

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ADVANCE LOCAL MEDIA LLC, ADVANCE
MAGAZINE PUBLISHERS INC. D/B/A
CONDE NAST, THE ATLANTIC MONTHLY
GROUP LLC, FORBES MEDIA LLC,
GUARDIAN NEWS & MEDIA LIMITED,
INSIDER, INC., LOS ANGELES TIMES
COMMUNICATIONS LLC, THE
MCCLATCHY COMPANY, LLC, NEWSDAY,
LLC, PLAIN DEALER PUBLISHING CO.,
POLITICO LLC, THE REPUBLICAN
COMPANY, TORONTO STAR
NEWSPAPERS LIMITED, AND VOX MEDIA,
LLC,

Plaintiffs,

v.

COHERE INC.,

Defendant.

Civil Action No. 1:25-cv-01305-CM

**NOTICE OF MOTION AND
PARTIAL MOTION TO DISMISS**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declaration of R. David Hosp, dated May 22, 2025, the undersigned hereby moves this Court on behalf of Defendant Cohere Inc., before the Honorable Colleen McMahon in Courtroom 24A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Counts II, III, and IV, and Count I, to the extent it is based on “substitutive summaries,” for failure to state a claim upon which relief can be granted.

Dated: May 22, 2025

Respectfully Submitted,

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/s/ R. David Hosp

R. David Hosp
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