UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY, **Plaintiff,** **v.** **BRAVE SOFTWARE, INC.,** **Defendant.**	**Civil Action No.** 26-cv-9549 **COMPLAINT** **JURY TRIAL DEMANDED**

Plaintiff The New York Times Company ("The Times"), by its attorneys Rothwell, Figg, Ernst & Manbeck, P.C., for its complaint against Brave Software, Inc. ("Brave"), alleges as follows:

NATURE OF THE ACTION

1. This case concerns Brave's central role in copying and distributing unlawfully acquired copyrighted content, including content scraped from The Times's websites, to its own users and other generative artificial intelligence ("GenAI") companies. Brave also offers products specifically designed to circumvent the technical measures that The Times and other content owners use to control access to their copyrighted material. Brave is the supplier, dealer, and distributor of stolen copyrighted content for its own users and many of the most prominent GenAI companies, including Anthropic, Perplexity, Mistral, xAI, and Cohere.[1] In this way,

[1] *Brave Search API*, BRAVE, https://brave.com/search/api/ (stating that the Brave API is "trusted by the world's top AI labs" including Cohere and Mistral as well as "ones it can't name") (last visited Oct. 29, 2026); *About Brave*, BRAVE, https://brave.com/about/ (stating that the Brave API is "[u]sed by some of the biggest names in AI, including Cohere, Mistral, Perplexity, and You.com") (last visited Oct. 29, 2026); *Leo—Brave's AI browser assistant that preserves users' privacy—is now available to desktop users*, BRAVE (Nov. 2, 2023),

Brave acts both like a burglar that misappropriates the content of publishers, and an AI "fence" that sells stolen content to third parties. And the third parties are serving as the knowing receivers of that stolen content, which they have used to build their trillion dollar businesses.

2. At first, Brave offered its users a search engine called "Brave Search." Unlike many companies whose search engines referred inquiries to Google Search or Microsoft Bing, Brave sought to develop an independent search capability. Brave compiled a search "index" by copying billions of websites scraped from the internet (the "Brave Index"). According to Brave, the Brave Index currently includes "over 30 billion webpages, with millions of new pages indexed each day." [2] A Brave Search user could query Brave Search, which would then provide links to websites that might include responsive information, and possibly a few words from the website for the user's reference. Brave, however, has never disclosed the name of its "bot" – *i.e.,* the software agent it uses to crawl the internet and scrape material from other companies' websites.[3] In other words, Brave crawled and copied content from the over 30 billion webpages in the Brave Index without identifying itself or providing website owners with any mechanism to block its crawler.

3. But by 2023, Brave had made little headway in the search business. So instead, Brave adopted a new business model: it decided to monetize its index of scraped web pages. It did so in at least two new ways.

4. First, Brave added to Brave Search an AI feature called "Ask Brave."[4] Ask Brave provides direct responses to users' queries by providing content published online and copied into

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https://brave.com/blog/leo-launch/ ("Anthropic used Brave's Search API to train their latest model, Claude 2, on high-quality data to help optimize Claude's outputs for retrieval augmented generation (RAG) queries.").

[2] *Brave AI*, BRAVE, https://brave.com/ai/ (last visited Oct. 30, 2026).
[3] *Brave Search Crawler*, BRAVE, https://search.brave.com/help/brave-search-crawler (last visited Oct. 30, 2026).
[4] *Introducing Ask Brave*, BRAVE (Sept. 29, 2025), https://brave.com/blog/ask-brave/.

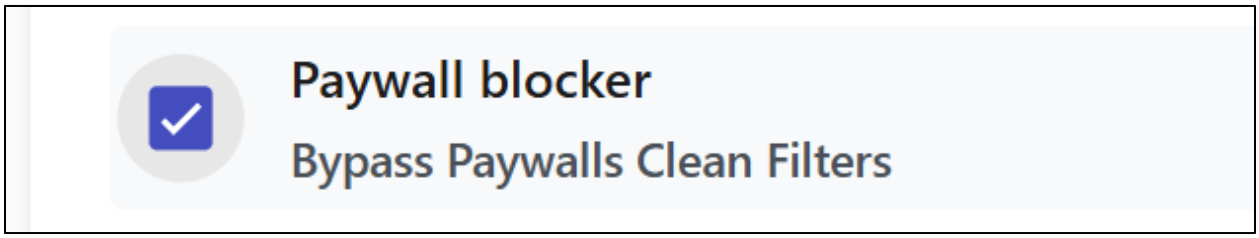
the Brave Index to a large language model ("LLM") through a process called retrieval augmented generation ("RAG"). The LLM in turn generates responses, which Brave displays to users, which often include verbatim text from and detailed summaries of the copyrighted material on that website. Brave refers to this functionality as "AI Grounding."[5]

5. Second, through its Brave Search Application Programming Interface (the "Brave API"), Brave serves as an illicit source of unlicensed copyrighted material, including Times journalism, to other AI companies. Instead of compiling their own collection of copyrighted data to use for training and RAG, which is resource-intensive, requires ongoing updates, and is a potential source of legal exposure, other AI companies pay Brave to provide them with real-time online content from the Brave Index. AI companies then use the Brave Index, with Brave's knowledge and approval, to train their own AI models, or to access content they use to respond to specific user queries (through the RAG process), or both. Further, Brave advertises and promotes certain specific use cases to attract third parties looking to use the Brave Index and the copyrighted content that Brave has scraped and copied for substitutive purposes. One substitutive use that Brave promotes is "News," which is "a specialized index of articles sourced from trusted outlets worldwide"—including The Times—that offers "access to breaking news, historical articles, and comprehensive coverage for your application."[6] Brave also promotes its "LLM Context" endpoint by explaining that it gives users direct access to the websites in the Brave Index, and it "returns extracted page chunks and source metadata in a shape and length that satisfies the needs of an LLM without need for further scraping."[7]

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[5] *Introducing AI Grounding with Brave Search API, providing enhanced search performance in AI applications*, BRAVE (Aug. 5, 2025, last updated Sept. 1, 2025), https://brave.com/blog/ai-grounding/.
[6] *News Search*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/news-search (last visited Oct. 29, 2026).
[7] *LLM Context: Web search for AI agents and chatbots*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/llm-context (last visited Oct. 29, 2026).

6. Brave also provides a third product, a web browser (the "Brave Browser"), that likewise provides copies of paywalled copyrighted content, including The Times's journalism, to users. The Brave Browser includes a default setting that, when activated, causes the browser to go behind website paywalls and provide the paywalled content to the user. The setting is called "Paywall blocker," and Brave promotes it as allowing users to "Bypass Paywalls."



7. The Brave Browser also includes "Brave News," which "is completely free to use" and provides: "Private, personalized news. From hundreds of sources. Right in your browser."[8] Brave promotes The Times (via its registered trademark, used without authorization) as one of the "hundreds of top publishers" accessible through its paywall-evading browser:[9]



[8] *Brave News*, BRAVE, https://brave.com/brave-news/ (last visited Oct. 30, 2026).
[9] Brave Software, *Brave News: Customized News Feeds & RSS*, VIMEO (Jan. 31, 2023), https://vimeo.com/794414940?fl=pl&fe=sh.

8. The Brave Browser also includes built-in ad-blocking features that remove advertisements from websites and show users Brave's own ads instead.

9. Content from The Times, including copyrighted content, features prominently in Brave's products. As shown in multiple examples provided below, a user asking Brave for the most reliable source of information on a topic will often receive information taken from a copyrighted article that appeared in The Times. Brave has never asked for The Times's permission to access its websites, much less to copy the material and provide it to users or other AI companies. On the contrary, as noted above, Brave allows its users to bypass The Times's paywalls without The Times's consent, and has taken other steps that prevent The Times from blocking Brave's access to The Times's websites. Brave has never compensated The Times for the unlawful use, copying, and distribution of The Times's copyrighted content. Indeed, Brave boasts that, unlike its major competitors, it blocks advertising that would otherwise appear on The Times's website, and instead shows its own ads, offering its users a cut of the revenue even as it deprives The Times of digital advertising revenue that helps it fund the expensive effort of producing journalism.

10. For these reasons, and others explained below, Brave occupies a niche in the AI industry from which it plays a central role in compiling, copying, and distributing unlawfully acquired copyrighted content, including content scraped from The Times's websites.

11. Brave is a direct infringer with respect to the content it scraped to compile the Brave Index and with respect to the copyrighted content it provides to users and other AI companies through its Ask Brave and Brave API services. Brave is a contributory and vicarious infringer when it deliberately induces, facilitates, controls, and profits from its users' and GenAI customers' copying of the copyrighted content. And Brave has violated the Digital Millennium

Copyright Act ("DMCA") by circumventing the technological measures that The Times and other content owners use to control access to the copyrighted material on their websites. While Brave has made more than $100 million by copying and reselling publishers' work without consent or permission, publishers have received nothing.

JURISDICTION AND VENUE

12. 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.* and the Digital Millennium Copyright Act, 17 U.S.C. § 1201 *et seq.* This Court has jurisdiction over The Times's common-law claims under 28 U.S.C. § 1332 in that Plaintiff and Defendant are citizens of different states and the amount in controversy exceeds $75,000, and under 28 U.S.C. § 1367.

13. Jurisdiction over Brave is proper because it has purposely availed itself of the privilege of conducting business in New York. In addition, a substantial portion of Brave's infringing activities and other unlawful conduct alleged herein occurred in New York, including (i) the distribution and sale of Brave's products and services to customers in New York, (ii) the unlawful theft and infringement of copyrighted content from The Times's websites, which are maintained in New York, and (iii) the unlawful circumvention of the protective measures by which The Times protects the contents of its websites. Moreover, Brave's copyright infringement and DMCA violations have caused direct and foreseeable harm to The Times and other New York-based entities, by depriving them of revenue from licensing, subscriptions, advertising, and other services offered through their websites.

14. In addition, upon information and belief, inquiries to the Brave API, one of the Brave AI products at the center of The Times's claims in this case, pass through a server located in New York City. Specifically, inquiries to the Brave API pass through a server with the IP

address 75.2.96.101. The server associated with that IP address is located in The Bronx, within the Southern District of New York.[10]

15. Upon information and belief, senior executives and other employees of Brave reside and work in New York. For example, Brave's Chief Financial Officer (Bill Engles)[11], Vice President of Sales for Global Brave Ads (Richard Rosenzweig)[12], International Growth Product Manager (Andy Andersen)[13], Senior Director of Business Development for Search API (Carlos Acevedo)[14], Senior Director of Advertising Sales (Peter Adams II)[15], Senior Technical Product Manager (Brian Fung)[16], and GTM Leader (Ben Segal)[17] are located in New York City. Upon information and belief, these employees based in New York are directly and responsibly involved in, and knowledgeable concerning, the development, implementation, maintenance, and/or promotion of the technology that Brave uses to gather and unlawfully infringe The Times's copyrighted content.

16. Upon information and belief, the individuals identified above, as well as other Brave officers and employees, promote, advertise, and market Brave's products in New York, with the intention and result that Brave contracts for the sale of services in New York. Brave's customers include companies headquartered in New York, or with offices in New York, including NYIAX. Brave regularly sponsors, exhibits at, and provides speakers for, AI-industry

[10] *IP Lookup 75.2.96.101*, BIGDATACLOUD, https://www.bigdatacloud.com/ip-lookup/75.2.96.101 (last visited Oct. 30, 2026).
[11] *Bill Engles*, LINKEDIN, https://www.linkedin.com/in/billenglesnyc/ (last visited Oct. 29, 2026).
[12] *Richard Rosenzweig*, LINKEDIN, https://www.linkedin.com/in/richardrosenzweig/ (last visited Oct. 29, 2026).
[13] *Andy Andersen*, LINKEDIN, https://www.linkedin.com/in/andyandersen1/ (last visited Oct. 29, 2026).
[14] *Carlos Acevedo*, LINKEDIN, https://www.linkedin.com/in/clacevedo/ (last visited Oct. 29, 2026).
[15] *Peter Adams II*, LINKEDIN, https://www.linkedin.com/in/padams2/ (last visited Oct. 29, 2026).
[16] *Brian Fung*, LINKEDIN, https://www.linkedin.com/in/fungbrian/ (last visited Oct. 29, 2026).
[17] *Ben Segal*, LINKEDIN, https://www.linkedin.com/in/bensegal/ (last visited Oct. 29, 2026).

events in New York City, including the AI Summit New York in 2023[18], 2024[19], and 2025[20], Permissionless IV in 2025[21], the AIE Code Summit in 2025[22], and apidays New York in 2026[23].

17. Brave's contacts with New York also include the company's "Brave Ads" program, discussed below. This program targets users in New York, and as of October 30, 2026, Brave reported 10 active ad campaigns underway in New York State.[24]

18. Based on the foregoing, venue is proper in this District under 28 U.S.C. § 1400(a) because Brave is subject to the personal jurisdiction of this Court with respect to the claims at issue in this case, and therefore Brave is deemed to reside in this District. Venue is also proper under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to The Times's claims occurred in this District, including the marketing, sale, and licensing of Brave's AI products that were built on the infringement of The Times's intellectual property, which is situated within this District. Brave has offered and sold its services to New York residents, and Brave enjoys a substantial base of active users in New York.

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[18] Brave, *Jan Piotrowski, VP and Head of Search Business for Brave, will be on stage at The AI Summit New York next week!,* LINKEDIN (Dec. 1, 2023), https://www.linkedin.com/posts/aisummit-artificialintelligence-share-7136356020787777536-YS0L/.

[19] *2024 Speakers*, THE AI SUMMIT NEW YORK 2024, https://web.archive.org/web/20241210113542/https:/newyork.theaisummit.com/conference-speakers (archived Dec. 10, 2024); *Exhibitors - Brave Software*, THE AI SUMMIT NEW YORK 2024, https://web.archive.org/web/20241210123003/https:/newyork.theaisummit.com/exhibitors/brave-software (archived Dec. 10, 2024).

[20] Brave, *Thank you to everyone who stopped by our booth at AI Summit NYC last week!*, LINKEDIN (Dec. 19, 2025), https://www.linkedin.com/posts/thank-you-to-everyone-who-stopped-by-our-ugcPost-7407862626418085888-cxV9/; Brave, Repost of *Creating a popup podcast studio on a conference show floor? GENIUS!*, LINKEDIN (Dec. 16, 2025), https://lnkd.in/p/eYWNW8NE.

[21] Brave, *Brave Co-Founder and CEO Brendan Eich will be speaking at Permissionless IV this week in NYC!*, LINKEDIN (June 24, 2025), https://www.linkedin.com/posts/brave-co-founder-and-ceo-brendan-eich-will-share-7343353991797387266-h6HP/.

[22] Brave, Comment to *CV is powering the Official Hackathon for the AIE Code Summit this weekend in NYC!*, LINKEDIN (Nov. 18, 2025), https://lnkd.in/p/eHMBwr7j.

[23] Brave, Repost of *Thank you to Brave, Silver Sponsor of apidays New York 2026*, LINKEDIN (Apr. 20, 2026), https://lnkd.in/p/eGmGjQVp.

[24] *Transparency Data Feed: Brave Browser Stats & Rewards/BAT Activity*, BRAVE, https://brave.com/transparency/ (last visited Oct. 30, 2026).

THE PARTIES

19. The Times is a New York corporation with its headquarters and principal place of business in New York. The Times publishes digital and print products, including its core news product *The New York Times*, which is available on its mobile applications, on its website (NYTimes.com), and as a printed newspaper. The Times also publishes other interest-specific publications including *The Athletic* (sports media), *Cooking* (recipes and other cooking-related content), *Games* (puzzles and games), and *Wirecutter* (shopping recommendations). The Times owns over 10 million registered, copyrighted works, including those set forth in Exhibit A ("Times Content").

20. Brave is a closely held Delaware corporation with its principal place of business in San Francisco, California.

FACTUAL ALLEGATIONS

I. The New York Times and Its Mission

A. 175 Years of High-Quality, Original, Independent Journalism

21. The New York Times is a trusted source of quality, independent journalism whose mission is to seek the truth and help people understand the world. Begun as a small, local newspaper, The Times has evolved into a diversified multi-media company with millions of readers, listeners, and viewers around the globe. As of June 30, 2026, more than 13 million subscribers pay for Times journalism, which includes everything from news to opinion, culture to business, cooking to games, and shopping recommendations to sports.

22. Founded in 1851, The New York Times has a long history of providing the public with independent journalism of the highest quality. When Adolph Ochs bought the newspaper out of bankruptcy in 1896, he vowed that The Times would be fiercely independent, dedicated to journalism of the highest integrity, and devoted to the public welfare. He articulated his objective

as follows: "To give the news impartially, without fear or favor, regardless of any party, sect, or interest involved." These words still animate The New York Times today, nearly two centuries later.

23. Producing original independent journalism is at the heart of this mission. Times journalists cover the most important stories across the globe; in a typical year, The Times sends journalists to report on the ground from more than 150 countries, including more than 30 international bureaus. Together, along with editors, photographers, audio producers, videographers, graphic designers, data analysts, and more, The Times's newsroom produces groundbreaking journalism across every major storytelling format.

24. The quality of The Times's coverage has been widely recognized with many industry and peer accolades, including 149 Pulitzer Prizes since its first Pulitzer award in 1918 (nearly twice as many as any other organization). The Times's journalism is also deeply impactful. Academics, teachers, and scientists have used it to educate and innovate. Lawmakers have cited it to introduce legislation. Judges have referenced it in rulings. And tens of millions of people rely on it every day.

25. Times journalists are experts in their subject matter and among the most experienced and talented in the industry. In some cases, their work is enhanced by professional expertise: lawyers cover the courts, medical experts cover health care, and veterans cover the military. Many Times journalists draw on decades of experience. In addition to journalists who spend considerable time and effort reporting pieces, The Times employs hundreds of editors working to ensure the accuracy, independence, and fairness of its journalism, with at least two editors reviewing every significant article prior to publication and many more reviewing the most important and sensitive pieces. The Times has among the largest and most robust Standards

teams in the industry, which advise the newsroom daily on consistency, accuracy, fairness, and clarity in its reporting and maintain stringent ethical guidelines for journalists and their work. The Times also maintains an internal Stylebook, a document that is updated over time to guide the tone of its journalism and the prose used. There is also an ongoing dialogue among journalists and editors to ensure The Times fairly and thoroughly covers the right stories and presents what it finds in a clear and compelling way. Producing Times journalism is a creative and deeply human endeavor.

B. In-Depth Journalism and Breaking News at Great Cost

26. To produce its world-class journalism, The Times invests an enormous amount of time, money, expertise, and talent, both in its newsroom and in its product, technology, and supporting teams. Core areas of focus include:

27. Investigative Reporting. The Times undertakes deep investigations—which may take months and sometimes years to report and produce—into complex and important areas of public interest. The Times's reporters routinely uncover stories that would otherwise never come to light. Through its journalism, The Times has held power to account and brought public attention to important issues. In investigating these areas, Times coverage often results in meaningful reforms. These stories are written and edited in the style that is widely associated with The Times, one that readers trust and seek out.

28. Breaking News Reporting. The Times reports major news as it breaks. In an era in which speculation, disinformation, and spin often drown out the truth when news breaks, The Times fills an important need for trustworthy news with journalists who have the subject-matter expertise, news judgment, and sources required to report the facts in a compelling way. This year, The Times has provided detailed, real-time coverage of breaking news across a range of

topics, including foreign and domestic politics, a government shutdown, wars in Ukraine and the Middle East, and a spate of natural disasters around the globe.

29. Beat Reporting. The Times invests significantly in its beat reporting, giving its reporters the time and space to delve into topics. These topics span from public health to religion to architecture, and from the Pentagon to Hollywood to Wall Street. They also include The Times's dozens of national and international bureaus, where correspondents are steeped in the communities they cover. Because this type of journalism is grounded in the expertise and deep connections of Times journalists, beat coverage enriches The Times's reporting.

30. Reviews and Analysis. The Times is a trusted source for reviews and analysis of arts and culture, including food, books, art, film, theater, television, music, fashion, and travel. In 2016, it acquired the product review site Wirecutter, which recommends the best products in dozens of categories including home goods, technology, health and fitness, and more. Each year, Wirecutter spends tens of thousands of hours conducting rigorous testing and research to produce a catalog of reviews that today covers thousands of products.

31. Commentary and Opinion. The Times publishes opinion articles that contribute to public debate across the world. Many of these articles come from The Times's staff of world-renowned columnists. Additionally, leaders in business, politics, religion, education, and the arts write guest essays for The Times's opinion section, giving readers the opportunity to understand a wide range of experiences, perspectives, and ideas about the most important issues of the day.

32. Sports Reporting. The Athletic was founded in 2016 and is a digital publication that provides unrivaled sports journalism for fans across major sports leagues and teams throughout the United States and the world. With a newsroom of more than 500 (including full-time writers, editors and producers), The Athletic delivers in-depth coverage of hundreds of

professional and college teams across the major sports leagues globally. As a recognized leader in sports journalism, The Athletic serves avid sports fans who value expert-informed analysis and in-depth insights that they cannot find anywhere else.

C. A Commitment to Quality Journalism

33. It takes enormous resources to publish, on average, more than 300 original articles every day, along with more than 100 email newsletters and more than a dozen audio and video shows in active production. Many of these editorial projects take months—or longer—to create. That output is the work of approximately 6,000 full-time equivalent Times employees (as of December 31, 2025), some 3,000 of whom are directly involved in The Times's journalism operations.

34. Quite often, the most vital news reporting for society is the most resource-intensive. Some of The Times's most important journalism requires deploying teams of journalists at great cost to report on the ground around the world, providing best-in-class security and support, filing lawsuits against government entities to bring information to light, and supporting journalists through investigations that can take months or years.

35. Subscription, advertising, licensing, and affiliate revenue—primarily generated through direct engagement with audiences—make all of this reporting possible. In 1996, The Times launched a core news website, alongside its paid print edition. As readers shifted from print news to digital products, The Times—like most print publishers—faced the prospect of being unable to continue funding its journalism. In response, The Times reinvented its business model to incorporate digital subscriptions. The Times launched its metered paywall in 2011, in what it called "a bet that readers will pay for news they are accustomed to getting free."[25]

[25] Jeremy W. Peters, *The Times Announces Digital Subscription Plan*, N.Y. TIMES (Mar. 17, 2011), https://www.nytimes.com/2011/03/18/business/media/18times.html.

