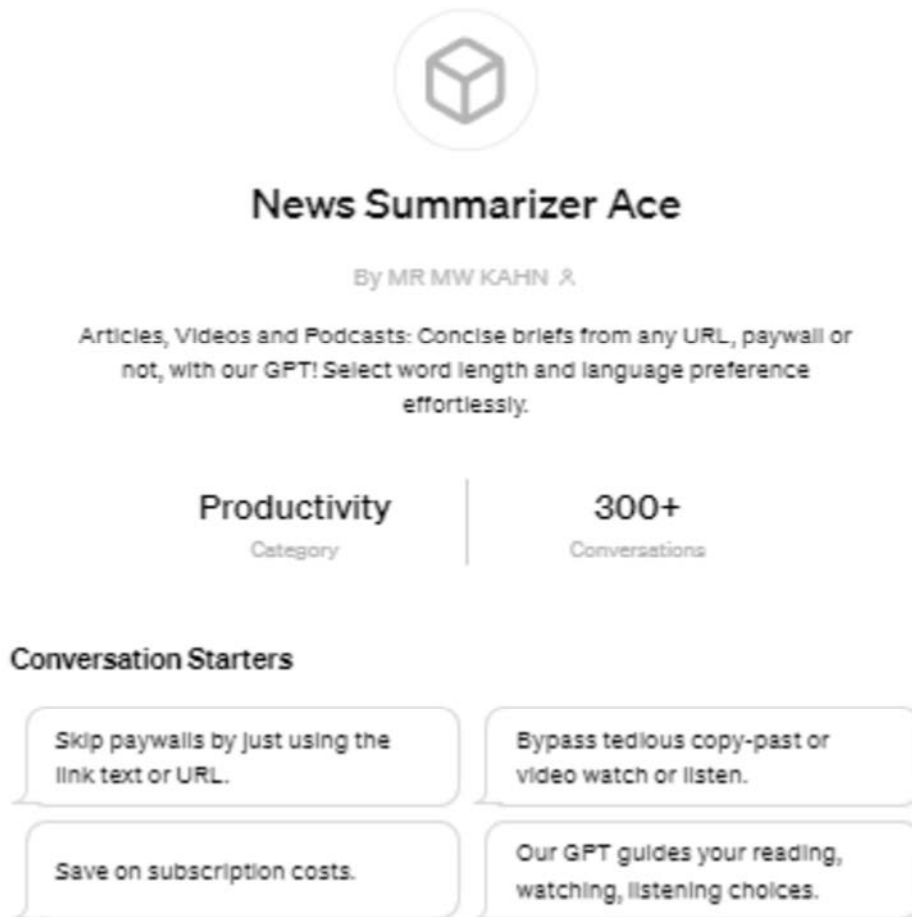


Bypass Paywall (by Paywall.vip)

By Niklas D. Palladini &

Access paywalled articles easily. Share your URL and get a Paywall.vip bypass link instantly.

Share an article
URL - I'll give
you the bypass



157. OpenAI approved and supported these Custom GPTs on its platform notwithstanding its representation that it “led the AI industry in providing a simple opt-out process for publishers . . . to prevent [its] tools from accessing their sites.”⁵¹

158. OpenAI has the ability to monitor users that infringe the rights of copyright owners such as the USA TODAY Plaintiffs. For example, in at least some instances where ChatGPT detects that a user’s query seeks to elicit output violating the OpenAI content policy, which requires that users “comply with all applicable laws,” instead of providing the requested output,

⁵¹ *OpenAI and Journalism*, OPENAI (Jan. 8, 2024), <https://openai.com/index/openai-and-journalism/>.

ChatGPT will sometimes provide a message to the user stating, “this content may violate our content policy.”

159. Not only is OpenAI capable of monitoring infringing outputs from its GPT-based products, OpenAI has the ability to terminate user accounts that request and elicit copyrighted content from the USA TODAY Plaintiffs and other rights holders. For example, in at least some instances where ChatGPT detects that a user’s query seeks to elicit output violating the OpenAI content policy, which requires that users “comply with all applicable laws,”⁵² instead of providing the requested output, ChatGPT will sometimes provide a message to the user stating, “this content may violate our content policy.”

This content may violate our [content policy](#). If you believe this to be in error, please [submit your feedback](#) — your input will aid our research in this area.

160. OpenAI’s Terms of Use provide:

We reserve the right to suspend or terminate your access to our Services or delete your account if we determine:

- o You breached these Terms or our Usage Policies.
- o We must do so to comply with the law.
- o Your use of our Services could cause risk or harm to OpenAI, our users, or anyone else.

