

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOSEPH KIRCHNER,

Plaintiff,

v.

MIKE JOHNSON, et al.,

Defendants.

Civil Action No.: 1:25-cv-02735-ACR

**JOINT STIPULATION AND PROPOSED ORDER FOR LEAVE TO AMEND
COMPLAINT AND VACATE DEFENDANTS' RESPONSE DEADLINES**

Pursuant to Local Civil Rule 16.6, *pro se* Plaintiff Joseph Kirchner and Defendant OpenAI Foundation (f/k/a OpenAI, Inc., "OpenAI"), by and through undersigned counsel, hereby stipulate as follows:

WHEREAS on March 12, 2026, OpenAI sought to meet and confer with Plaintiff to pursuant to Local Civil Rule 7(m), explaining that OpenAI intended to respond to Plaintiff's Second Amended Complaint (ECF No. 13) by filing a Motion for a More Definite Statement under Fed. R. Civ. P. 12(e);

WHEREAS on March 13, 2026, Plaintiff advised that OpenAI's motion may be unnecessary because he is in the process of preparing a Third Amended Complaint and intends to seek leave to file pursuant to Fed. R. Civ. P. 15(a)(2) and Local Civil Rule 15.1 in the near term;

WHEREAS OpenAI advised that it would not oppose Plaintiff's motion for leave to file a Third Amended Complaint.

THE PARTIES HEREBY STIPULATE AND REQUEST THAT:

1. Plaintiff shall seek leave to file a Third Amended Complaint by April 29, 2026; and

2. Defendants' deadline to answer or otherwise respond to Plaintiff's Second Amended Complaint (ECF No. 13) is hereby STAYED, *sine die*.

Dated: March 18, 2026

/s/ Benjamin Margo

BENJAMIN MARGO (D.D.C. Bar No. 110445)
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/s/ Joseph Kirchner

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Pro se Plaintiff