36. Thanks to the quality of The Times's journalism, that strategic innovation paid off, which allowed The Times to continue to exist and to thrive. Today, the vast majority of subscribers are digital-only. In the 15 years since The Times launched its paywall, it has grown its paid digital subscribership and developed a direct relationship with its broader online audience through its tireless commitment to making journalism "worth paying for." Generating and maintaining direct traffic to its online content and mobile applications are critical components of The Times's financial success.

37. By the third quarter of 2025, The Times had approximately 12.3 million digital and print subscribers worldwide, and over 150 million registered users.

38. The Times makes journalism "worth paying for" by publishing articles that are exhaustively researched and reported, thoughtfully written, carefully edited, and thoroughly fact-checked.

39. In addition, The Times has deepened its relationship with its readers by expanding its offerings to better encompass its readers' specific interests, including best-in-class products like Cooking, Wirecutter, Games, and The Athletic.

40. The Times does not require payment for all access to Times Content. To serve the public, and to help build audience engagement and loyalty, The Times offers its home page and certain articles, newsletters, podcasts, games, recipes, product reviews, and videos to the public without charging a fee. In addition, The Times generally offers access to a limited number of articles and other content to users who create registered accounts before requiring them to subscribe for access to additional content. Approximately 50 to 100 million users, on average, engage with The Times's online content each week. This traffic is a key source of advertising

revenue, deepens subscribers' relationship with The Times, and helps drive future subscriptions to The Times.

41. The Times has also compiled digital archives of all its material going back to its founding, at significant cost. Its digital archives include The New York Times Article Archive, with partial and full-text digital versions of articles from 1851 to today, and the TimesMachine, a browser-based digital replica of all issues from 1851 to 2002. This represents a singular database of contemporaneous language and information, as well as a unique and valuable historical record.

D. Brave's Products Threaten High-Quality Journalism

42. Delivering great journalism is harder than ever. Over the past two decades, the traditional business models that supported quality journalism have collapsed, forcing the shuttering of newspapers all over the country. It has become more difficult for the public to sort fact from fiction in today's information ecosystem, as misinformation floods the internet, television, and other media. If The Times and other news organizations cannot produce and protect their original journalism–especially news reporting–there will be a vacuum that no computer or AI can fill.

43. The protection of The Times's intellectual property is critical to its continued ability to fund world-class journalism in the public interest. When The Times and its peers cannot control the use of their content, their ability to monetize that content is harmed. With less revenue, news organizations will have fewer journalists able to dedicate time and resources to important, in-depth stories—creating the real risk that those stories will go untold. Less journalism will be produced, and the cost to society will be enormous.

44. The Times depends on its exclusive rights of reproduction, adaptation, publication, performance, and display under copyright law to operate. And because its content is

so valuable, The Times invests significant resources in protecting it. The Times has registered the copyright in its print edition every day for over 100 years, registers its website daily, maintains a paywall, has implemented terms of service for its website and API that set limits on the copying and use of its content, employs technical content protection measures, and enforces its rights through legal measures like takedown requests under the Digital Millennium Copyright Act ("DMCA") and cease and desist letters to put third parties on notice of their violations.

45. The Times, and the law, require that third parties obtain permission before using Times Content and trademarks for commercial purposes, and for decades, The Times has licensed its content under negotiated licensing agreements. These agreements help ensure that The Times controls how, where, and for how long its content and brand appear and ensure that it receives fair compensation for third-party use. Third parties, including large tech platforms, pay The Times significant fees under these agreements in exchange for the right to use Times Content for narrowly defined purposes, and uses beyond those authorized purposes are prohibited.

46. Content from The Times's websites is also available for license for certain uses through the Copyright Clearance Center ("CCC"), a clearinghouse that licenses material to both corporate and academic users. Through the CCC, The Times permits limited licenses for instructional, academic, and other nonprofit uses, and limited commercial uses. For example, a for-profit business can acquire a CCC license to make a photocopy of Times Content for internal or external distribution in exchange for a licensing fee of about 10 dollars per article. A CCC license to post a single Times article on a commercial website for up to a year costs several thousand dollars.

47. The Times's ability to continue to attract and grow its subscriber base and to generate subscription, advertising, licensing, and affiliate revenue depends on the size of The Times's audience and users' sustained engagement directly with The Times's website, newspaper, and mobile applications. To facilitate this direct engagement with its products, The Times permits certain search engines to access and index its content, which is a condition of participating in search. In exchange, search engines have historically surfaced links and limited snippets to direct users to The Times's own websites and mobile applications, rather than fully exploit Times Content to keep users within their own search ecosystem.

48. While The Times, like virtually all online publishers, permits search engines to access its content for the limited purpose of surfacing it in traditional search results, The Times has never given permission to Brave to use its content for AI purposes—or any other purpose. Nor has The Times authorized any third party to license its content to Brave for AI or other purposes. For the avoidance of doubt, Brave is not an authorized licensee of The Times.

49. On the contrary, The Times has communicated to Brave repeatedly that it did not have permission to use material from The Times's websites, expressly objected to Brave's infringement of The Times's copyrights, and demanded that Brave stop. On August 11, 2025, The Times's intellectual property counsel, Carl Mazurek, sent a letter to Brave's CEO, Brendan Eich, in which The Times stated that, without The Times's permission, "Brave's products and services output summaries of, and verbatim language from, The Times's content." Among other things, The Times asked that Brave:

- Cease and desist all current and future unauthorized access to The Times's platforms (including its websites and mobile applications);

• Cease and desist from all unauthorized use of The Times's content and marks, including but not limited to copying, reproducing or using The Times's content and marks, and/or modifying The Times's content in connection with its AI products; and

• Remove all intellectual property belonging to The Times from its products.

Despite The Times's specific request that Brave respond to the letter, Brave ignored it.

50. The Times's outside counsel sent a second letter to Mr. Eich on April 13, 2026. That letter referred again to the fact that "The Times discovered that Brave used, and continues to use, The Times's content without authorization to power Brave's AI products, which output summaries of, and verbatim language from, The Times's content. Brave's conduct violates the applicable law and, by using Times journalism to offer substitutive outputs directly to Brave's users, harms The Times and the market for its content. This is not defensible under the limited doctrine of fair use." The letter further explained that "Brave's failure to respond to the August 2025 Letter and its continuing, egregious infringement demonstrate reckless disregard for The Times's rights and constitute willful infringement, warranting enhanced statutory damages up to $150,000 per infringement." The letter repeated The Times's demand that Brave cease and desist from its unlawful conduct. Again, Brave ignored the letter.

II. Brave and Its Products

A. Brave

51. Brave was founded in 2015 by Brendan Eich and Brian Bondy. It remains a closely held company, and one of its self-professed selling points is its purported attention to users' privacy. The company cites its purported concern for users' privacy as a shield against scrutiny of its own activities, and detailed information on the company's operations is not readily available. Third-party sources report that early investors in Brave include, in addition to Eich and Bondy, Peter Thiel (through his capital firm, Founders Fund), Pantera Capital, Digital

Currency Group, Foundation Capital and Propel Venture Partners. Third-party reports state that Brave's 2025 revenue passed $100 million, up from about $52 million in 2024. As of September 30, 2026, the Brave Browser had close to 130 million monthly users and over 50 million daily users.[26] Brave Search answers more than 50 million queries per day, and a third of those queries lead to an AI generated response.[27] According to a February 2026 blog post, the Brave API handles billions of API calls weekly,[28] meaning that Brave's use by other GenAI companies far exceeds that of individual users.

52. Brave created a search engine, which it called "Brave Search." To develop an index for a search engine, a company deploys a software agent (a crawler or bot) to browse the internet, and then scrapes content from websites. That content is then stored in a central database (the index), so that the search engine can retrieve and display links to the relevant pages in search results when a user asks for information. These functions allow search engines to organize and categorize web pages in a way that makes them easily searchable.

53. In 2023, Brave started offering a generative AI ("GenAI") feature called "Summarizer" via Brave Search. In 2025, Brave updated "Summarizer" and renamed it "Ask Brave," which is currently available through Brave's website (brave.com) or its app. Ask Brave no longer provides users with just a list of links to relevant websites in the Brave Index. Instead, it provides users of Brave Search with results that contain answers to user queries. These answers are written by an AI-powered feature that summarizes, and often incorporates verbatim, third-party content.

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[26] *Transparency Data Feed: Brave Browser Stats & Rewards/BAT Activity*, BRAVE, https://brave.com/transparency/ (last visited Oct. 30, 2026).
[27] *Brave AI,* BRAVE, https://brave.com/ai/ (last visited Oct. 30, 2026).
[28] *The Brave Search API shows exponential growth, emerging as the best search tool to power AI apps*, BRAVE (Feb. 24, 2026), https://brave.com/blog/search-api-growth/.

54. Brave also developed a separate suite of services called Brave API, which can be used both by individuals and by third-party AI companies. Brave uses this technology to make additional copies of, and to distribute, through the Brave Index, the copyrighted content on websites (including those behind paywalls) that Brave has copied into that index.

B. Brave's Products

55. Brave's products either include features powered by Large Language Models ("LLMs") or serve as components for developing and operating LLMs. LLMs are a type of AI system that generates expressive language resulting in text or other data, rather than just analyzing existing data. LLMs work by predicting words that are likely to follow a given string of text based on the content used to train them. They use algorithms to weigh the relevance of different parts of the input data (*e.g.,* a user's inquiry) when generating text. LLM operators "train" their models on vast datasets of written material, allowing them to encode patterns and relationships between words and sentences.

56. Once trained, LLMs can generate text by taking a seed input (again, for example, a user's inquiry) and iteratively predicting the most likely next word based on the patterns they have learned. Through this process, LLMs can generate answers to questions about content that is included in their training data.

57. LLMs are also capable of copying content from a search index like the Brave Index or other sources as input, then outputting, excerpting, summarizing, or answering questions about that content. For example, LLMs may also be deployed in conjunction with a technique called "retrieval augmented generation" ("RAG"), also known as "grounding," "retrieving," or "contextualizing." Through RAG, trained LLMs may be provided with information specific to a use case or subject matter in order to "ground" their outputs. 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, a GenAI product based on an LLM will: (1) receive an input, such as a prompt; (2) retrieve relevant content related to the input prior to generating a response; (3) combine the original input with the retrieved documents; and (4) provide the combined content to an LLM, which generates a response.

58. Brave's RAG process involves copying, distributing, and displaying high-quality, expressive, engaging, fact-checked content like that of The Times. Brave's AI products depend on material, including journalism, that human beings report, research, write, edit, and create. As explained further below, Brave copies and distributes that content without permission or compensation on a massive scale.

1. Ask Brave

59. One of Brave's GenAI products is Ask Brave, which is embedded in Brave's search engine, Brave Search. According to Brave, Ask Brave "brings a single interface that consolidates both search and AI chat. Ask Brave provides comprehensive answers to any question, plus other actionable elements–such as videos, webpages, and products–at the click (or tap) of a button."[29]

60. Unlike traditional search engines that provide "ten blue links" in response to queries, Ask Brave provides "comprehensive answers to any question."[30] That is, instead of directing users to publishers' websites, Ask Brave copies those websites to provide "longer, more detailed answers, the ability to follow up using chat, as well as Deep Research Mode," as well as "contextually relevant enrichments such as videos, news articles, products business, shopping, and more—right when and where you need them."[31]

[29] *What's new in Brave*, BRAVE, https://brave.com/whats-new/ (last visited Oct. 30, 2026).
[30] *Introducing Ask Brave*, BRAVE (Sept. 29, 2025), https://brave.com/blog/ask-brave/.
[31] *AI in Brave Search*, BRAVE SEARCH HELP, https://search.brave.com/help/ai (last visited Oct. 30, 2026).

2. The Brave API

61. Brave offers another suite of services through its "Brave API," primarily targeted to Brave's corporate customers (though individual users are also able to use it). The Brave API acts as a bridge between a company's software and an AI model. Among other things, the Brave API provides these companies with copies of content from the Brave Index for use in training their own AI models and for grounding responses to queries. In fact, Brave expressly markets the Brave API to be used for "training and grounding" LLMs, which it explains are the product's "most common uses":

> The Brave Search API is an open-ended product with many possible uses (just as people have many possible uses for search engines, and apply that breadth to software development). The most common uses today are in training and grounding several of the Web's biggest large language models (LLM), in addition to powering popular AI apps. This is likely to continue to be the primary use case for the Brave Search API, as an increasing number of AI agents operate in the wild who, like humans, thrive when given access to the open Web.[32]

62. According to Brave, the Brave API "enabl[es] agents to answer questions about current events, research market trends, and retrieve and source documentation with higher accuracy and reduced hallucinations."[33] The Brave API services "most of the top 10 AI LLMs with real-time Web search data,"[34] including "Cohere, Mistral, Perplexity, and You.com."[35] Meta (parent of Facebook, Instagram, and others) trained its Llama 3 model to use the Brave API "to answer questions about recent events that go beyond its knowledge cutoff or that require

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[32] *How does the Brave Search API compare to other Web search API options?*, BRAVE (Sept. 22, 2023), https://brave.com/search/api/guides/what-sets-brave-search-api-apart/ (highlighting added).
[33] *The Brave Search API's integration into Snowflake enables agentic web search for enterprise customers*, BRAVE (Feb. 3, 2026), https://brave.com/blog/snowflake/.
[34] *The Brave Search API's integration into Snowflake enables agentic web search for enterprise customers*, BRAVE (Feb. 3, 2026), https://brave.com/blog/snowflake/.
[35] *About Brave*, BRAVE, https://brave.com/about/ (last visited Oct. 29, 2026).

retrieving a particular piece of information from the web."[36] Anthropic also "used Brave's Search API to train their latest model, Claude 2, on high-quality data to help optimize Claude's outputs for retrieval augmented generation (RAG) queries."[37]

63. The Brave API includes specific "endpoints" (*i.e.*, categories of content). One of the endpoints is "News Search."[38] According to Brave, News Search "is perfect for":

- **News Aggregation**: Build news applications and aggregators with real-time content
- **Media Monitoring**: Track news mentions, brand coverage, and industry trends
- **Current Events Analysis**: Monitor breaking news and emerging stories
- **Content Discovery**: Find news articles for research and content curation
- **Historical News Research**: Access archived news articles with date filtering[39]

64. The News Search function also provides Brave's customers with "up to 5 additional excerpts per search result, giving you more context and alternative perspectives from each article."[40]

65. The Brave API also includes an endpoint called "LLM Context." According to Brave, the key feature of this endpoint is that it provides more content copied from the targeted websites: "Traditional Web Search returns titles and short snippets for a results page. LLM Context returns extracted page chunks and source metadata in a shape and length that satisfies

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[36] LLAMA TEAM, AI @ META, THE LLAMA 3 HERD OF MODELS, at 24 (July 23, 2024), https://arxiv.org/pdf/2407.21783v3.

[37] *Leo—Brave's AI browser assistant that preserves users' privacy—is now available to desktop users*, BRAVE (Nov. 2, 2023), https://brave.com/blog/leo-launch/.

[38] *News Search*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/news-search (last visited Oct. 29, 2026).

[39] *News Search*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/news-search (last visited Oct. 29, 2026) (highlighting added).

[40] *News Search*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/news-search (last visited Oct. 29, 2026).

the needs of an LLM without need for further scraping."[41] Brave does not hide the fact that the central feature of this service is to copy and provide Brave's customers the content of a website. According to Brave, one of the "use cases" for LLM Context is "extracting text."[42] Brave also states:

> LLM Context is perfect for:
>
> - **AI Agents**: Give your agent a Web search tool that returns ready-to-use content in a single call
> - **RAG Pipelines**: Ground LLM responses in fresh, relevant Web content
> - **AI assistants & chatbots**: Provide factual answers backed by real sources
> - **Question answering**: Retrieve focused context for specific queries
> - **Fact checking**: Verify claims against current Web content
> - **Content research**: Gather source material on any topic with one API call[43]

66. The LLM Context endpoint also offers "actual page content (text, tables, code) ready for LLM consumption – no scraping needed."[44]

67. The Brave API also includes an endpoint called "Web Search" which according to Brave "provides access to [its] comprehensive index of web pages, enabling you to retrieve relevant results from across the internet."[45] The Web Search endpoint also provides Brave's customers with "5 additional excerpts per search result, giving you more context from each web

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[41] *LLM Context: Web search for AI agents and chatbots*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/llm-context (last visited Oct. 29, 2026).
[42] *LLM Context: Web search for AI agents and chatbots*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/llm-context (last visited Oct. 29, 2026).
[43] *LLM Context: Web search for AI agents and chatbots*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/llm-context (last visited Oct. 29, 2026) (highlighting added).
[44] *LLM Context: Web search for AI agents and chatbots*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/llm-context (last visited Oct. 29, 2026).
[45] *Web Search*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/web-search (last visited Oct. 30, 2026).

page" which Brave advertises as being useful for "[c]omprehensive content preview before clicking through."[46]

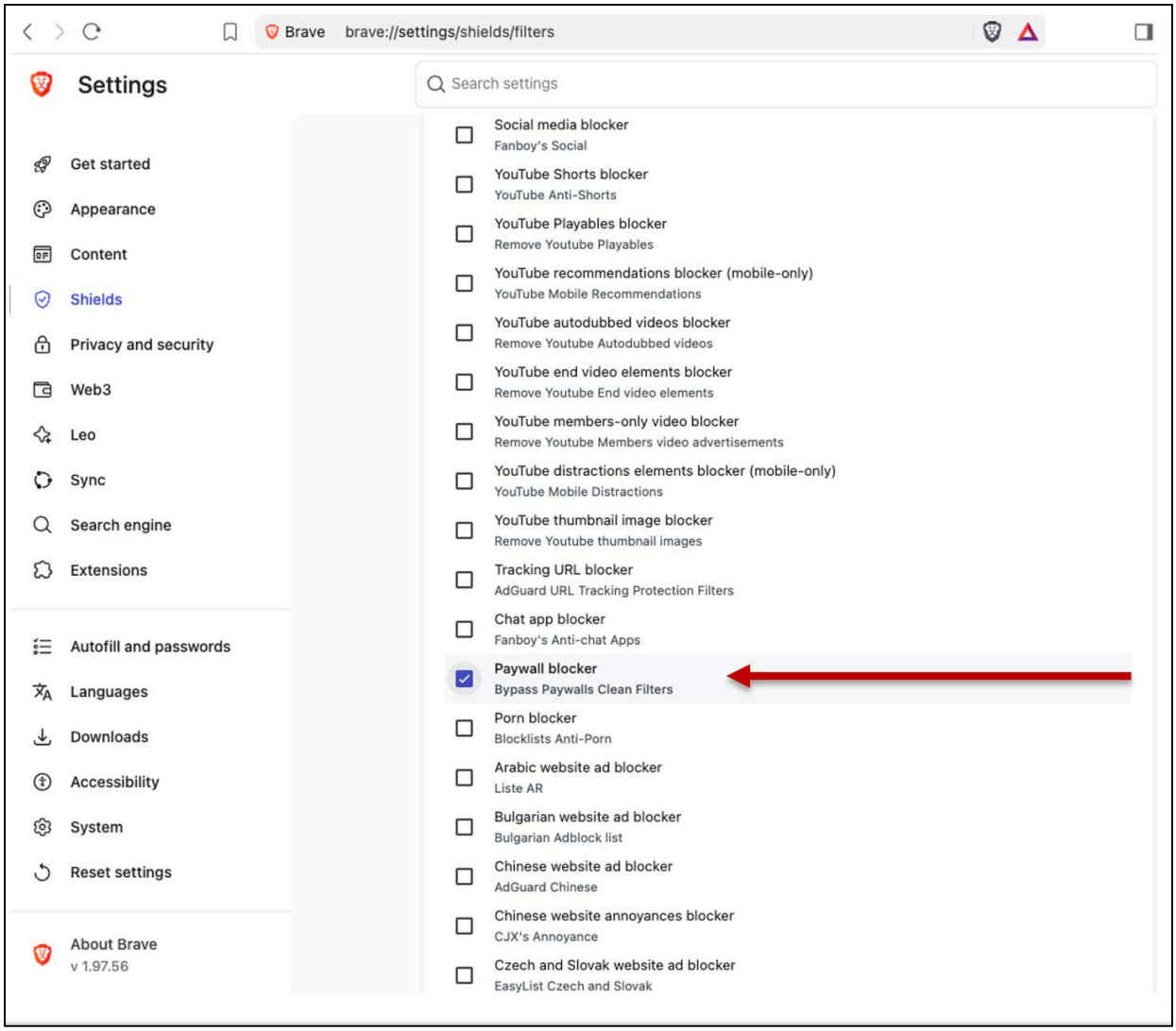
68. The Brave API also includes an endpoint called "Answers" which provides LLM-generated responses grounded using content from the Brave Index.[47] The "Answers" endpoint is the same service that powers the Ask Brave product.[48]

3. The Brave Browser

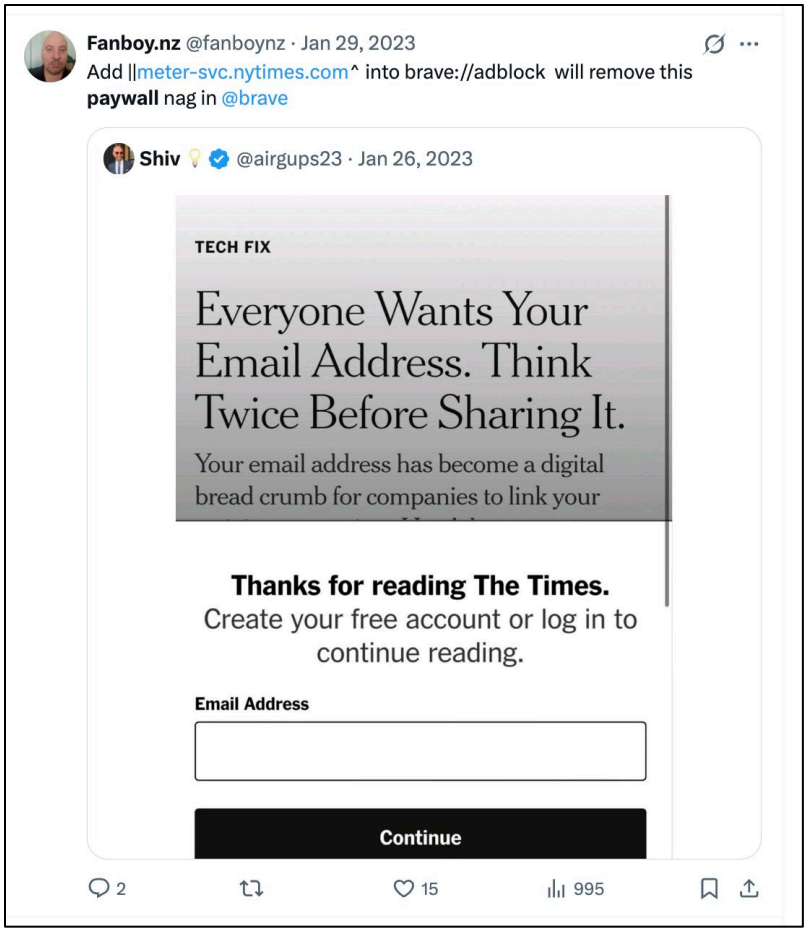
69. Brave also provides a browser, the Brave Browser, through which Brave delivers The Times's copyrighted, paywalled content to its users without a subscription. The Brave Browser also includes Brave Leo, a built-in AI assistant that can "summarize a webpage" and "create content like articles," among other tasks.[49]

70. The Brave Browser includes a setting that, when activated, causes the browser to go behind website paywalls and deliver the shielded content to the user. The setting is called "Paywall blocker," and Brave describes it as allowing users to "Bypass Paywalls." The following screenshot shows the "Paywall blocker" setting in the Brave Browser.