F. OpenAI’s Removal of Copyright Management Information from the USA TODAY Plaintiffs’ Content

161. The USA TODAY Publications convey copyright management information (“CMI”) with their content. Each USA TODAY Publication conveys authors’ names, titles, and

⁵² *Terms of Use*, OpenAI, <https://openai.com/policies/terms-of-use/> (last visited Oct. 7, 2026).

publisher names with its works. For example, the following byline appears below the *USA TODAY* article titled “The NFL stokes conspiracy theories again with Super Bowl 61 graphic.”

The NFL stokes conspiracy theories again with Super Bowl 61 graphic



Joe Rivera
USA TODAY

Sept. 9, 2026, 9:08 a.m. ET

162. OpenAI intentionally removed the CMI from the USA TODAY Plaintiffs’ content in the process of scraping their content from the USA TODAY Publications’ websites, storing the content in training datasets, using the content to train the GenAI products and/or in distributing unauthorized copies of the USA TODAY Plaintiffs’ content through the operation of OpenAI’s GenAI products. OpenAI knew that by removing the USA TODAY Plaintiffs’ CMI, the CMI would not be retained within the GPT models and/or displayed when its products disseminate unauthorized copies of the USA TODAY Plaintiffs’ content to end-users, and thereby would conceal OpenAI’s own infringement as well as induce, enable, facilitate, or conceal end-users’ infringement resulting from their operation of OpenAI’s GenAI products.

163. OpenAI intentionally removed the USA TODAY Plaintiffs’ CMI from their content in one or more different ways. For example, in order to construct the datasets used to train its GenAI products, OpenAI used the “Dragnet,” “Newspaper,” and “Gutentag” content extractors that, by design, removed the CMI from this content.⁵³ These extractors target removal of CMI-related terms like “byline,” “copyright,” and “©,” particularly where those terms appeared as CMI.⁵⁴

⁵³ *In re OpenAI*, Dkt. No. 1977-1, at 77.

⁵⁴ *Id.*

164. OpenAI used the Dragnet⁵⁵ and Newspaper⁵⁶ content extractors⁵⁷ in creating the WebText dataset, which intentionally removed the CMI from content scraped from the USA TODAY Plaintiffs’ websites. Upon information and belief, OpenAI used these two extraction methods, rather than one method, to create redundancies in case one method experienced a bug or did not work properly in a given case. Applying two methods rather than one would lead to a training set that is more consistent in the kind of content it contains, which is desirable from a training perspective. The abstract of the paper describing the Dragnet content extractor states that copyright notices are removed as part of the process of extracting the text content of a website: “The goal of content extraction or boilerplate detection is to separate the main content from navigation chrome, advertising blocks, copyright notices and the like in web pages.”⁵⁸ The Newspaper content extractor operates according to instructions to separate and extract the article text on the USA TODAY Plaintiffs’ webpages while removing the CMI, including the CMI located in the footer of the webpages, which includes the terms and conditions and copyright notices.

165. Dragnet’s algorithms are designed to “separate the main article content” from other parts of the website, including “footers” and “copyright notices,” and allow the extractor to make further copies only of the “main article content.” Dragnet is also unable to extract author and title information from the header or byline and extracts it only if it happens to be separately contained in the main article content. Put differently, copies of news articles made by Dragnet are designed *not* to contain author, title, copyright notices, and footers, and do not contain such information unless it happens to be contained in the main article content.

⁵⁵ Matthew E. Peters & Dan Lecocq, *Content Extraction Using Diverse Feature Sets*, IN PROCEEDINGS OF THE 22ND INTERNATIONAL CONFERENCE ON WORLD WIDE WEB COMPANION 89 (2013).

⁵⁶ *codelucas/newspaper*, GITHUB, <https://github.com/codelucas/newspaper> (last visited Oct. 6, 2026).

⁵⁷ Radford, *et al.*, *supra* note 28, at 3.

⁵⁸ Peters & Lecocq, *supra* note 55.

166. Like Dragnet, the Newspaper algorithms are incapable of extracting copyright notices and footers. Further, a user of Newspaper has the choice to extract or not extract author and title information. On information and belief, OpenAI chose not to extract author and title information because it desired consistency with the Dragnet extractions, and Dragnet is typically unable to extract author and title information.

167. In applying the Dragnet, Newspaper, and Gutentag text extractors while assembling its training datasets, OpenAI removed the author, title, copyright notice, and terms of use information, the latter of which is contained in the footers of the USA TODAY Publications' websites.