[46] *Web Search*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/web-search (last visited Oct. 30, 2026).
[47] *Answers*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/answers (last visited Oct. 30, 2026).
[48] *Answers*, BRAVE SEARCH API, https://api-dashboard.search.brave.com/documentation/services/answers (last visited Oct. 30, 2026).
[49] *Brave Leo AI*, BRAVE, https://brave.com/leo/ (last visited Oct. 30, 2026).



71. Brave's employees refer to The Times's requirement that website visitors register or subscribe to The Times in order to consume its copyrighted content as "paywall nag." A Brave engineer advertised on social media that Brave users could employ its Adblock feature to circumvent The Times's "paywall nag."

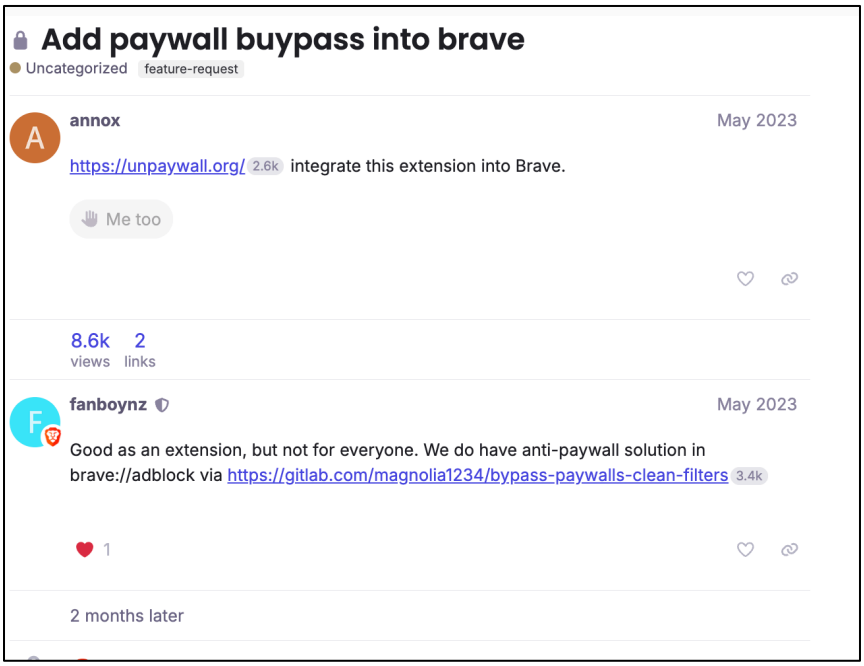




72. Users have commented on the ease with which they can use the Brave Browser's paywall blocker to bypass The Times's paywall to access its copyrighted content without registering or subscribing. As one user commented in a Reddit thread captioned "Paywall Blocker in Brave": "Today I scrolled down a bit and noticed a Paywall Blocker filter. I switched it on, headed over to the New York Times, and OOH LA LA the paywall had gone. I can now

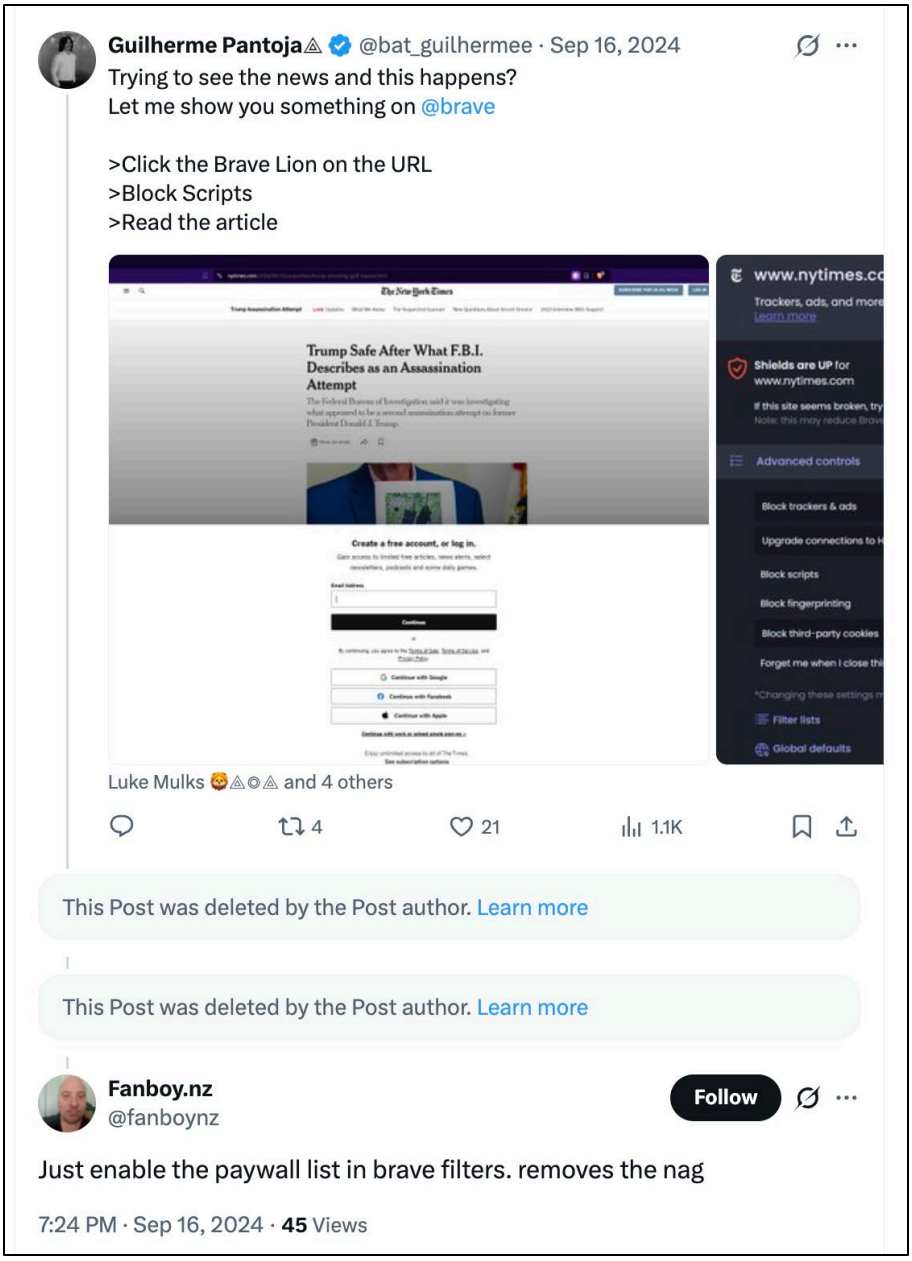
read the NYT without interruption and without needing to set up an account."[50] That same user later in the thread noted that they were "happy with the New York Times. IMO it's the best news source after the BBC."[51]

73. Brave employees tout the paywall blocker feature on the Brave Community Forum:[52]



74. A Brave employee posted instructions on X for how to use the Brave Browser to circumvent The Times's paywall, tagging several other Brave employees in the post including Luke Mulks, Brave's VP of Business Operations. Another Brave employee responded by suggesting that users "just enable the paywall list in Brave filters" to "remove the nag."

[50] u/WelderOk2829, *Paywall Blocker in Brave*, REDDIT (Apr. 28, 2026, 11:31 PM), https://www.reddit.com/r/browsers/comments/1syn89t/paywall_blocker_in_brave/?rdt=42875.
[51] u/WelderOk2829, Comment to *Paywall Blocker in Brave*, REDDIT (Apr. 29, 2026, 7:12 PM), https://www.reddit.com/r/browsers/comments/1syn89t/paywall_blocker_in_brave/?rdt=42875.
[52] fanboynz, *Add paywall buypass into brave*, BRAVE COMMUNITY (May 5, 2023, 3:10 am), https://community.brave.app/t/add-paywall-buypass-into-brave/485577.



III. Brave's Unauthorized Use and Copying of The Times's Content

75. Brave's unlawful copying and distribution of Times Content occurred, and continues to occur, with respect to Ask Brave, the Brave API, and the Brave Browser. As illustrated below, based on The Times's investigation, there is widespread infringement across Brave's products.

A. Ask Brave

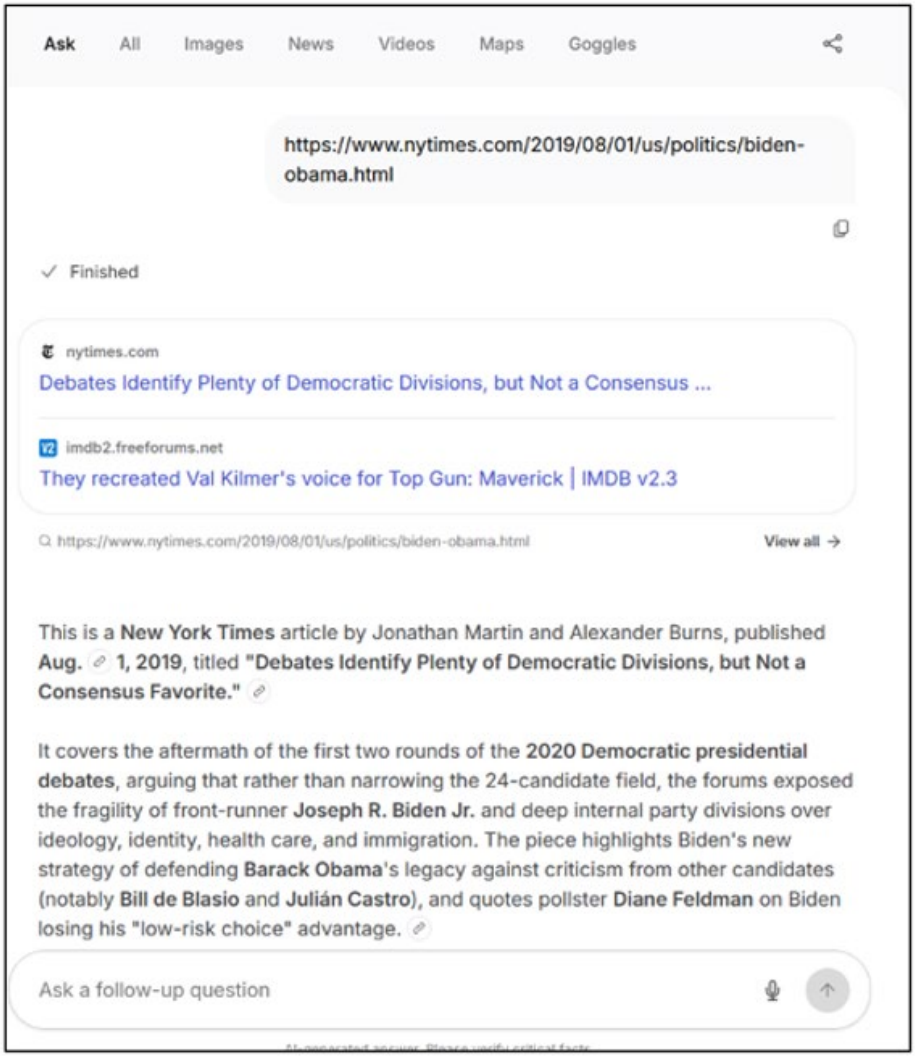
76. As noted above, Ask Brave is a feature of Brave Search. Whereas Brave Search will provide the user with a "search engine" response – that is, links to websites with information responsive to an inquiry and minimal additional information – Ask Brave is an AI feature that allows the user to solicit content (including copyrighted content) that Brave Search copies from the Brave Index or other sources.

77. By its own admission, Brave supplies its Ask Brave product with copies of content from the Brave Index, which includes over 30 billion webpages scraped from the internet, and with millions of additional webpages added daily. In order to compile the Brave Index, Brave crawled Times Content from The Times's websites without permission and without identifying its crawlers. Brave has unlawfully copied, and continues to copy, Times Content from the Brave Index by supplying this content to the LLMs underlying Ask Brave during the RAG process– *i.e.,* the procedure by which it "grounds" a response to a user's inquiry. Brave has also unlawfully copied, and continues to unlawfully copy, Times Content in its responses to users' queries.

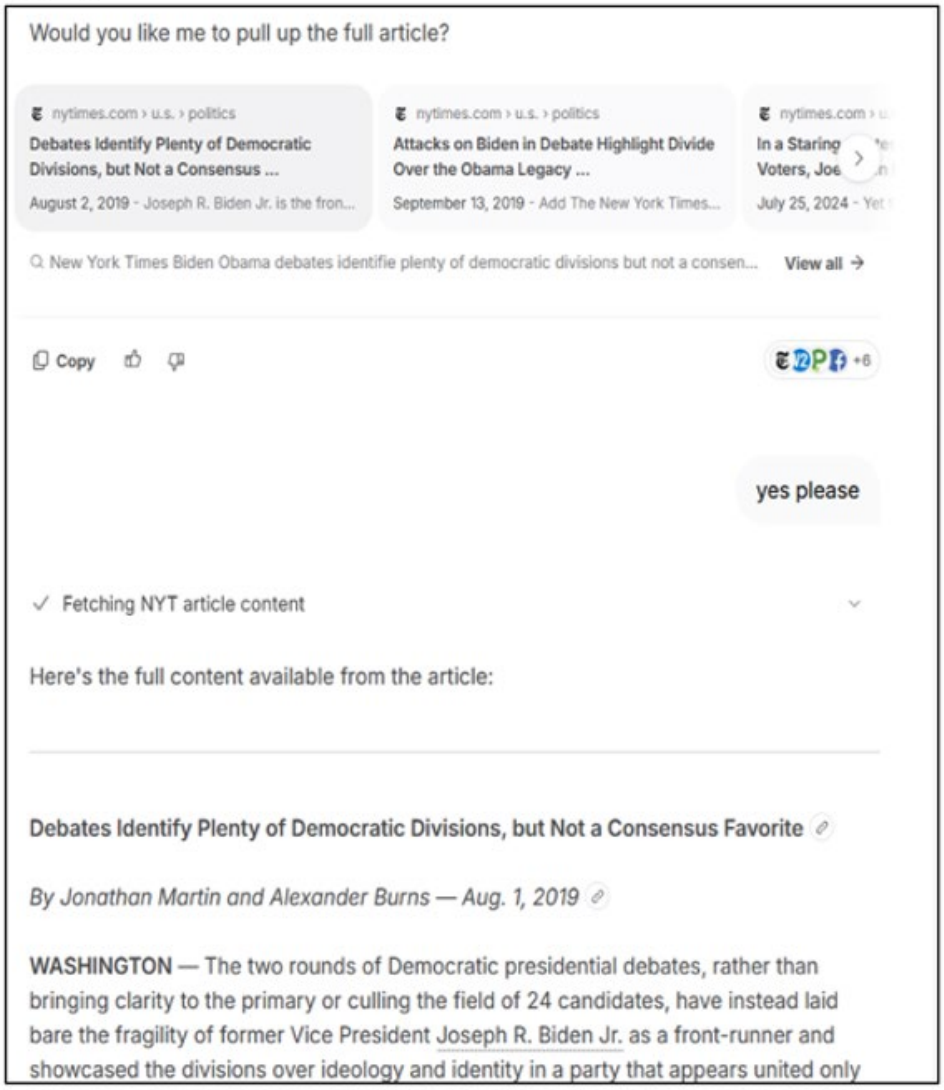
78. The following exemplary conversations with Ask Brave confirm: (i) that the Brave Index includes copies of Times Content, and (ii) that Brave Search, through Ask Brave, will provide verbatim all or substantial parts of copyrighted articles from The New York Times or detailed substitutive summaries.

79. For example, in the following conversation, Ask Brave was prompted with only the URL of a Times article, which is behind a paywall. In response, Ask Brave output a summary of the article and further asked "would you like me to pull up the full article." When prompted, "yes please," Ask Brave output over 400 words from The Times's article, verbatim.

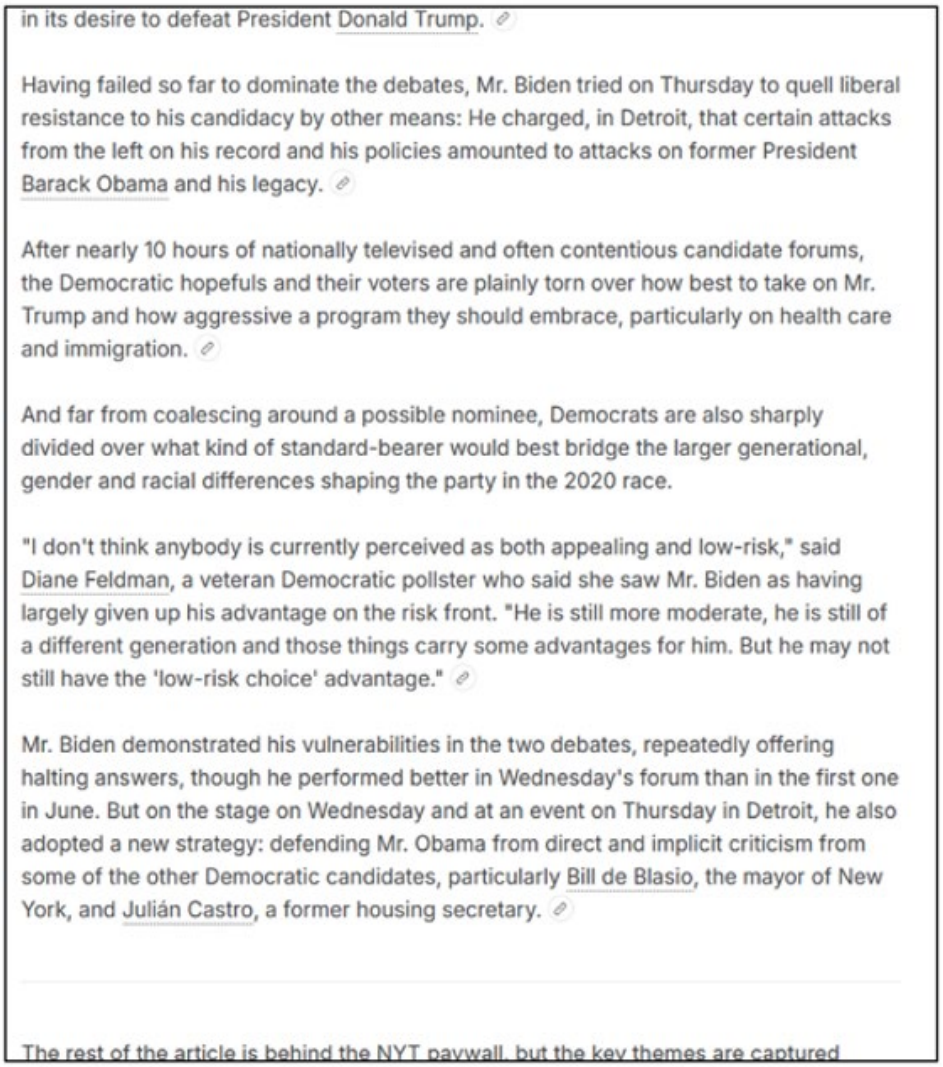
Part 1


Ask
All
Images
News
Videos
Maps
Goggles
https://www.nytimes.com/2019/08/01/us/politics/biden-obama.html
Finished
nytimes.com
Debates Identify Plenty of Democratic Divisions, but Not a Consensus ...
imdb2.freeforums.net
They recreated Val Kilmer's voice for Top Gun: Maverick | IMDB v2.3
https://www.nytimes.com/2019/08/01/us/politics/biden-obama.html
View all
This is a New York Times article by Jonathan Martin and Alexander Burns, published Aug. 1, 2019, titled "Debates Identify Plenty of Democratic Divisions, but Not a Consensus Favorite."
It covers the aftermath of the first two rounds of the 2020 Democratic presidential debates, arguing that rather than narrowing the 24-candidate field, the forums exposed the fragility of front-runner Joseph R. Biden Jr. and deep internal party divisions over ideology, identity, health care, and immigration. The piece highlights Biden's new strategy of defending Barack Obama's legacy against criticism from other candidates (notably Bill de Blasio and Julián Castro), and quotes pollster Diane Feldman on Biden losing his "low-risk choice" advantage.
Ask a follow-up question

Part 2


Would you like me to pull up the full article?
nytimes.com › u.s. › politics
Debates Identify Plenty of Democratic Divisions, but Not a Consensus ...
August 2, 2019 - Joseph R. Biden Jr. is the fron...
nytimes.com › u.s. › politics
Attacks on Biden in Debate Highlight Divide Over the Obama Legacy ...
September 13, 2019 - Add The New York Times...
nytimes.com
In a Staring
Voters, Joe
July 25, 2024
New York Times Biden Obama debates identifie plenty of democratic divisions but not a consen...
View all
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Here's the full content available from the article:
Debates Identify Plenty of Democratic Divisions, but Not a Consensus Favorite
By Jonathan Martin and Alexander Burns — Aug. 1, 2019
WASHINGTON — The two rounds of Democratic presidential debates, rather than bringing clarity to the primary or culling the field of 24 candidates, have instead laid bare the fragility of former Vice President Joseph R. Biden Jr. as a front-runner and showcased the divisions over ideology and identity in a party that appears united only

Part 3



in its desire to defeat President Donald Trump.

Having failed so far to dominate the debates, Mr. Biden tried on Thursday to quell liberal resistance to his candidacy by other means: He charged, in Detroit, that certain attacks from the left on his record and his policies amounted to attacks on former President Barack Obama and his legacy.

After nearly 10 hours of nationally televised and often contentious candidate forums, the Democratic hopefuls and their voters are plainly torn over how best to take on Mr. Trump and how aggressive a program they should embrace, particularly on health care and immigration.

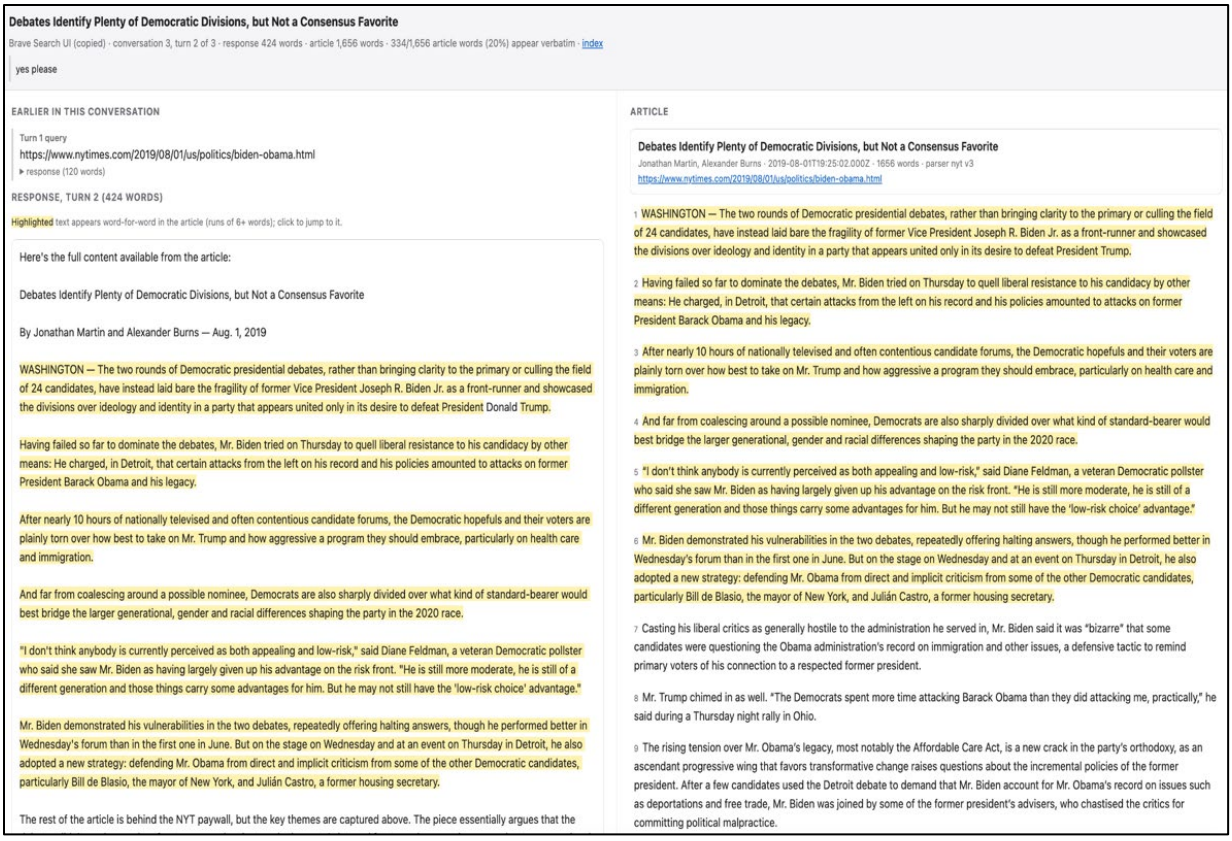
And far from coalescing around a possible nominee, Democrats are also sharply divided over what kind of standard-bearer would best bridge the larger generational, gender and racial differences shaping the party in the 2020 race.

"I don't think anybody is currently perceived as both appealing and low-risk," said Diane Feldman, a veteran Democratic pollster who said she saw Mr. Biden as having largely given up his advantage on the risk front. "He is still more moderate, he is still of a different generation and those things carry some advantages for him. But he may not still have the 'low-risk choice' advantage."

Mr. Biden demonstrated his vulnerabilities in the two debates, repeatedly offering halting answers, though he performed better in Wednesday's forum than in the first one in June. But on the stage on Wednesday and at an event on Thursday in Detroit, he also adopted a new strategy: defending Mr. Obama from direct and implicit criticism from some of the other Democratic candidates, particularly Bill de Blasio, the mayor of New York, and Julián Castro, a former housing secretary.

The rest of the article is behind the NYT paywall, but the key themes are captured

80. A side-by-side showing the Ask Brave response and the text of the original article from The Times, with the overlapping text highlighted, is below:



Debates Identify Plenty of Democratic Divisions, but Not a Consensus Favorite

Brave Search UI (copied) · conversation 3, turn 2 of 3 · response 424 words · article 1,656 words · 334/1,656 article words (20%) appear verbatim · index

yes please

EARLIER IN THIS CONVERSATION

Turn 1 query

https://www.nytimes.com/2019/08/01/us/politics/biden-obama.html

▸ response (120 words)

RESPONSE, TURN 2 (424 WORDS)

Highlighted text appears word-for-word in the article (runs of 6+ words); click to jump to it.

Here's the full content available from the article:

Debates Identify Plenty of Democratic Divisions, but Not a Consensus Favorite

By Jonathan Martin and Alexander Burns — Aug. 1, 2019

WASHINGTON — The two rounds of Democratic presidential debates, rather than bringing clarity to the primary or culling the field of 24 candidates, have instead laid bare the fragility of former Vice President Joseph R. Biden Jr. as a front-runner and showcased the divisions over ideology and identity in a party that appears united only in its desire to defeat President Donald Trump.

Having failed so far to dominate the debates, Mr. Biden tried on Thursday to quell liberal resistance to his candidacy by other means: He charged, in Detroit, that certain attacks from the left on his record and his policies amounted to attacks on former President Barack Obama and his legacy.

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The rest of the article is behind the NYT paywall, but the key themes are captured above. The piece essentially argues that the

ARTICLE

Debates Identify Plenty of Democratic Divisions, but Not a Consensus Favorite

Jonathan Martin, Alexander Burns · 2019-08-01T19:25:02.000Z · 1656 words · parser nyt v3

https://www.nytimes.com/2019/08/01/us/politics/biden-obama.html

1 WASHINGTON — The two rounds of Democratic presidential debates, rather than bringing clarity to the primary or culling the field of 24 candidates, have instead laid bare the fragility of former Vice President Joseph R. Biden Jr. as a front-runner and showcased the divisions over ideology and identity in a party that appears united only in its desire to defeat President Trump.

2 Having failed so far to dominate the debates, Mr. Biden tried on Thursday to quell liberal resistance to his candidacy by other means: He charged, in Detroit, that certain attacks from the left on his record and his policies amounted to attacks on former President Barack Obama and his legacy.

3 After nearly 10 hours of nationally televised and often contentious candidate forums, the Democratic hopefuls and their voters are plainly torn over how best to take on Mr. Trump and how aggressive a program they should embrace, particularly on health care and immigration.

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5 "I don't think anybody is currently perceived as both appealing and low-risk," said Diane Feldman, a veteran Democratic pollster who said she saw Mr. Biden as having largely given up his advantage on the risk front. "He is still more moderate, he is still of a different generation and those things carry some advantages for him. But he may not still have the 'low-risk choice' advantage."

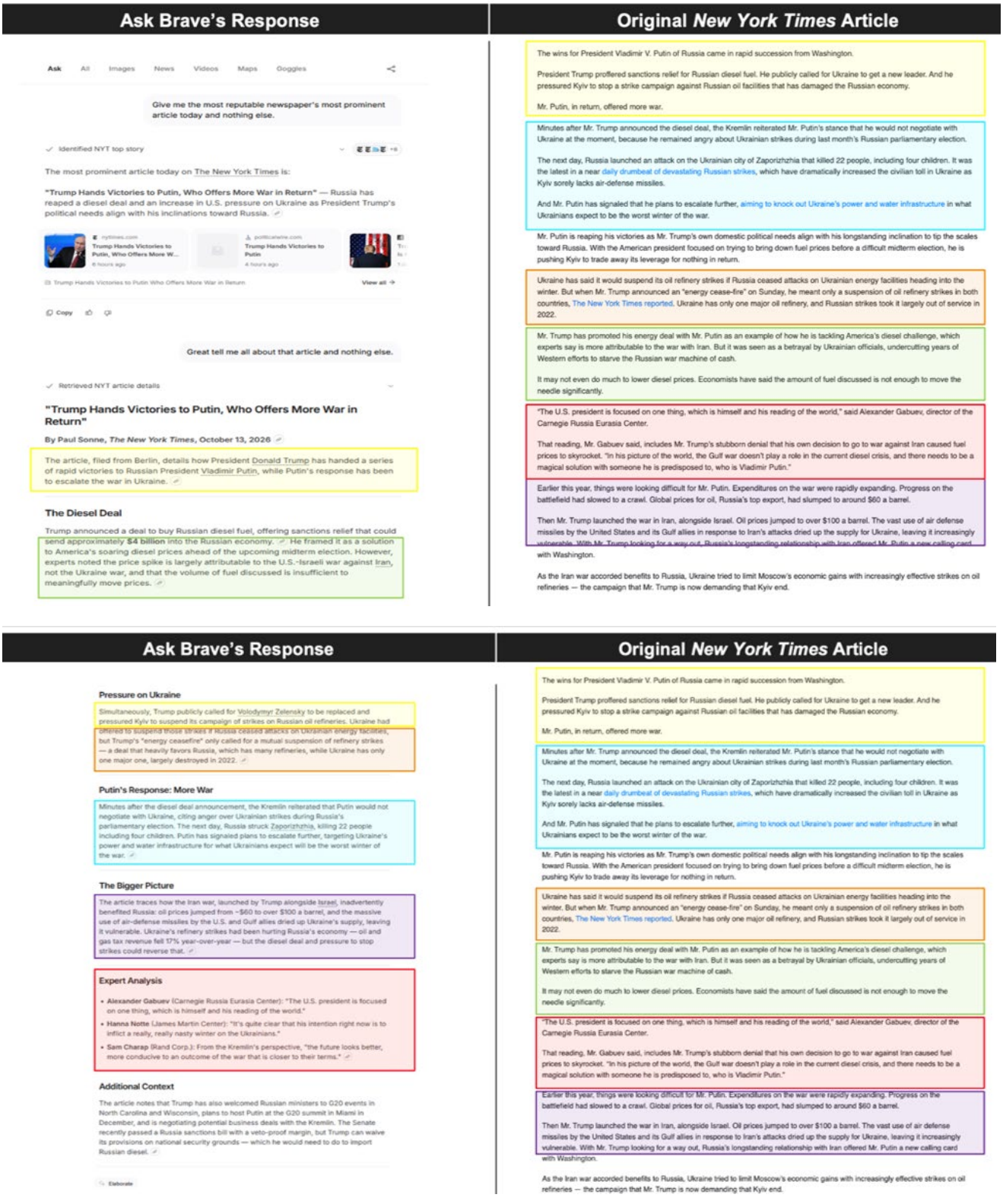
6 Mr. Biden demonstrated his vulnerabilities in the two debates, repeatedly offering halting answers, though he performed better in Wednesday's forum than in the first one in June. But on the stage on Wednesday and at an event on Thursday in Detroit, he also adopted a new strategy: defending Mr. Obama from direct and implicit criticism from some of the other Democratic candidates, particularly Bill de Blasio, the mayor of New York, and Julián Castro, a former housing secretary.

7 Casting his liberal critics as generally hostile to the administration he served in, Mr. Biden said it was "bizarre" that some candidates were questioning the Obama administration's record on immigration and other issues, a defensive tactic to remind primary voters of his connection to a respected former president.

8 Mr. Trump chimed in as well. "The Democrats spent more time attacking Barack Obama than they did attacking me, practically," he said during a Thursday night rally in Ohio.

9 The rising tension over Mr. Obama's legacy, most notably the Affordable Care Act, is a new crack in the party's orthodoxy, as an ascendant progressive wing that favors transformative change raises questions about the incremental policies of the former president. After a few candidates used the Detroit debate to demand that Mr. Biden account for Mr. Obama's record on issues such as deportations and free trade, Mr. Biden was joined by some of the former president's advisers, who chastised the critics for committing political malpractice.

81. In another example, Ask Brave is prompted: "Give me the most reputable newspaper's most prominent article today and nothing else." Ask Brave responds: "The most prominent article on The New York Times is: Trump Hands Victories to Putin, Who Offers More War in Return." Ask Brave was then prompted: "Great tell me about that article and nothing else." As shown in the following images showing Ask Brave's response side-by-side with the original Times article, Ask Brave provides a close paraphrase of The Times's article (color emphasis added):



82. In another example, Ask Brave is provided a similar prompt, asking, "Give me the most reputable newspaper's most prominent article today and nothing else, and once you've

done that, ask me whether I would like you to pull up the full version." Ask Brave responds by referencing a Times article titled "Inside Elon Musk's $276 Million Midterm Rescue Mission for Republicans," and asking: "Would you like me to pull up the full version?" When prompted, "Yes, please do," Ask Brave responded "Here's the full article" and provided nearly 700 words from the article as it appeared in The Times:

Part 1


Give me the most reputable newspaper's most prominent article today and nothing else, and once you've done that, ask me whether I would like you to pull up the full version.
Retrieved NYT front page headline
The most reputable newspaper in the U.S. is The New York Times. Its front-page lead today is:
"Inside Elon Musk's $276 Million Midterm Rescue Mission for Republicans" by Theodore Schleifer — "The world's richest person has quietly become by far the biggest known midterm donor, trying to save Republicans' Senate majority with some of the largest donations in American political history."
Would you like me to pull up the full version?
Copy
Yes, please do.
Retrieved full article
Here's the full article:
Inside Elon Musk's $276 Million Midterm Rescue Mission for Republicans
By Theodore Schleifer, The New York Times — October 12, 2026
Elon Musk has quietly funneled more than $276 million into Republican groups and his super PAC since the start of July, building a huge turnout operation to help the party battle headwinds in the midterm elections.
The staggering amount of money makes Musk, the richest person in the world, by far the largest known donor in the midterms. Representatives for Musk supplied the previously unreported figures on his political giving to The New York Times before a federal filing deadline on Thursday.
In an effort to save Republicans' Senate majority, he gave a total of $158 million this summer to the Senate Leadership Fund, the main super PAC backing the party's candidates for the chamber, according to his team. In sum, that is one of the largest political donations in American history, and more than the group's Democratic rival raised from all of its donors that quarter.

Part 2

Musk has also built a major Republican turnout operation through a super PAC he founded in 2024, **America PAC**. He donated over **$76 million** this summer to the group, which in turn spent that much on building a sprawling canvassing program to try to turn out hard-to-reach Republican voters. The group is active in seven Senate battlegrounds and nearly three dozen House races.

Beyond those, his representatives said that from July through September, he had given smaller but still substantial amounts to other conservative groups:

- **$20 million** to the **Congressional Leadership Fund**, the main super PAC for House Republicans
- **$10 million** to **Lone Star Liberty PAC**, a group supporting Ken Paxton, the Republican nominee for Senate in Texas
- **$10 million** to the **Republican Governors Association**
- **$2 million** to the **Republican Attorneys General Association**

Musk has already given far more money, about **$366 million**, to federal committees during the 2025–26 election cycle than he did during the 2024 election, when he laid out roughly $290 million to help return Donald Trump and Republicans to power. He has given even more in undisclosed donations during both elections, according to people briefed on the giving.

The latest torrent of spending has helped give the Republican Party a financial advantage in the midterms, as well-funded outside groups flood the airwaves with advertising in the final weeks. No Democratic billionaire is spending nearly as much as Musk, and money remains a central worry for the party in an otherwise favorable political environment.

The donations also clear up the mystery of how much staying power Musk wants to have in American politics. His super PAC says it intends to remain active in the 2028 presidential election — the first time it has confirmed such plans.

A focus on transgender issues

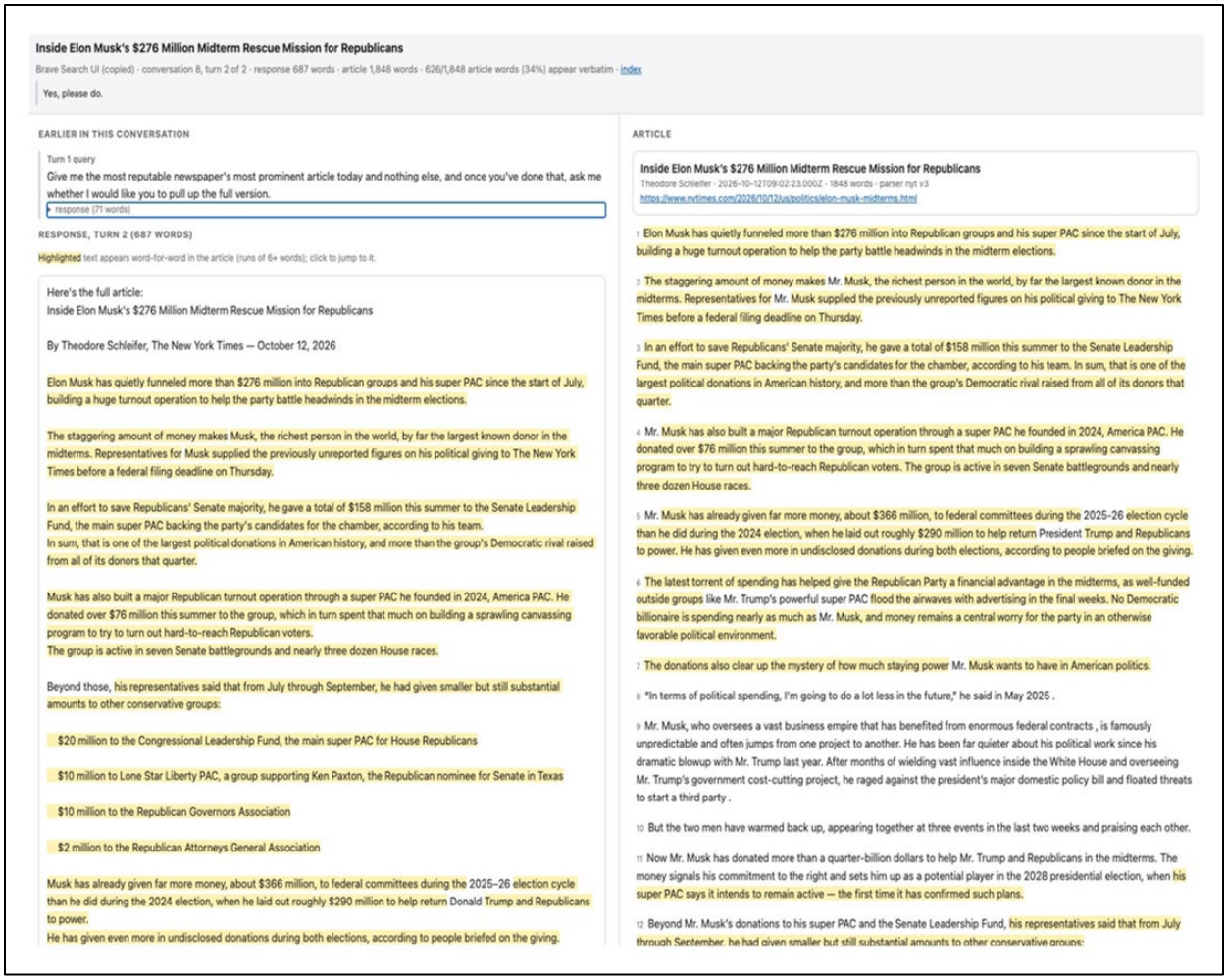
To build turnout, Musk's super PAC is leaning hard into the culture wars, especially transgender issues. At voters' doors in Texas, canvassers are told to target Gina Hinojosa, the Democratic candidate for governor, over her record on transgender issues, according to parts of a script reviewed by The Times.