168. The Defendants, when using Dragnet and Newspaper, first download and save the relevant webpage before extracting data from it.⁵⁹ This is at least because, when they use Dragnet and Newspaper, they likely anticipate a possible future need to regenerate the dataset (e.g., if the dataset becomes corrupted), and it is cheaper to save a copy than it is to recrawl all the data.

169. Because, by the time of its scraping, Dragnet and Newspaper were publicly known to remove author, title, copyright notices, and footers, and given that OpenAI employs highly skilled data scientists who would know how Dragnet and Newspaper work, the Defendants intentionally and knowingly removed this copyright management information while assembling their datasets.

170. Upon information and belief, OpenAI removed the CMI conveyed with the USA TODAY Plaintiffs' content when creating its other training datasets for the GPT models.

171. OpenAI distributed the USA TODAY Plaintiffs' content as output of the GenAI products knowing that the CMI originally conveyed with the USA TODAY Plaintiffs' content was

⁵⁹ *In re OpenAI*, Dkt. No. 1977-1, at 9.

removed without their permission. OpenAI did so knowing that such distribution would induce, enable, facilitate, or conceal its infringement or the infringement by an end-user of the GenAI Products. OpenAI employees have stated that they removed text that OpenAI “wouldn’t want the model to be outputting,” including “copyright notices.”⁶⁰

172. Moreover, OpenAI removed the CMI with the intent to allow end-users to claim as their own the USA TODAY Plaintiffs’ content output from the GenAI products. For example, OpenAI’s terms of use provide that end-users “own the Output” notwithstanding the fact that the output contains reproductions of the USA TODAY Plaintiffs’ content.⁶¹

173. Accordingly, OpenAI knew or should have known that removing the USA TODAY Plaintiffs’ CMI from their content, and outputting that content without the CMI, wrongfully implied that OpenAI had permission to use it, thus concealing its own infringement. OpenAI also knew or should have known that removing the CMI in this manner would induce, enable, conceal, or facilitate infringement by end-users of the GenAI products.

G. Profit to OpenAI

174. OpenAI has greatly benefited from its wrongful conduct. The financial benefits have been staggering.

175. As mentioned above, OpenAI has described itself as “the fastest technology platform to reach 10 million users, the fastest to 100 million users, and soon the fastest to 1 billion weekly active users.”

176. According to OpenAI, it has at least 900 million weekly active users. A subset of those users pays for ChatGPT Plus, for which OpenAI charges users \$20 per month. When announcing the release of ChatGPT Enterprise, a subscription-based high-capability GPT-4

⁶⁰ *Id.* at 78.

⁶¹ *Terms of Use*, *supra* note 52.

application targeted at corporate clients, in August 2023, OpenAI claimed that teams in over 92% of Fortune 500 companies were using its products.

177. OpenAI's products powered by the USA TODAY Plaintiffs' and other copyright holders' content have been massive commercial successes. As discussed above, OpenAI's founder Sam Altman anticipates annual revenues of \$100 billion by 2027 and as of March 2025, OpenAI was on pace to generate more than \$12.7 billion in revenue—more than \$1 billion per month. OpenAI's recent recapitalization valued the company at approximately \$852 billion, and the company has filed with the SEC for an initial public offering expected to generate hundreds of billions of dollars.

H. Harm to the USA TODAY Plaintiffs

178. OpenAI's massive profits stand in stark contrast to the harm its conduct has caused the USA TODAY Plaintiffs, whose content was copied without authorization to fuel that commercial success.

179. OpenAI's unlawful conduct has caused, and will continue to cause, substantial harm to the USA TODAY Plaintiffs. The content OpenAI copied in developing and deploying its models cost the USA TODAY Plaintiffs hundreds of millions of dollars to create. The USA TODAY Publications have spent those hundreds of millions of dollars and uncountable hours to gather news and information for the reports they provide to their readers. Those readers support the USA TODAY Publications by visiting their websites, purchasing their publications, and by using services offered by the USA TODAY Publications' affiliates.

180. OpenAI's illegal and unauthorized use of the USA TODAY Plaintiffs' content to train GenAI models has enabled OpenAI to create products that provide news and information plagiarized and stolen from the USA TODAY Plaintiffs. Such activity fundamentally undermines the USA TODAY Plaintiffs' business model, because it results in substitutive products. By

providing access to those substitutive products, OpenAI siphons off the USA TODAY Publications' existing and potential customers through its unlawful and uncompensated use of the USA TODAY Plaintiffs' content.