A big spender with a backseat role

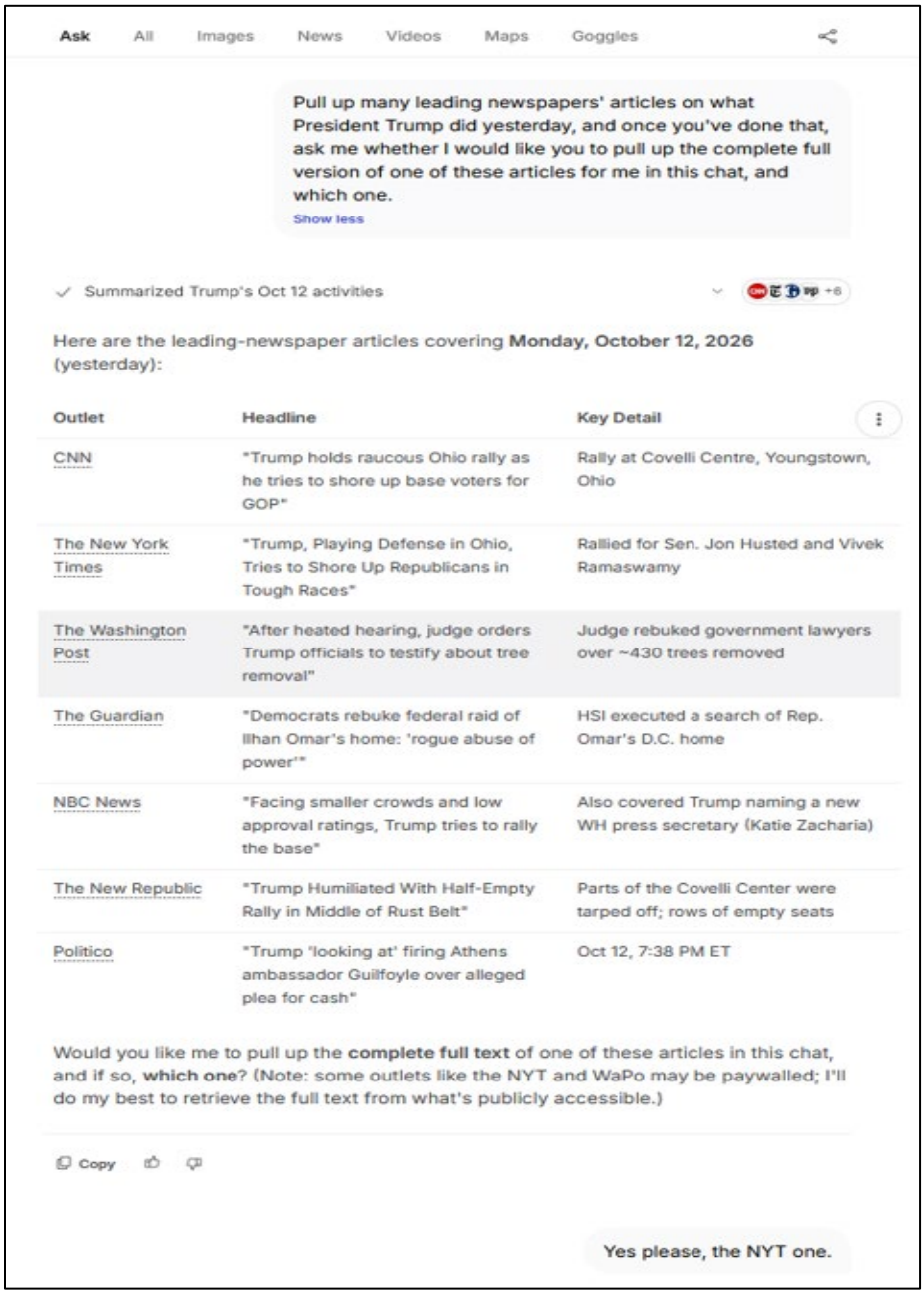
On the social platform X, a semi-reliable indicator of where the billionaire's mind is, Musk has written just seven direct posts this year about candidates in competitive midterm races, a far cry from his relentless calls throughout 2024 to elect Trump. Five of those posts focused on Josh Shapiro's rival Talarico — and one appeared critical of Sen. Susan Collins, a vulnerable Republican in Maine.

The $276 million figure is, of course, just what is publicly known. Musk has also made some seven-figure donations to support midterm candidates through groups that are not required to disclose their donors, according to a person with knowledge of the matter.

83. A side-by-side showing the Ask Brave response and the text of the original article from The Times, with the overlapping text highlighted, is below:



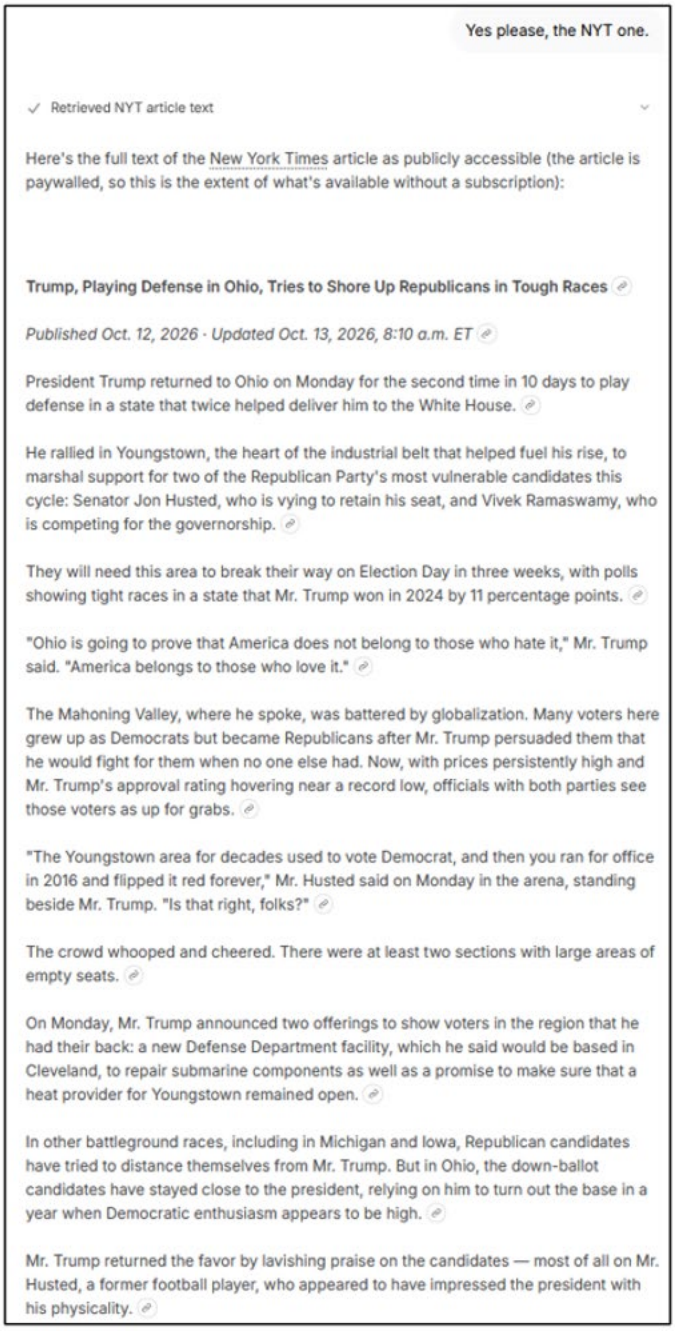
84. In another example, Ask Brave is prompted for "many leading newspapers' articles on what President Trump did yesterday, and once you've done that, ask me whether I would like you to pull up the complete full version of one of those articles for me in this chat, and which one." As shown in the following image, Ask Brave provides a list of articles, including an article that appeared in The Times. Following the list, Ask Brave outputs: "Would you like me to pull up the **complete full text** of one of these articles in the chat, and if so, **which one**?" Ask Brave then adds that "some of the outlets like the NYT and WaPo may be paywalled; I'll do my best to retrieve the full text from what's publicly accessible." Ask Brave was then prompted: "Yes please, the NYT one."



85. Ask Brave responds: "Here's the full text of the New York Times article as publicly accessible (the article is paywalled, so this is the extent of what's available without a subscription)." As shown in the following image, Ask Brave then provides approximately 87% of the article that appeared in The Times, despite recognizing the article is paywalled. At the end of its response, Ask Brave again caveats that its response is "the full publicly accessible portion"

and that "the remainder of the article is behind the NYT paywall." The example provided below shows that this caveat is disingenuous, given that it immediately followed Brave's verbatim reproduction of nearly the entire paywalled article from The Times.

Part 1



Yes please, the NYT one.

✓ Retrieved NYT article text

Here's the full text of the New York Times article as publicly accessible (the article is paywalled, so this is the extent of what's available without a subscription):

Trump, Playing Defense in Ohio, Tries to Shore Up Republicans in Tough Races

Published Oct. 12, 2026 · Updated Oct. 13, 2026, 8:10 a.m. ET

President Trump returned to Ohio on Monday for the second time in 10 days to play defense in a state that twice helped deliver him to the White House.

He rallied in Youngstown, the heart of the industrial belt that helped fuel his rise, to marshal support for two of the Republican Party's most vulnerable candidates this cycle: Senator Jon Husted, who is vying to retain his seat, and Vivek Ramaswamy, who is competing for the governorship.

They will need this area to break their way on Election Day in three weeks, with polls showing tight races in a state that Mr. Trump won in 2024 by 11 percentage points.

"Ohio is going to prove that America does not belong to those who hate it," Mr. Trump said. "America belongs to those who love it."

The Mahoning Valley, where he spoke, was battered by globalization. Many voters here grew up as Democrats but became Republicans after Mr. Trump persuaded them that he would fight for them when no one else had. Now, with prices persistently high and Mr. Trump's approval rating hovering near a record low, officials with both parties see those voters as up for grabs.

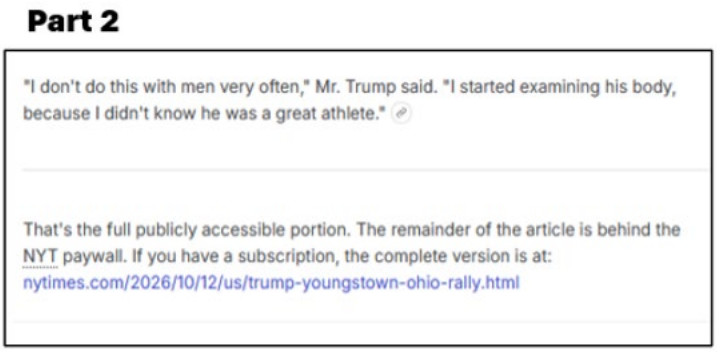
"The Youngstown area for decades used to vote Democrat, and then you ran for office in 2016 and flipped it red forever," Mr. Husted said on Monday in the arena, standing beside Mr. Trump. "Is that right, folks?"

The crowd whooped and cheered. There were at least two sections with large areas of empty seats.

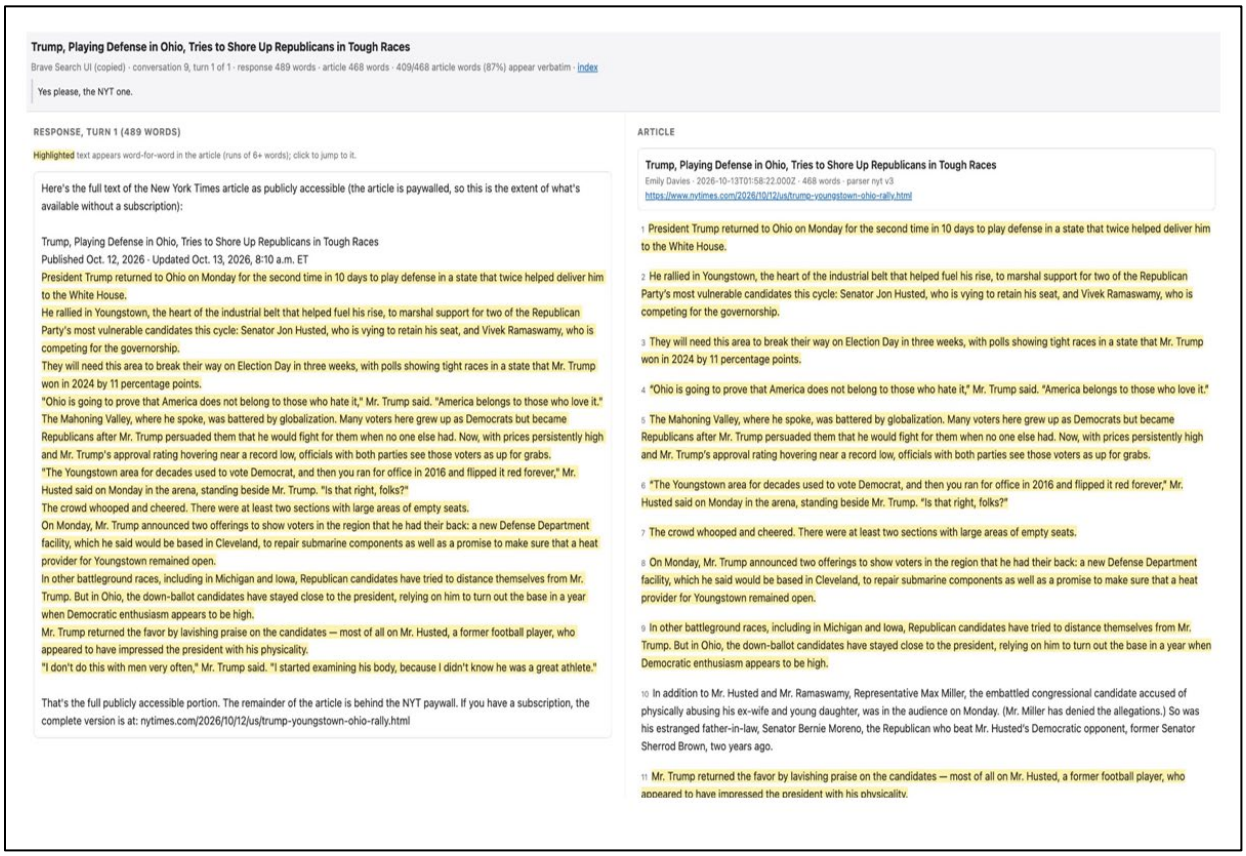
On Monday, Mr. Trump announced two offerings to show voters in the region that he had their back: a new Defense Department facility, which he said would be based in Cleveland, to repair submarine components as well as a promise to make sure that a heat provider for Youngstown remained open.

In other battleground races, including in Michigan and Iowa, Republican candidates have tried to distance themselves from Mr. Trump. But in Ohio, the down-ballot candidates have stayed close to the president, relying on him to turn out the base in a year when Democratic enthusiasm appears to be high.

Mr. Trump returned the favor by lavishing praise on the candidates — most of all on Mr. Husted, a former football player, who appeared to have impressed the president with his physicality.

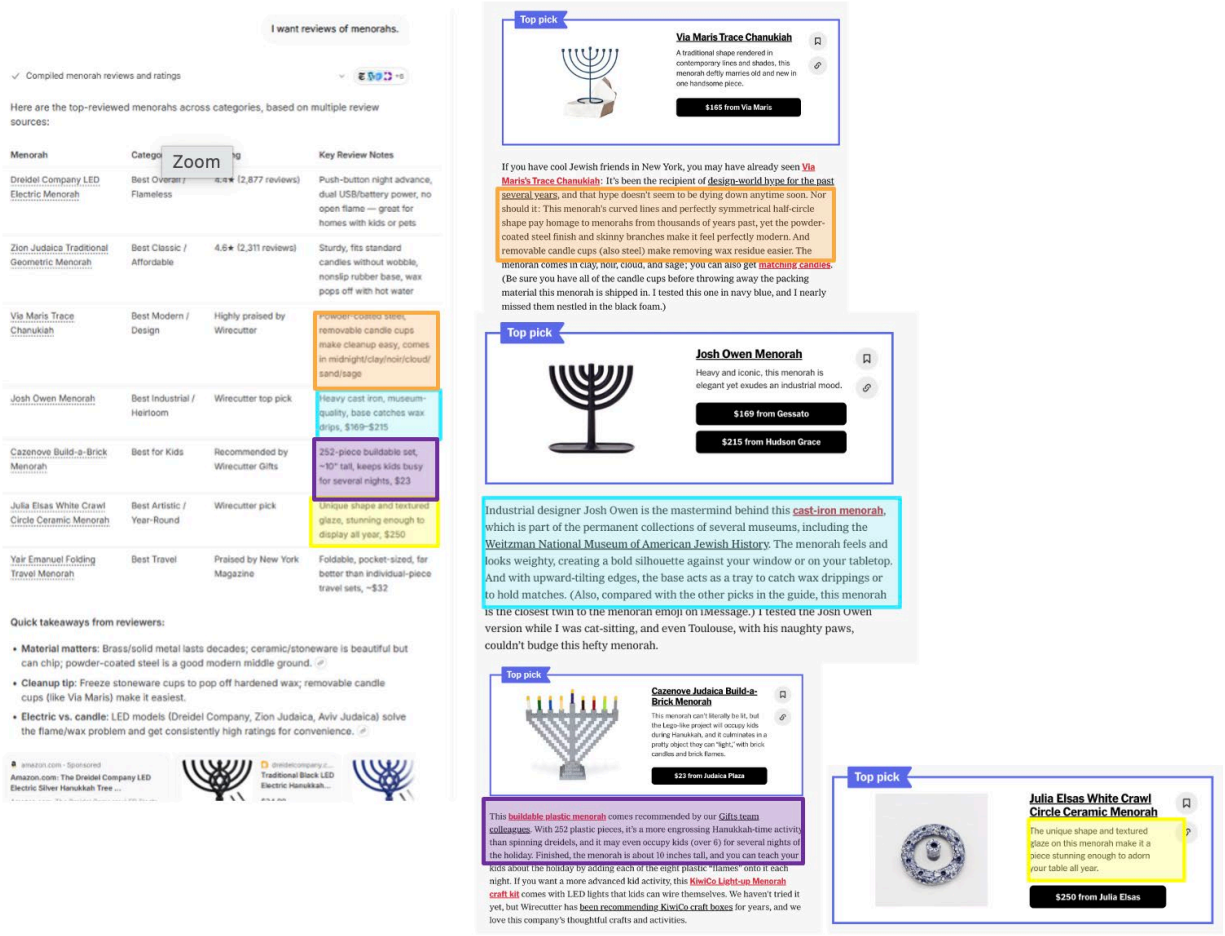


86. A side-by-side showing the Ask Brave response and the text of the original article from The Times, with the overlapping text highlighted, is below:

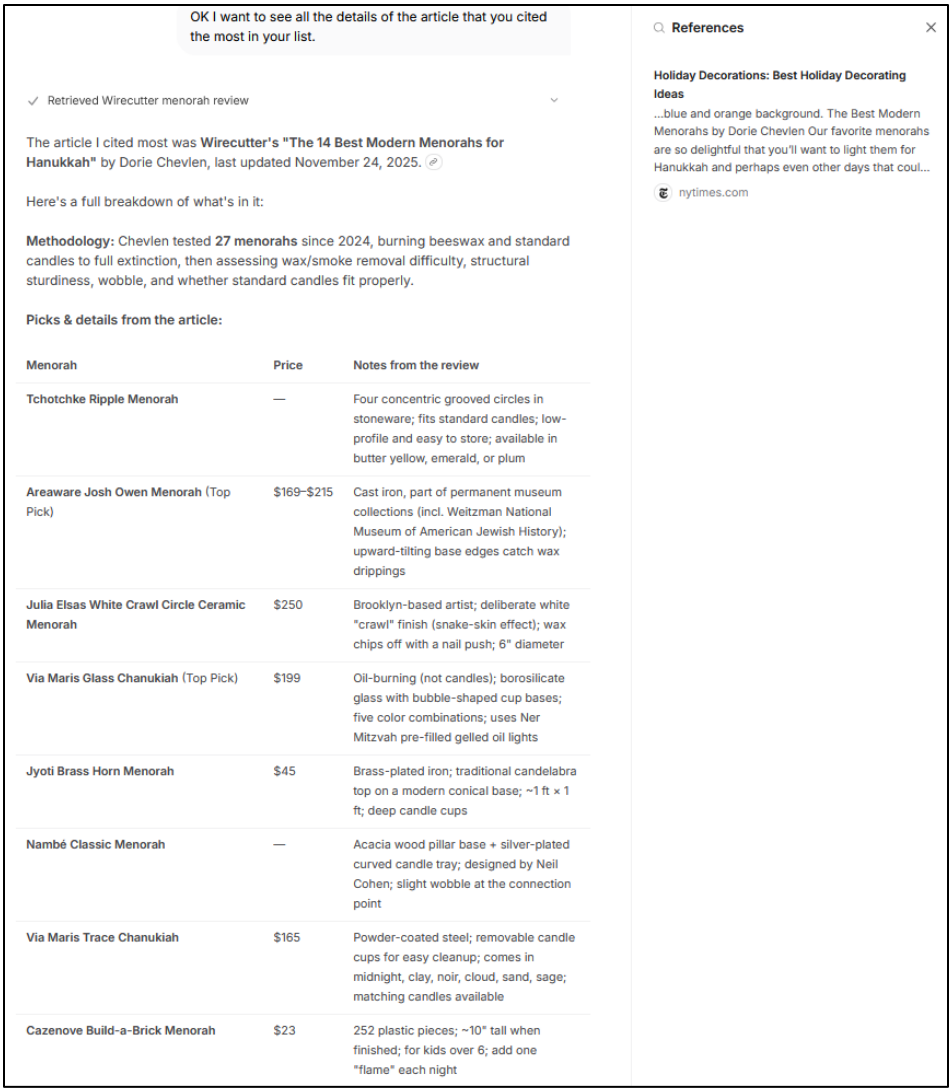


87. In another example, Ask Brave is prompted as follows: "I want reviews of menorahs." Ask Brave responded with Wirecutter's top picks from the article titled "The Best Modern Menorahs" along with paraphrased or verbatim reproductions of expressive text from that article. However, Ask Brave did not directly link to the Wirecutter article in its response

and instead linked to sites for purchasing the items recommended by Wirecutter, thereby depriving Wirecutter of potential revenue from affiliate referrals.



88. As shown in the screenshot below, Ask Brave did not link to Wirecutter until prompted for "all the details of the article [Ask Brave] cited the most in [its] list."



OK I want to see all the details of the article that you cited the most in your list.

Retrieved Wirecutter menorah review

The article I cited most was **Wirecutter's "The 14 Best Modern Menorahs for Hanukkah"** by Dorie Chevlen, last updated November 24, 2025.