181. Indeed, as discussed above, OpenAI has publicly acknowledged that “the demand for reliable local news is already visible inside ChatGPT at a rate of about 1 million prompts per week,” with users seeking information about community events, local businesses, crime and emergency response, legislation, courts, and public policy. The USA TODAY Publications cover the same subjects in their local markets. OpenAI is now the one answering those questions, using the USA TODAY Plaintiffs' reporting without compensation.

182. OpenAI's own senior executives acknowledged that its products substitute for the news it copied. OpenAI's Head of ChatGPT, Nick Turley, wrote that publishers face an “existential threat” from OpenAI's products and that they “are largely substitutive, period” and “will get more and more substitutive as they get better.” An OpenAI software engineer wrote that “no matter how prominently we show the links, users won't click.” OpenAI Policy Director Jack Clark wrote that OpenAI's AI work will “increasingly lead to us creating systems that substitute for the labor of the people that define the ‘culture’ of society.” OpenAI internal documents characterized ChatGPT as “[t]he modern newsstand” and acknowledged that ChatGPT provides “fast, timely answers...which you would have previously needed to go to a search engine for” including “up-to-date sports scores, news, stock quotes, and more.”⁶²

183. If people are able to access the USA TODAY Plaintiffs' content through OpenAI's products without paying the USA TODAY Plaintiffs or subscribing to their products, they are likely to do so and less likely to seek this information directly from the USA TODAY Plaintiffs.

⁶² *In re OpenAI*, Dkt. No. 1977-1, at 1, 52-53, 67.

184. Additionally, the USA TODAY Plaintiffs’ business includes licensing content to other media entities and publishers, but with clear guidelines as to how the USA TODAY Plaintiffs’ content can be displayed and used. In these cases, the USA TODAY Plaintiffs are rightfully paid for the use of their work product. OpenAI’s illegal use of the USA TODAY Plaintiffs’ content undermines these arrangements by providing the USA TODAY Plaintiffs’ content directly to readers.

185. In these ways, OpenAI’s illegal use and distribution of the USA TODAY Plaintiffs’ content damages their ability to attract and retain paying subscribers while at the same time eroding their ability to engage in and maintain licensing agreements with other publishers of news and information.

186. Likewise, OpenAI’s illegal use and distribution of the USA TODAY Plaintiffs’ content damages their ability to attract and retain readers while at the same time placing their credibility and reputation at risk.

COUNT I: Copyright Infringement (17 U.S.C. § 501)

187. The USA TODAY Plaintiffs incorporate by reference and reallege the preceding allegations as though fully set forth herein.

188. The USA TODAY Plaintiffs are the owners of the registered copyrights listed in Exhibit A.

189. By illegally amassing datasets containing the USA TODAY Plaintiffs’ copyrighted works, including by scraping copies of their content from their websites and reproducing these works from third-party datasets, OpenAI directly infringed the USA TODAY Plaintiffs’ exclusive rights in their copyrighted works.

190. By exchanging copies of the USA TODAY Plaintiffs’ copyrighted works with Microsoft—including the Bing Index content transferred to OpenAI, the jointly crawled Project

Mango content, and OpenAI's delivery of its GPT-3 training dataset to Microsoft—OpenAI independently infringed the USA TODAY Plaintiffs' exclusive rights of reproduction and distribution under 17 U.S.C. § 106(1) and (3).

191. By creating training datasets and storing, processing, and reproducing the USA TODAY Plaintiffs' copyrighted works in training the GPT models, OpenAI directly infringed the USA TODAY Plaintiffs' exclusive rights in their copyrighted works.

192. By storing, processing, and reproducing the GPT models trained on the USA TODAY Plaintiffs' copyrighted works—which OpenAI designed to memorize and recognized did memorize their training data—OpenAI has directly infringed the USA TODAY Plaintiffs' exclusive rights in their copyrighted works.

193. By disseminating generative output containing copies and derivatives of the USA TODAY Plaintiffs' content through the ChatGPT offerings, OpenAI has directly infringed the USA TODAY Plaintiffs' exclusive rights in their copyrighted works.

194. On information and belief, OpenAI's infringing conduct alleged herein was and continues to be willful and carried out with full knowledge of the USA TODAY Plaintiffs' rights. As a direct result of this conduct, OpenAI has wrongfully profited from copyrighted works that it does not own.

195. By and through the actions alleged above, OpenAI has infringed and will continue to infringe the USA TODAY Plaintiffs' copyrights.

196. As a direct and proximate result of OpenAI's infringing conduct alleged herein, the USA TODAY Plaintiffs have sustained and will continue to sustain substantial, immediate, and irreparable injury for which there is no adequate remedy at law. Unless OpenAI's infringing conduct is enjoined by this Court, OpenAI has demonstrated an intent to continue to infringe the

USA TODAY Plaintiffs' copyrighted works. The USA TODAY Plaintiffs are therefore entitled to permanent injunctive relief restraining and enjoining OpenAI's ongoing infringing conduct.