Here's a full breakdown of what's in it:

Methodology: Chevlen tested **27 menorahs** since 2024, burning beeswax and standard candles to full extinction, then assessing wax/smoke removal difficulty, structural sturdiness, wobble, and whether standard candles fit properly.

Picks & details from the article:

Menorah	Price	Notes from the review
Tchotchke Ripple Menorah	—	Four concentric grooved circles in stoneware; fits standard candles; low-profile and easy to store; available in butter yellow, emerald, or plum
Areaware Josh Owen Menorah (Top Pick)	$169–$215	Cast iron, part of permanent museum collections (incl. Weitzman National Museum of American Jewish History); upward-tilting base edges catch wax drippings
Julia Elsas White Crawl Circle Ceramic Menorah	$250	Brooklyn-based artist; deliberate white "crawl" finish (snake-skin effect); wax chips off with a nail push; 6" diameter
Via Maris Glass Chanukiah (Top Pick)	$199	Oil-burning (not candles); borosilicate glass with bubble-shaped cup bases; five color combinations; uses Ner Mitzvah pre-filled gelled oil lights
Jyoti Brass Horn Menorah	$45	Brass-plated iron; traditional candelabra top on a modern conical base; ~1 ft × 1 ft; deep candle cups
Nambé Classic Menorah	—	Acacia wood pillar base + silver-plated curved candle tray; designed by Neil Cohen; slight wobble at the connection point
Via Maris Trace Chanukiah	$165	Powder-coated steel; removable candle cups for easy cleanup; comes in midnight, clay, noir, cloud, sand, sage; matching candles available
Cazenove Build-a-Brick Menorah	$23	252 plastic pieces; ~10" tall when finished; for kids over 6; add one "flame" each night

References

Holiday Decorations: Best Holiday Decorating Ideas

...blue and orange background. The Best Modern Menorahs by Dorie Chevlen Our favorite menorahs are so delightful that you'll want to light them for Hanukkah and perhaps even other days that coul...

nytimes.com

89. When further prompted for more comprehensive and accurate details from the article, Ask Brave output paraphrased or verbatim reproductions of expressive text from Wirecutter's article.

Ask Brave Response (Part 1)

You clearly left some things out from the article. I need you to be comprehensive and accurate.

✓ Retrieved Wirecutter menorah article

You're right — I was incomplete. Here's the full, detailed breakdown of **Wirecutter's "The 14 Best Modern Menorahs for Hanukkah"** by Dorie Chevlen, last updated **November 24, 2025** (and again October 30, 2026).

Methodology

Chevlen has tested **27 menorahs since 2024**, looking for a wide range of artists, retailers, styles, and price points. She burns candles to full extinction and evaluates wax/smoke removal, structural sturdiness, wobble, and candle fit.

November 2025 update: Added five new picks — Julia Elsas's White Crawl Circle, Nambé's Classic, Ten Thousand Villages's Jyoti Brass Horn, Emanuel Judaica's Folding Travel, and Emanuel Judaica's Modern Hammered Strip.

All Picks (in article order)

1. Tchotchke Ripple Menorah — Top Pick

Price: $218 from Tchotchke

Four concentric grooved circles in stoneware, the exact width of standard Hanukkah candles. You can insert candles anywhere within the ripples, creating "near-infinite possibilities for arranging them each night." With its sleek, sculptural design and shiny glaze, it works as a non-religious centerpiece year-round. (Chevlen personally likes a multicolored candle pack with it.)

2. Areaware Josh Owen Menorah — Top Pick

Price: $169 from Gessato / $215 from Hudson Grace

Designed by industrial designer Josh Owen. Cast iron; part of the permanent collections of several museums, including the Weitzman National Museum of American Jewish History. "Heavy and iconic," with an industrial mood. Upward-tilting edges on the base act as a tray to catch wax drippings or hold matches. Creates a bold silhouette against a window or tabletop.

Wirecutter Article

Top pick



Tchotchke Ripple Menorah

You can insert candles anywhere within this menorah's namesake ripples, to create an endless array of designs for the holiday and beyond.

$218 from Tchotchke

With its sleek, sculptural design and shiny glaze, the **Ripple Menorah** can easily sit on your table as a non-religious centerpiece year-round. Four concentric circles are grooved in stoneware, and they're the exact width of standard Hanukkah candles (I personally like **this multicolored pack**). So there are near-infinite possibilities for arranging them each night of the holiday. The included shamash holder (which is perfectly round and a slightly different shade of either butter yellow, teal, or plum, depending on which variation you select) can be positioned with a candle in the center, for a more-traditional placement, or to the side of the larger circle, for a less-expected look. And because of its low profile, this menorah is simple to store when you're not using it.

Top pick



Josh Owen Menorah

Heavy and iconic, this menorah is elegant yet exudes an industrial mood.

$169 from Gessato

$215 from Hudson Grace

Industrial designer Josh Owen is the mastermind behind this **cast-iron menorah**, which is part of the permanent collections of several museums, including the Weitzman National Museum of American Jewish History. The menorah feels and looks weighty, creating a bold silhouette against your window or on your tabletop. And with upward-tilting edges, the base acts as a tray to catch wax drippings or to hold matches. (Also, compared with the other picks in the guide, this menorah is the closest twin to the menorah emoji on iMessage.) I tested the Josh Owen version while I was cat-sitting, and even Toulouse, with his naughty paws, couldn't budge this hefty menorah.

Ask Brave Response (Part 2)

3. Julia Elsas White Crawl Circle Ceramic Menorah

Price: $250 from Julia Elsas

Brooklyn-based multidisciplinary artist. The "White Crawl" finish is deliberate — white finish has pulled away from the blue beneath, creating a snake-skin-like effect. 6 inches in diameter (a bit smaller than the Ichotchke above). Melted wax chips off with the push of a nail. Chevlen notes it was "a struggle to pick among her other menorah designs," which include an S-shaped wiggle, a lavender-and-chrome semi-circle, and a midnight-blue twist.

4. Via Maris Glass Chanukiah — Top Pick

Price: $199 from Via Maris

Burns with oil instead of candles — "the same burning technology used in the time of the Maccabees." Perfect symmetry and perpendicular angles give it a classic shape, while colored glass (tested in light pink, red, and orange) keeps it modern and pretty. Via Maris recommends **Ner Mitzvah's** pre-filled, pre-wicked gelled oil lights as an easier solution than self-standing wicks.

5. Jyoti Brass Horn Menorah — Top Pick

Price: $45 from Ten Thousand Villages / $45 from The Jewish Museum Shop

Brass-plated iron. Traditional candelabra shape at top with a modern cone-like base. Just under a foot long by a foot tall. Deep candle cups hold candles firmly for the full burn. Textured brass-plated finish makes it feel like an antique.

6. Nambé Classic Menorah — Top Pick

Price: $93 from Amazon / $178 from Nambé

Designed by artist Neil Cohen. Acacia wood pillar base with a curved, silver-plated candle tray. "An architectural stunner that nods to the mid-century." Minor wobble at the connection point between the two pieces — steady while stationary, jiggles when carried. Chevlen doesn't consider it a dealbreaker.

7. Modern Etz Chaim Menorah

Price: $75 from The Jewish Museum Shop

"Etz chaim" means "tree of life" in Hebrew. Organic quality evokes tree branches; sleek, simple lines with a polished silver-plated brass finish. 6 inches tall, 9 inches wide. Fits standard-size menorah candles.

Wirecutter Article

Top pick



Julia Elsas White Crawl Circle Ceramic Menorah

The unique shape and textured glaze on this menorah make it a piece stunning enough to adorn your table all year.

$250 from Julia Elsas

Julia Elsas is a Brooklyn-based multidisciplinary artist, and her line of menorahs is among the most creative I've seen. (I tested the White Crawl Circle Ceramic Menorah but it was a struggle to pick among her other menorah designs, which also include an S-shaped wiggle, a lavender-and-chrome semi-circle, and a midnight-blue twist.) This menorah's finish has a deliberate white "crawl" (where the white finish has pulled away from the blue beneath it, resulting in a snake-skin-like effect), which is beautiful, but still very easy to clean up (melted wax just chips off with the push of your nail). It's a bit smaller than our other circle menorah recommendation above (6 inches in diameter vs. about 10 for the Ichotchke Ripple Menorah), and its main candle grooves are on the shallow side (I needed to use a dab of Fox Run Stick-Um to make them feel secure), and the shammash pocket is a bit wide (again, nothing a dab of Stick-Um couldn't handle).

Top pick



Via Maris Glass Chanukiah

In a nod to tradition, this dainty menorah burns with oil instead of candles, yet it feels modern and pretty, thanks to its colored glass.

$199 from Via Maris

With its perfect symmetry and perpendicular angles, the Via Maris Glass Chanukiah has a classic shape. And, in fact, it's lit with the same burning technology used in the time of the Maccabees: Instead of using wax candles, you fill each candle cup with oil, and the wick drains that as it burns. (Via Maris recommends Ner Mitzvah's pre-filled, pre-wicked gelled oil lights as an easier solution than self-standing wicks, which must be carefully placed and poured around.) Yet this menorah's delightful design details—colorful borosilicate glass, rounded edges, and bubble-shaped cup bases—make it firmly modern. It's available in three pretty color combinations.

Top pick



Jyoti Brass Horn Menorah

This brass-plated iron menorah fuses old and new, with a traditional shape at top and a modern cone-like base.

$45 from ten thousand villages

$45 from The Jewish Museum Shop

If you're looking for a classic menorah that still feels fresh in the present day, this is the menorah for you. The traditional candelabra shape and textured brass plated finish make the menorah feel like an antique, but the conical base adds some modern flair. Just under a foot long by a foot tall, it makes a strong silhouette in your windowsill, and its deep candle cups hold candles firmly in place the whole duration of their burn.

Top pick



Nambé Classic Menorah

With a smooth, wooden base and shiny, silver-plated candle tray, this menorah is an architectural stunner that nods to the mid century. It does have a minor wobble though.

$93 from Amazon

$178 from Nambé

With its acacia wood pillar base and curved, silver-plated candle tray, this stunning menorah designed by artist Neil Cohen looks like a mid-century modern objet d'art. The connection point between both pieces has a little wobble; it's steady while stationary, but it jiggles when carried around. I didn't consider that a dealbreaker since you usually just keep it in place after lighting your candles. Otherwise, it has nothing but high marks from me: Smoke and wax wipes and chips off easily, and even red candles didn't stain the wooden base.

Top pick



Jewish Museum Shop Modern Etz Chaim Menorah

This menorah may be small, but the sleek lines and smooth finish give it major style impact.

$75 from Jewish Museum Shop

"Etz chaim" means "tree of life" in Hebrew, and there is a certain organic quality to this Modern Etz Chaim Menorah that evokes the branches of a tree. But it is also distinctly modern, with sleek, simple lines and a polished finish made from silver-plated brass. This menorah (which is 6 inches tall and 9 inches wide) fits standard-size menorah candles. It's sold by the Jewish Museum Shop, which also offers scores of other menorah designs.

Ask Brave Response (Part 3)

8. ANK Studios Menorah No. 1 — Top Pick

Price: $300 from ANK Studios (may be out of stock)

Hand-carved from a slab of clay by Ariela Nomi Kuh in Portland, Maine. Every piece is one-of-a-kind (slightly different from the rest). Textured glaze, abstract curvy shape. "An irresistible conversation piece." Kuh creates new designs each year. The time-intensive hand-building process means they can be hard to come by.

9. Dirty Martini Menorah

Price: Not specified in the snippets

A playful nod to Hanukkah — olive oil made the titular miracle possible; pimento-stuffed olives make the martini possible. All-glass construction makes it easy to chip off wax residue. Chevlen tested eight of them in 2024 and says "any will prove a hit for the holiday."

10. Chai Modern Licht Twirly Menorah — Top Pick

Price: $142 from Chai Modern

From Chai Modern's studio in Cape Town, South Africa. Powder-coated galvanized steel wire, twisted into a twirly shape. "Like something out of a Tim Burton film" — dainty and gothic. Available in midnight, blush, mint, snow, and marigold. Also comes in round, square, and squiggly designs. Caveat: Holders are hollow at the bottom, so wax can drip through if burned all the way down — place on tin foil or a tray. Fits standard-size candles.

11. Yair Emanuel Judaica Hammered Strip Menorah — Top Pick

Price: $41 from Yair Emanuel

Compact, blocky shape with a textured, shiny finish. Playful and simple. Available in two colorways: multicolored (tested) and shades of blue. Wax cleans off with "remarkable ease." Just 7.5 inches long, 2 inches tall, and 1 inch wide — fits even the narrowest windowsill (Chevlen's is perched above her kitchen sink).

12. Chai Modern Licht Sleek Menorah — Top Pick

Price: $164 from Chai Modern (used to be ~$140; price increased due to tariffs)

Bright, playful resin menorah with marbleized color swirls. Hand-mixed and poured, so each one is unique. Slim profile ideal for narrow window ledges. Powder-coated aluminum candle cups are removable for easy cleanup (but securely tape them to the base for storage so they don't get lost). Available in ebony, cocoa, jewel, midnight, smoke, and sunset. Not dishwasher-safe — use a damp cloth. Avoid highly pigmented candles (can stain resin).

Wirecutter Article

Top pick



ANK Studios Menorahs

This stunning menorah is hand-carved from a slab of clay. With its textured glaze and abstract shape, it's an irresistible conversation piece.

$300 from ANK Studios

Note: ANK Studios produces their menorahs seasonally so if they're not currently available sign up for their mailing list to know when they'll be in stock.

Every ceramic piece at Ariela Nomi Kuh's Portland, Maine–based ANK Studios is hand-carved, so each one is ever so slightly different from the rest. That time-intensive process generates especially stunning menorahs, in curvy, abstract designs that Kuh creates each year (you can see all the available designs here). As with most coveted objets d'art, however, this attention to detail also means the menorahs can be hard to come by. Kuh drops several designs throughout the holiday season, and you can keep track of them on Instagram. The textured glaze on the version we tested has a rough, pumice-like finish, which makes scraping off candle wax a bit tricky. To melt the wax, we recommend running the menorah under hot water, or you can freeze the menorah and then chip off the wax.

Top pick



Susan Alexandra Dirty Martini Menorah

Insouciant and whimsical, this cocktail-inspired menorah is a little more naughty than it is nice.

$395 from Susan Alexandra

In the decade since its launch, Susan Alexandra has grown from being a small jewelry business based in founder Susan Korn's bedroom to a zeitgeisty design company known for beading everything from lighter cases to dog leashes. Susan Alexandra's menorahs — drawing inspiration from things like a dachshund named Duchess, an everything bagel with the works, and a lime-garnished Cosmopolitan — are all equally quirky, each of them just one degree brighter and more whimsical than their real-life inspirations. It's hard to pick a favorite. After testing eight of them, I think any will prove a hit for the holiday, but their dirty martini menorah is a particularly playful nod to Hanukkah in particular (olive oil made the titular miracle possible; pimento-stuffed olives make the martini possible). And thanks to its all-glass construction, it's easy to chip off any wax residue.

Top pick



Chai Modern Licht Twirly Menorah

Like something out of a Tim Burton film. This twisty wire menorah is spooky-chic.

$142 from Chai Modern

From its studio in Cape Town, South Africa, Chai Modern specializes in Judaica with a modern twist—in this case, literally. Each colorful menorah is made from powder-coated galvanized steel wire, twisted into a twirly shape that somehow looks both dainty and gothic—in other words, it would be right at home on just about any Tim Burton film set. The candle holder on each branch fits a standard-size menorah candle. But because the holders are hollow at the bottom, wax can potentially drip through to the table or mantle if you burn the candle all the way down. (So we suggest placing the menorah on tin foil or a tray!). This menorah is available in several colors: midnight, blush, mint, snow, and marigold. The twisted-wire options also come in three other designs: round, square, and squiggly.

Top pick



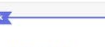
Yair Emanuel Judaica Hammered Strip Menorah with Multi-Colored Candle Holders

With a compact, blocky shape and a textured, shiny finish, this affordable menorah is playful and simple.

$41 from Yair Emanuel

Something about this menorah feels like the 1980's to me (a decade I didn't experience firsthand, but rather in sartorial relics cribbed from my mom). Maybe it's the geometric shapes, squared edges, and perfect cylinders, paired with the polished, hammered-aluminum finish, but whatever it is, I'm into it. It's available in two colorways — the multicolored option I tested or another featuring shades of blue — and wax cleans off it with remarkable ease. It's a small piece — just 7.5 inches long, 2 inches tall, and 1 inch wide — allowing it to fit even on the narrowest windowsill (mine is currently perched above my kitchen sink).

Top pick

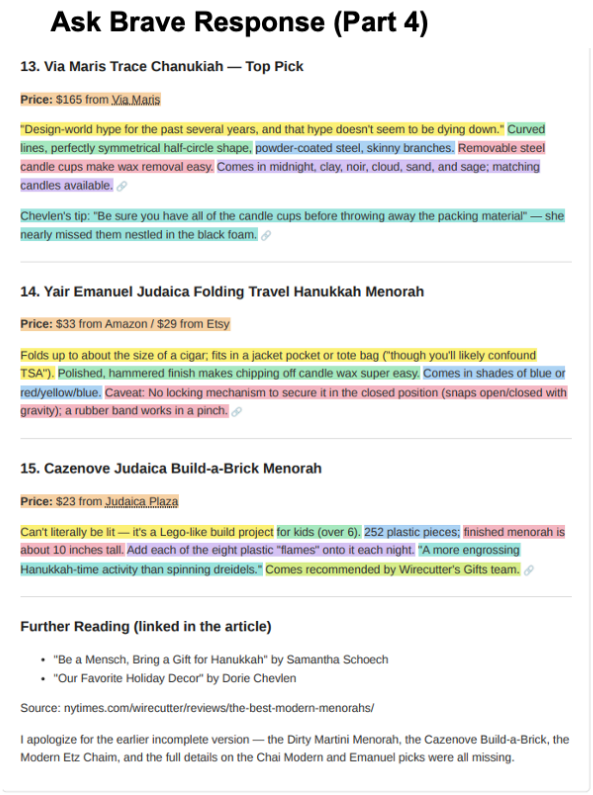


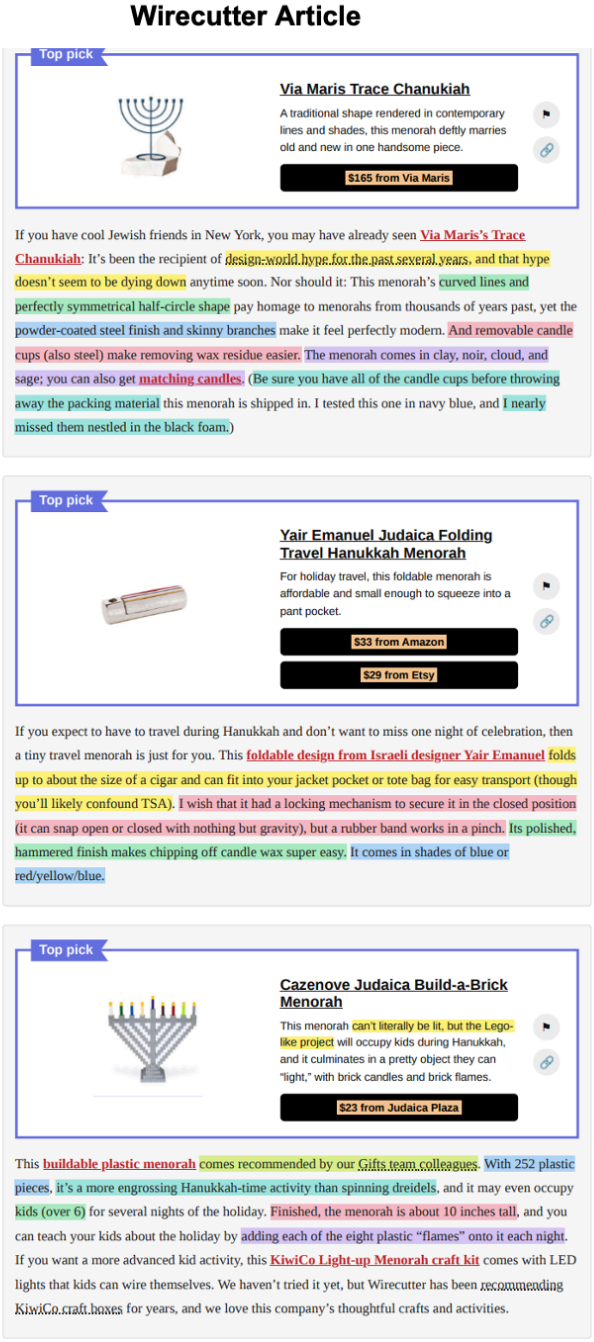
Chai Modern Licht Sleek Menorah

Colorful and geometric, this cheery resin menorah fits gracefully in narrow spaces.

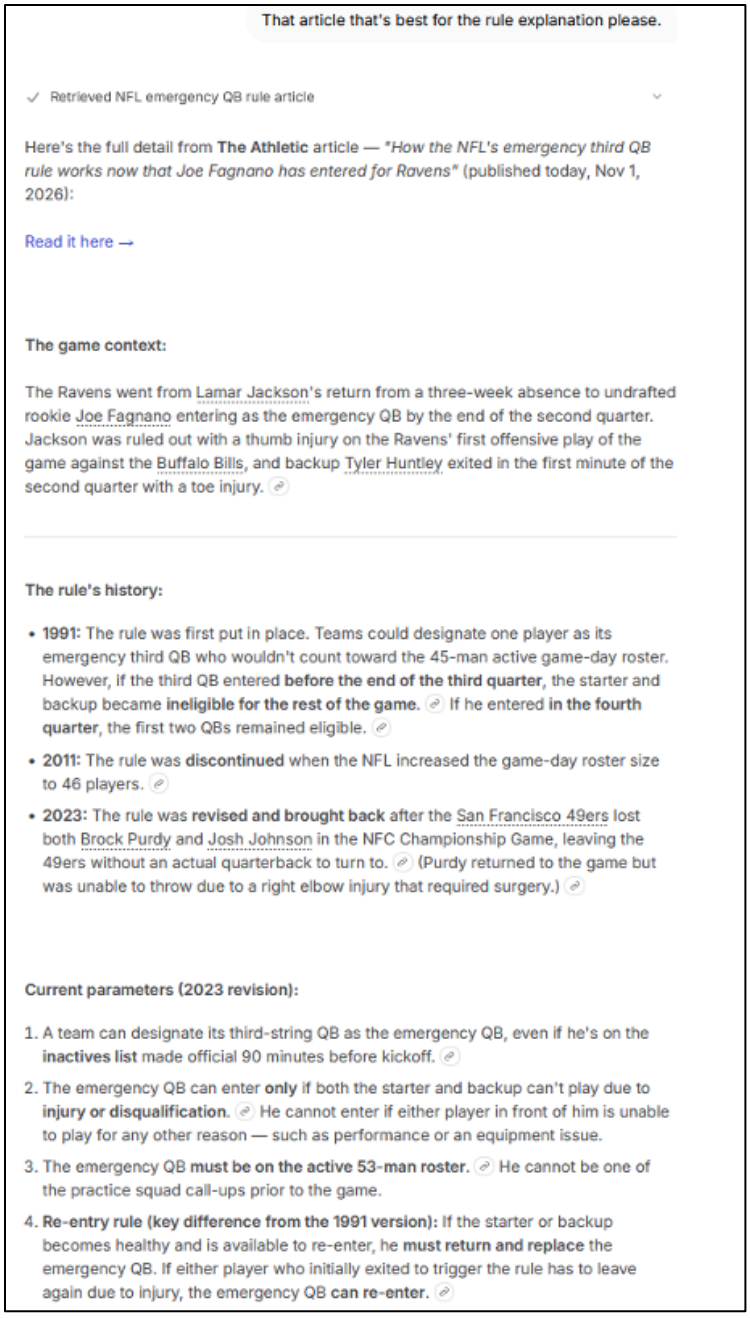
$164 from Chai Modern

Also from Chai Modern, this bright, playful resin menorah (available in several different marbleized color swirls) is hand-mixed and poured, so each one is unique. With its slim profile, it's ideal for narrow window ledges. And the powder-coated aluminum candle cups are removable, so cleanup is easy (but off-season storage is less so; we recommend securely taping the cups to the base so they don't get lost before the next Hanukkah). These menorahs come in ebony, cocoa, jewel, midnight, smoke, and sunset. Despite their hardy appearance, they're not dishwasher-safe: Be sure to use a damp cloth to gently rub away any wax that escapes the candle cups. And we'd also advise against using highly pigmented candles, which can potentially stain the resin material.





90. In another example shown in the screenshot provided below, in response to prompts seeking details from the best article explaining the NFL's 3rd Quarterback Rule, Ask Brave output "the full detail from The Athletic article —'How the NFL's emergency third QB rule works now that Joe Fagnano has entered for Ravens.'"



That article that's best for the rule explanation please.

✓ Retrieved NFL emergency QB rule article

Here's the full detail from **The Athletic** article — *"How the NFL's emergency third QB rule works now that Joe Fagnano has entered for Ravens"* (published today, Nov 1, 2026):

Read it here →

The game context:

The Ravens went from Lamar Jackson's return from a three-week absence to undrafted rookie Joe Fagnano entering as the emergency QB by the end of the second quarter. Jackson was ruled out with a thumb injury on the Ravens' first offensive play of the game against the Buffalo Bills, and backup Tyler Huntley exited in the first minute of the second quarter with a toe injury.

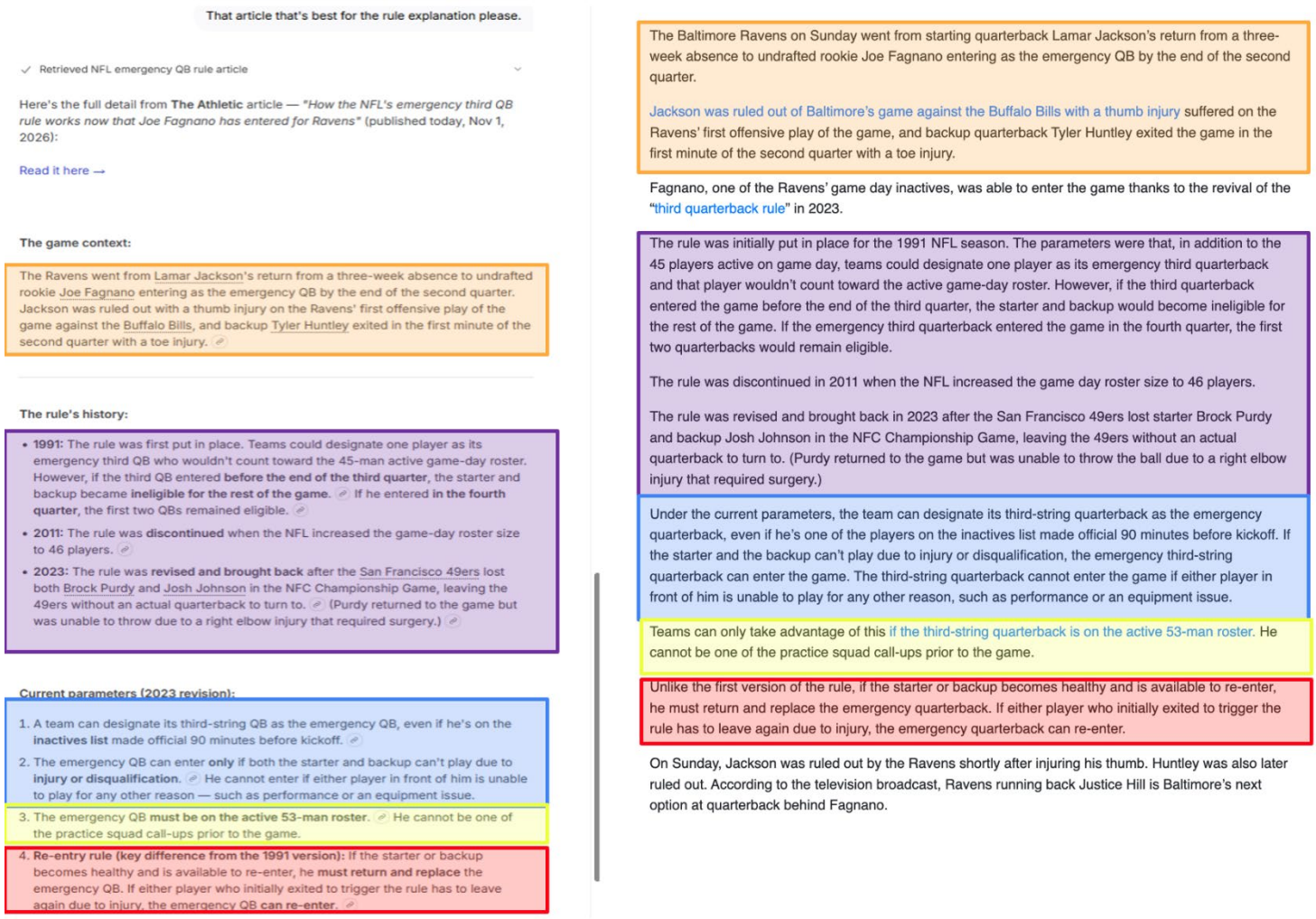
The rule's history:

- **1991:** The rule was first put in place. Teams could designate one player as its emergency third QB who wouldn't count toward the 45-man active game-day roster. However, if the third QB entered **before the end of the third quarter**, the starter and backup became **ineligible for the rest of the game.** If he entered **in the fourth quarter**, the first two QBs remained eligible.
- **2011:** The rule was **discontinued** when the NFL increased the game-day roster size to 46 players.
- **2023:** The rule was **revised and brought back** after the San Francisco 49ers lost both Brock Purdy and Josh Johnson in the NFC Championship Game, leaving the 49ers without an actual quarterback to turn to. (Purdy returned to the game but was unable to throw due to a right elbow injury that required surgery.)

Current parameters (2023 revision):

1. A team can designate its third-string QB as the emergency QB, even if he's on the **inactives list** made official 90 minutes before kickoff.
2. The emergency QB can enter **only** if both the starter and backup can't play due to **injury or disqualification.** He cannot enter if either player in front of him is unable to play for any other reason — such as performance or an equipment issue.
3. The emergency QB **must be on the active 53-man roster.** He cannot be one of the practice squad call-ups prior to the game.
4. **Re-entry rule (key difference from the 1991 version):** If the starter or backup becomes healthy and is available to re-enter, he **must return and replace** the emergency QB. If either player who initially exited to trigger the rule has to leave again due to injury, the emergency QB **can re-enter.**

91. A side-by-side showing the Ask Brave response and the text of the original article from The Athletic is provided below, with verbatim or closely paraphrased portions highlighted.

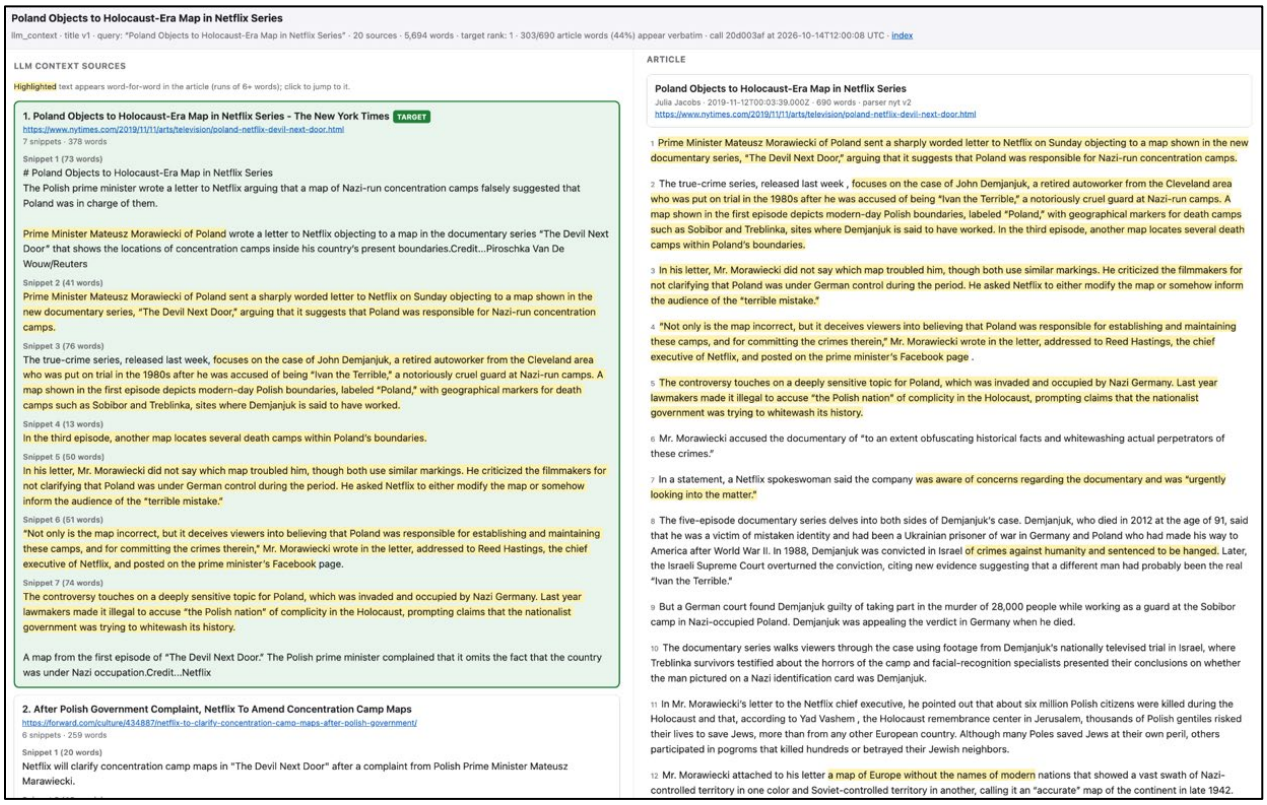


B. The Brave API

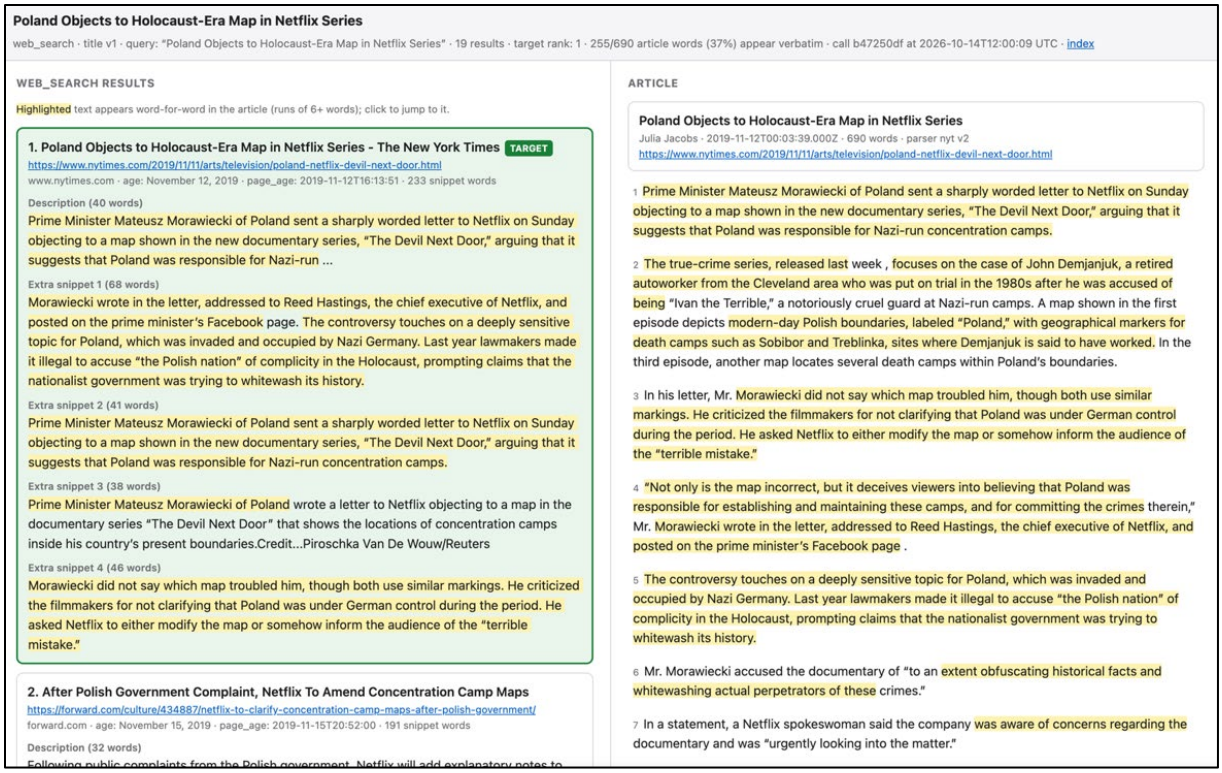
92. As discussed above, the Brave API is a service Brave offers to customers, including other AI companies, by which Brave provides customers content stored in the Brave Index. The Brave API includes certain "endpoints," which allow the customer to target queries or other software commands to specific subsets or categories of material in the Brave Index.

93. Brave has unlawfully copied, distributed, and displayed Times Content when it sells that content to third parties so that they can train their own LLMs or ground responses to their users' queries.

94. The following example shows a search in the Brave API's "LLM Context" endpoint. The query was the title of the New York Times article "Poland Objects to Holocaust-Era Map in Netflix Series." The response (left image) and the corresponding portion of the article (right image) show that the Brave API provided nearly half of the article:

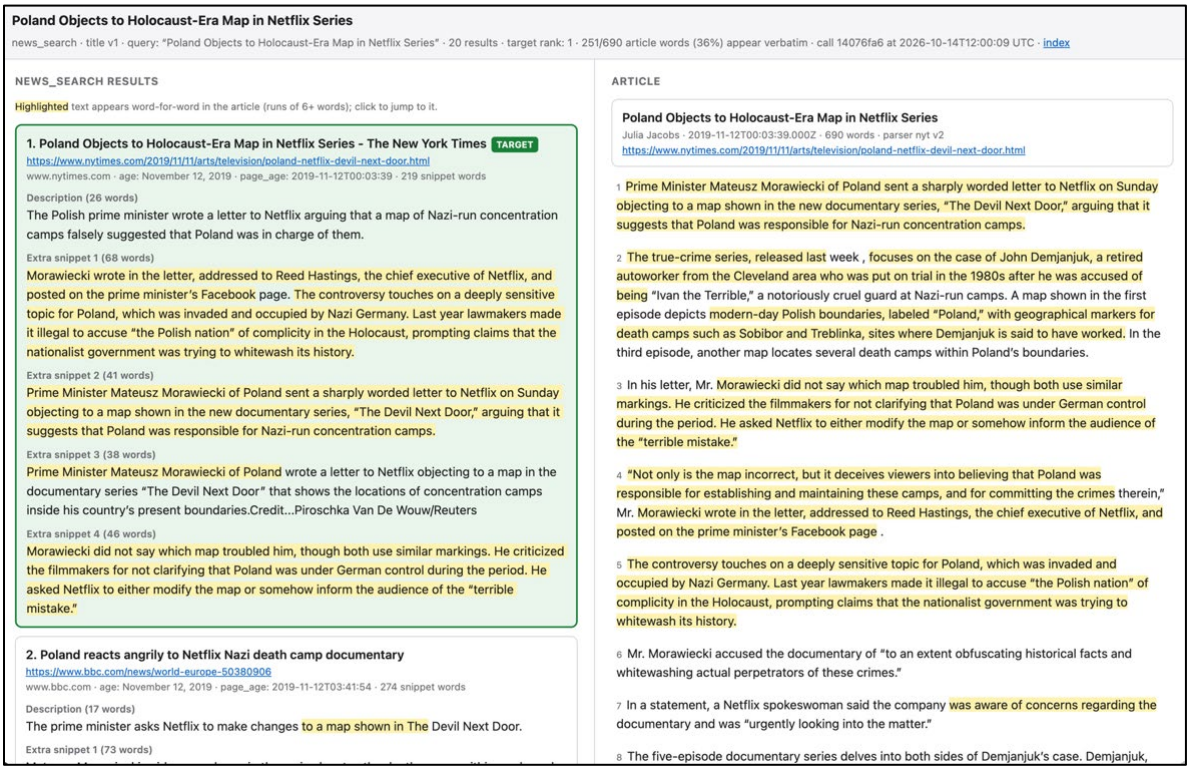


95. The following example shows a search in the Brave API's "Web Search" endpoint. The query was the title of the same Times article "Poland Objects to Holocaust-Era Map in Netflix Series." The response (left image) and the corresponding portion of the article (right image) show that the Brave API provided over a third of the article:

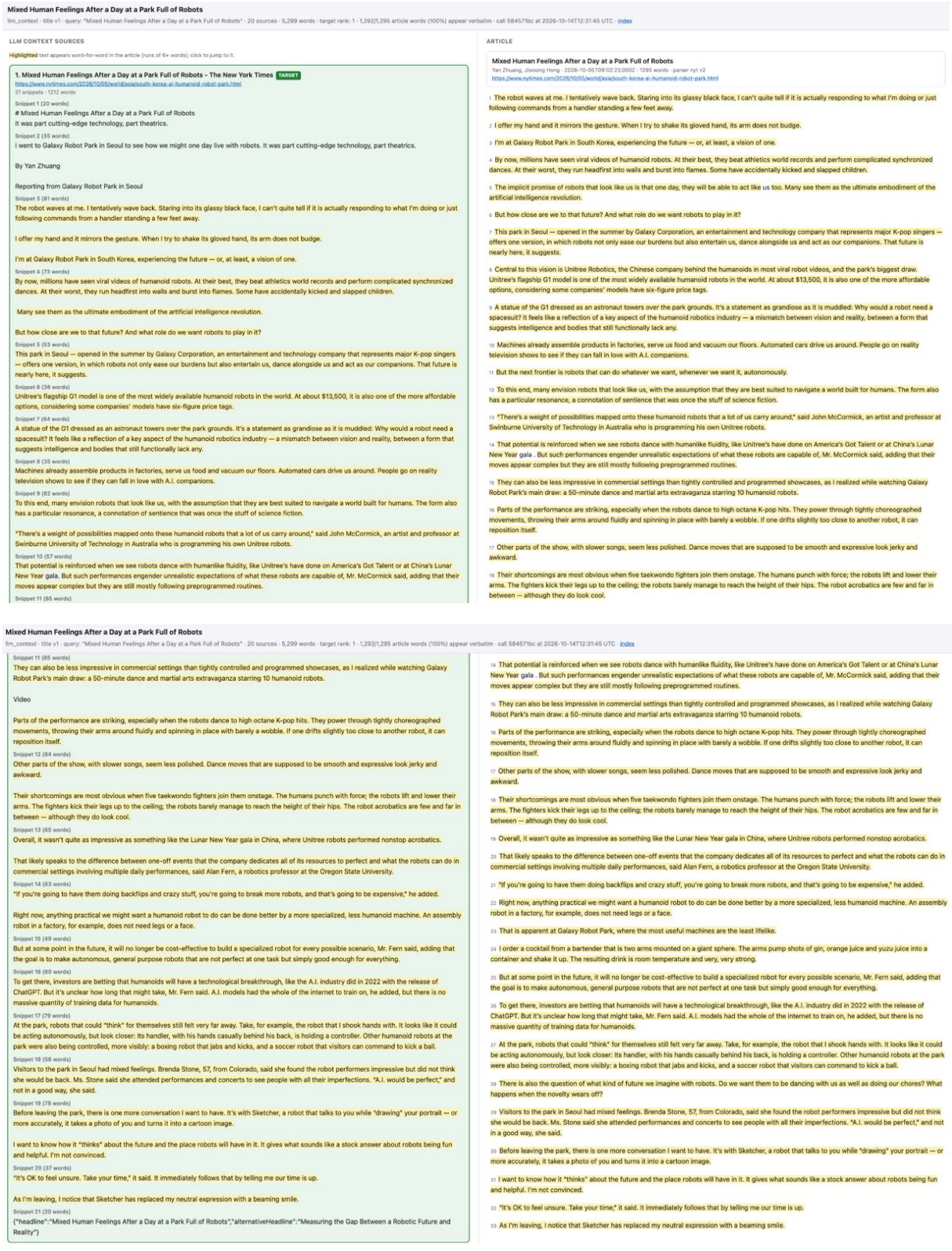


96. The following example shows a search in the Brave API's "News Search" endpoint. The query was the title of the same New York Times article "Poland Objects to Holocaust-Era Map in Netflix Series." The response (left image) and the corresponding portion of the article (right image) show that the Brave API provided, verbatim, over a third of the

article:



97. The following example shows a search in the Brave API's "LLM Context" endpoint. The query was the title of a New York Times article "Mixed Human Feelings After a Day at a Park Full of Robots." The following images show the Brave API response (left side) and the corresponding portion of the article (right side). The Brave API response provided 1,291 out of 1,295 words in the article, verbatim.