197. The USA TODAY Plaintiffs are further entitled to recover statutory damages, actual damages, restitution of profits, attorneys' fees, and other remedies provided by law.

COUNT II: Vicarious Copyright Infringement

198. The USA TODAY Plaintiffs incorporate by reference and reallege the preceding allegations as though fully set forth herein.

199. OpenAI Foundation/OpenAI, Inc.; OpenAI GP, LLC; OAI Corporation/OAI Corporation, LLC; OpenAI Group PBC/OpenAI Holdings, LLC; and OpenAI Global, LLC directed, controlled, and profited from the infringement perpetrated by OpenAI OpCo, LLC/OpenAI LP and OAI International, Inc./OpenAI, LLC, including the reproduction and distribution of the USA TODAY Plaintiffs' copyrighted works.

200. OpenAI Foundation/OpenAI, Inc.; OpenAI GP, LLC; OAI Corporation/OAI Corporation, LLC; OpenAI Group PBC/OpenAI Holdings, LLC; and OpenAI Global, LLC are vicariously liable for copyright infringement.

COUNT III: Digital Millennium Copyright Act – Removal of Copyright Management Information (17 U.S.C. § 1202)

201. The USA TODAY Plaintiffs incorporate by reference and reallege the preceding allegations as though fully set forth herein.

202. The USA TODAY Plaintiffs included one or more forms of copyright-management information in their content, including: a copyright notice, authors' names, publisher's name, title and other identifying information, terms and conditions of use, and identifying numbers or symbols referring to the copyright-management information.

203. Without the USA TODAY Plaintiffs' authority, OpenAI copied their content and used it as training data for its GenAI models.

204. OpenAI removed the USA TODAY Plaintiffs' copyright-management information ("CMI") when building the training datasets containing copies of their works, including removing this information from content scraped directly from their websites and from content reproduced from third-party datasets. OpenAI used text extractors—including Dragnet, Newspaper, and Gutentag—designed to identify and remove CMI, including by targeting CMI-related terms such as "byline," "copyright," and "©."

205. OpenAI removed the USA TODAY Plaintiffs' copyright-management information in generating outputs from the GPT models containing copies or derivatives of their content.

206. By design, OpenAI's GPT-based products do not preserve any copyright-management information, and the outputs of OpenAI's GPT models removed any copyright notices, titles, and identifying information, despite the fact that those outputs were often verbatim reproductions of the USA TODAY Plaintiffs' content. Therefore, OpenAI intentionally removed copyright-management information from this content in violation of 17 U.S.C. § 1202(b)(1).

207. OpenAI's removal or alteration of the USA TODAY Plaintiffs' copyright-management information has been done knowingly and with the intent to induce, enable, facilitate, or conceal its or end-users' infringement of the USA TODAY Plaintiffs' copyrights.

208. OpenAI knew or had reasonable grounds to know that its removal of copyright-management information would facilitate copyright infringement by concealing the fact that the GPT models are infringing copyrighted works and that outputs from the GPT models are infringing copies and derivative works.

209. The USA TODAY Plaintiffs have been injured by OpenAI's removal of copyright-management information. The USA TODAY Plaintiffs are entitled to statutory damages, actual damages, restitution of profits, and other remedies provided by law, including full costs and attorneys' fees.

PRAYER FOR RELIEF

WHEREFORE, the USA TODAY Plaintiffs demand judgment against each of the Defendants, jointly and severally, as follows:

1. Awarding the USA TODAY Plaintiffs statutory damages, compensatory damages, restitution, disgorgement, and any other relief that may be permitted by law or equity;
2. Declaring that Defendants' past, present, and future use of the USA TODAY Plaintiffs' content is unlawful and infringes the USA TODAY Plaintiffs' copyrights and other lawful rights and privileges;
3. Permanently enjoining Defendants from the unlawful, unfair, and infringing conduct alleged herein;
4. Ordering destruction under 17 U.S.C. § 503(b) of all GPT or other LLM models and training sets that incorporate the USA TODAY Plaintiffs' content;
5. An award of costs, expenses, and attorneys' fees as permitted by law; and
6. Such other or further relief as the Court may deem appropriate, just, and equitable.

DEMAND FOR JURY TRIAL

The USA TODAY Plaintiffs hereby demand a jury trial for all claims so triable.

Dated: October 8, 2026

By: /s/ Steven Lieberman
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