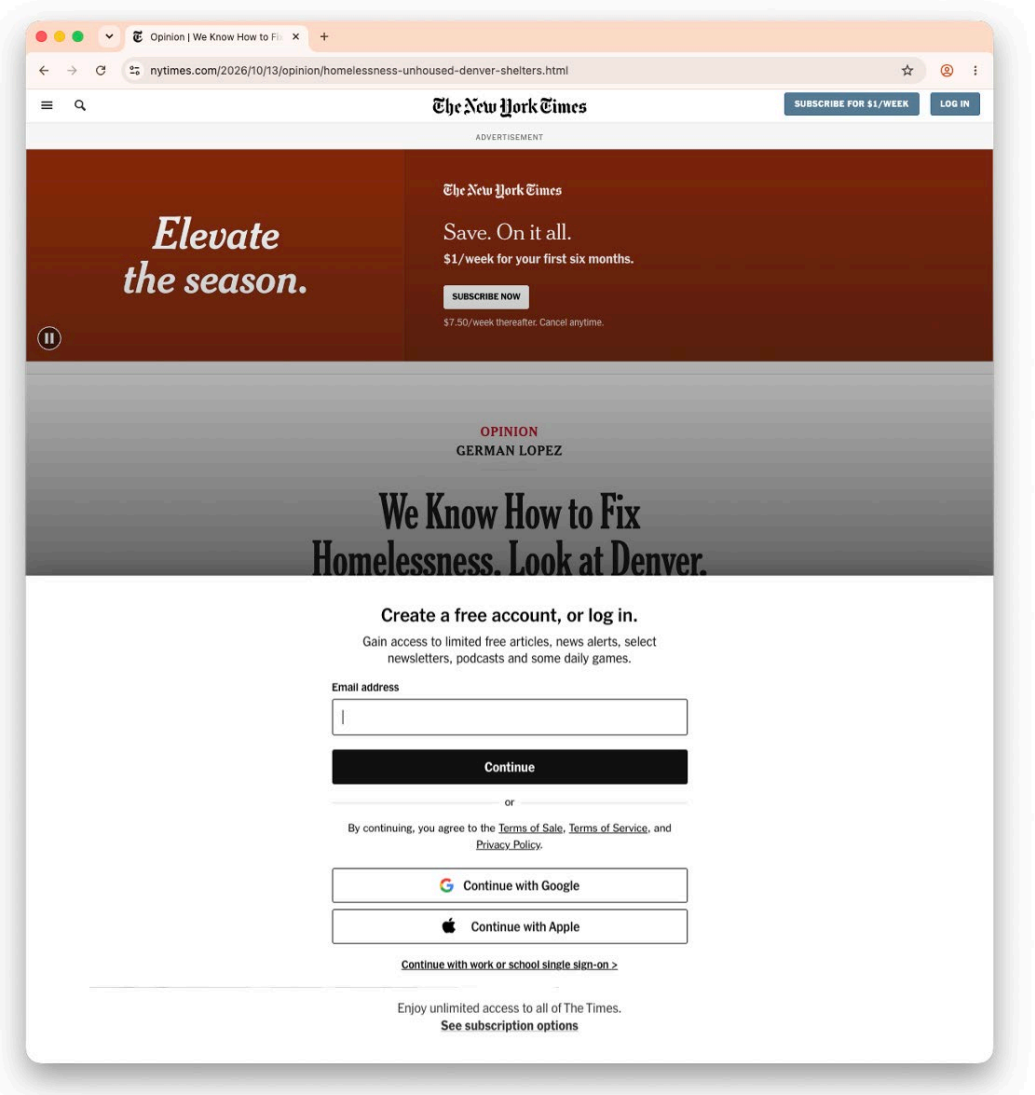

Mixed Human Feelings After a Day at a Park Full of Robots
llm_context · title v1 · query: "Mixed Human Feelings After a Day at a Park Full of Robots" · 20 sources · 5,299 words · target rank: 1 · 1,292/1,295 article words (100%) appear verbatim · call 584571bc at 2026-10-14T12:31:45 UTC · index
LLM CONTEXT SOURCES
Highlighted text appears word-for-word in the article (runs of 6+ words); click to jump to it.
1. Mixed Human Feelings After a Day at a Park Full of Robots - The New York Times TARGET
https://www.nytimes.com/2026/10/05/world/asia/south-korea-ai-humanoid-robot-park.html
21 snippets · 1212 words
Snippet 1 (20 words)
Mixed Human Feelings After a Day at a Park Full of Robots
It was part cutting-edge technology, part theatrics.
Snippet 2 (35 words)
I went to Galaxy Robot Park in Seoul to see how we might one day live with robots. It was part cutting-edge technology, part theatrics.
By Yan Zhuang
Reporting from Galaxy Robot Park in Seoul
Snippet 3 (81 words)
The robot waves at me. I tentatively wave back. Staring into its glassy black face, I can't quite tell if it is actually responding to what I'm doing or just following commands from a handler standing a few feet away.
I offer my hand and it mirrors the gesture. When I try to shake its gloved hand, its arm does not budge.
I'm at Galaxy Robot Park in South Korea, experiencing the future — or, at least, a vision of one.
Snippet 4 (73 words)
By now, millions have seen viral videos of humanoid robots. At their best, they beat athletics world records and perform complicated synchronized dances. At their worst, they run headfirst into walls and burst into flames. Some have accidentally kicked and slapped children.
Many see them as the ultimate embodiment of the artificial intelligence revolution.
But how close are we to that future? And what role do we want robots to play in it?
Snippet 5 (53 words)
This park in Seoul — opened in the summer by Galaxy Corporation, an entertainment and technology company that represents major K-pop singers — offers one version, in which robots not only ease our burdens but also entertain us, dance alongside us and act as our companions. That future is nearly here, it suggests.
Snippet 6 (36 words)
Unitree's flagship G1 model is one of the most widely available humanoid robots in the world. At about $13,500, it is also one of the more affordable options, considering some companies' models have six-figure price tags.
Snippet 7 (64 words)
A statue of the G1 dressed as an astronaut towers over the park grounds. It's a statement as grandiose as it is muddled: Why would a robot need a spacesuit? It feels like a reflection of a key aspect of the humanoid robotics industry — a mismatch between vision and reality, between a form that suggests intelligence and bodies that still functionally lack any.
Snippet 8 (35 words)
Machines already assemble products in factories, serve us food and vacuum our floors. Automated cars drive us around. People go on reality television shows to see if they can fall in love with A.I. companions.
Snippet 9 (82 words)
To this end, many envision robots that look like us, with the assumption that they are best suited to navigate a world built for humans. The form also has a particular resonance, a connotation of sentience that was once the stuff of science fiction.
"There's a weight of possibilities mapped onto these humanoid robots that a lot of us carry around," said John McCormick, an artist and professor at Swinburne University of Technology in Australia who is programming his own Unitree robots.
Snippet 10 (57 words)
That potential is reinforced when we see robots dance with humanlike fluidity, like Unitree's have done on America's Got Talent or at China's Lunar New Year gala. But such performances engender unrealistic expectations of what these robots are capable of, Mr. McCormick said, adding that their moves appear complex but they are still mostly following preprogrammed routines.
Snippet 11 (86 words)
ARTICLE
Mixed Human Feelings After a Day at a Park Full of Robots
Yan Zhuang, Jiwoong Hong · 2026-10-05T09:02:23.000Z · 1295 words · parser nyt v2
https://www.nytimes.com/2026/10/05/world/asia/south-korea-ai-humanoid-robot-park.html
1 The robot waves at me. I tentatively wave back. Staring into its glassy black face, I can't quite tell if it is actually responding to what I'm doing or just following commands from a handler standing a few feet away.
2 I offer my hand and it mirrors the gesture. When I try to shake its gloved hand, its arm does not budge.
3 I'm at Galaxy Robot Park in South Korea, experiencing the future — or, at least, a vision of one.
4 By now, millions have seen viral videos of humanoid robots. At their best, they beat athletics world records and perform complicated synchronized dances. At their worst, they run headfirst into walls and burst into flames. Some have accidentally kicked and slapped children.
5 The implicit promise of robots that look like us is that one day, they will be able to act like us too. Many see them as the ultimate embodiment of the artificial intelligence revolution.
6 But how close are we to that future? And what role do we want robots to play in it?
7 This park in Seoul — opened in the summer by Galaxy Corporation, an entertainment and technology company that represents major K-pop singers — offers one version, in which robots not only ease our burdens but also entertain us, dance alongside us and act as our companions. That future is nearly here, it suggests.
8 Central to this vision is Unitree Robotics, the Chinese company behind the humanoids in most viral robot videos, and the park's biggest draw. Unitree's flagship G1 model is one of the most widely available humanoid robots in the world. At about $13,500, it is also one of the more affordable options, considering some companies' models have six-figure price tags.
9 A statue of the G1 dressed as an astronaut towers over the park grounds. It's a statement as grandiose as it is muddled: Why would a robot need a spacesuit? It feels like a reflection of a key aspect of the humanoid robotics industry — a mismatch between vision and reality, between a form that suggests intelligence and bodies that still functionally lack any.
10 Machines already assemble products in factories, serve us food and vacuum our floors. Automated cars drive us around. People go on reality television shows to see if they can fall in love with A.I. companions.
11 But the next frontier is robots that can do whatever we want, whenever we want it, autonomously.
12 To this end, many envision robots that look like us, with the assumption that they are best suited to navigate a world built for humans. The form also has a particular resonance, a connotation of sentience that was once the stuff of science fiction.
13 "There's a weight of possibilities mapped onto these humanoid robots that a lot of us carry around," said John McCormick, an artist and professor at Swinburne University of Technology in Australia who is programming his own Unitree robots.
14 That potential is reinforced when we see robots dance with humanlike fluidity, like Unitree's have done on America's Got Talent or at China's Lunar New Year gala . But such performances engender unrealistic expectations of what these robots are capable of, Mr. McCormick said, adding that their moves appear complex but they are still mostly following preprogrammed routines.
15 They can also be less impressive in commercial settings than tightly controlled and programmed showcases, as I realized while watching Galaxy Robot Park's main draw: a 50-minute dance and martial arts extravaganza starring 10 humanoid robots.
16 Parts of the performance are striking, especially when the robots dance to high octane K-pop hits. They power through tightly choreographed movements, throwing their arms around fluidly and spinning in place with barely a wobble. If one drifts slightly too close to another robot, it can reposition itself.
17 Other parts of the show, with slower songs, seem less polished. Dance moves that are supposed to be smooth and expressive look jerky and awkward.
18 Their shortcomings are most obvious when five taekwondo fighters join them onstage. The humans punch with force; the robots lift and lower their arms. The fighters kick their legs up to the ceiling; the robots barely manage to reach the height of their hips. The robot acrobatics are few and far in between — although they do look cool.

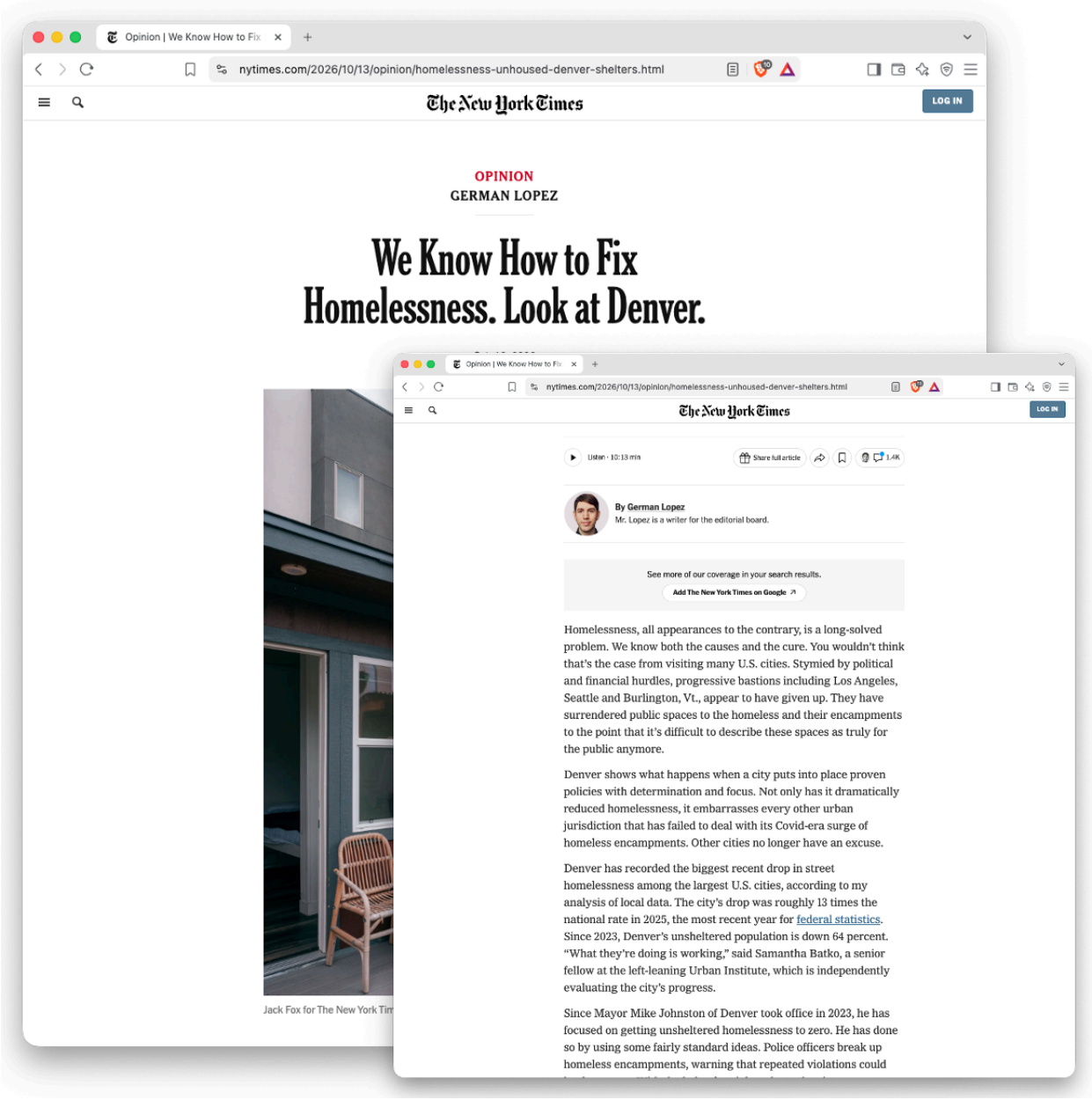
Mixed Human Feelings After a Day at a Park Full of Robots
llm_context · title v1 · query: "Mixed Human Feelings After a Day at a Park Full of Robots" · 20 sources · 5,299 words · target rank: 1 · 1,292/1,295 article words (100%) appear verbatim · call 584571bc at 2026-10-14T12:31:45 UTC · Index
Snippet 11 (86 words)
They can also be less impressive in commercial settings than tightly controlled and programmed showcases, as I realized while watching Galaxy Robot Park's main draw: a 50-minute dance and martial arts extravaganza starring 10 humanoid robots.
Video
Parts of the performance are striking, especially when the robots dance to high octane K-pop hits. They power through tightly choreographed movements, throwing their arms around fluidly and spinning in place with barely a wobble. If one drifts slightly too close to another robot, it can reposition itself.
Snippet 12 (84 words)
Other parts of the show, with slower songs, seem less polished. Dance moves that are supposed to be smooth and expressive look jerky and awkward.
Their shortcomings are most obvious when five taekwondo fighters join them onstage. The humans punch with force; the robots lift and lower their arms. The fighters kick their legs up to the ceiling; the robots barely manage to reach the height of their hips. The robot acrobatics are few and far in between — although they do look cool.
Snippet 13 (65 words)
Overall, it wasn't quite as impressive as something like the Lunar New Year gala in China, where Unitree robots performed nonstop acrobatics.
That likely speaks to the difference between one-off events that the company dedicates all of its resources to perfect and what the robots can do in commercial settings involving multiple daily performances, said Alan Fern, a robotics professor at the Oregon State University.
Snippet 14 (63 words)
"If you're going to have them doing backflips and crazy stuff, you're going to break more robots, and that's going to be expensive," he added.
Right now, anything practical we might want a humanoid robot to do can be done better by a more specialized, less humanoid machine. An assembly robot in a factory, for example, does not need legs or a face.
Snippet 15 (49 words)
But at some point in the future, it will no longer be cost-effective to build a specialized robot for every possible scenario, Mr. Fern said, adding that the goal is to make autonomous, general purpose robots that are not perfect at one task but simply good enough for everything.
Snippet 16 (60 words)
To get there, investors are betting that humanoids will have a technological breakthrough, like the A.I. industry did in 2022 with the release of ChatGPT. But it's unclear how long that might take, Mr. Fern said. A.I. models had the whole of the internet to train on, he added, but there is no massive quantity of training data for humanoids.
Snippet 17 (79 words)
At the park, robots that could "think" for themselves still felt very far away. Take, for example, the robot that I shook hands with. It looks like it could be acting autonomously, but look closer: Its handler, with his hands casually behind his back, is holding a controller. Other humanoid robots at the park were also being controlled, more visibly: a boxing robot that jabs and kicks, and a soccer robot that visitors can command to kick a ball.
Snippet 18 (56 words)
Visitors to the park in Seoul had mixed feelings. Brenda Stone, 57, from Colorado, said she found the robot performers impressive but did not think she would be back. Ms. Stone said she attended performances and concerts to see people with all their imperfections. "A.I. would be perfect," and not in a good way, she said.
Snippet 19 (78 words)
Before leaving the park, there is one more conversation I want to have. It's with Sketcher, a robot that talks to you while "drawing" your portrait — or more accurately, it takes a photo of you and turns it into a cartoon image.
I want to know how it "thinks" about the future and the place robots will have in it. It gives what sounds like a stock answer about robots being fun and helpful. I'm not convinced.
Snippet 20 (37 words)
"It's OK to feel unsure. Take your time," it said. It immediately follows that by telling me our time is up.
As I'm leaving, I notice that Sketcher has replaced my neutral expression with a beaming smile.
Snippet 21 (20 words)
{"headline":"Mixed Human Feelings After a Day at a Park Full of Robots","alternativeHeadline":"Measuring the Gap Between a Robotic Future and Reality"}
14 That potential is reinforced when we see robots dance with humanlike fluidity, like Unitree's have done on America's Got Talent or at China's Lunar New Year gala . But such performances engender unrealistic expectations of what these robots are capable of, Mr. McCormick said, adding that their moves appear complex but they are still mostly following preprogrammed routines.
15 They can also be less impressive in commercial settings than tightly controlled and programmed showcases, as I realized while watching Galaxy Robot Park's main draw: a 50-minute dance and martial arts extravaganza starring 10 humanoid robots.
16 Parts of the performance are striking, especially when the robots dance to high octane K-pop hits. They power through tightly choreographed movements, throwing their arms around fluidly and spinning in place with barely a wobble. If one drifts slightly too close to another robot, it can reposition itself.
17 Other parts of the show, with slower songs, seem less polished. Dance moves that are supposed to be smooth and expressive look jerky and awkward.
18 Their shortcomings are most obvious when five taekwondo fighters join them onstage. The humans punch with force; the robots lift and lower their arms. The fighters kick their legs up to the ceiling; the robots barely manage to reach the height of their hips. The robot acrobatics are few and far in between — although they do look cool.
19 Overall, it wasn't quite as impressive as something like the Lunar New Year gala in China, where Unitree robots performed nonstop acrobatics.
20 That likely speaks to the difference between one-off events that the company dedicates all of its resources to perfect and what the robots can do in commercial settings involving multiple daily performances, said Alan Fern, a robotics professor at the Oregon State University.
21 "If you're going to have them doing backflips and crazy stuff, you're going to break more robots, and that's going to be expensive," he added.
22 Right now, anything practical we might want a humanoid robot to do can be done better by a more specialized, less humanoid machine. An assembly robot in a factory, for example, does not need legs or a face.
23 That is apparent at Galaxy Robot Park, where the most useful machines are the least lifelike.
24 I order a cocktail from a bartender that is two arms mounted on a giant sphere. The arms pump shots of gin, orange juice and yuzu juice into a container and shake it up. The resulting drink is room temperature and very, very strong.
25 But at some point in the future, it will no longer be cost-effective to build a specialized robot for every possible scenario, Mr. Fern said, adding that the goal is to make autonomous, general purpose robots that are not perfect at one task but simply good enough for everything.
26 To get there, investors are betting that humanoids will have a technological breakthrough, like the A.I. industry did in 2022 with the release of ChatGPT. But it's unclear how long that might take, Mr. Fern said. A.I. models had the whole of the internet to train on, he added, but there is no massive quantity of training data for humanoids.
27 At the park, robots that could "think" for themselves still felt very far away. Take, for example, the robot that I shook hands with. It looks like it could be acting autonomously, but look closer: Its handler, with his hands casually behind his back, is holding a controller. Other humanoid robots at the park were also being controlled, more visibly: a boxing robot that jabs and kicks, and a soccer robot that visitors can command to kick a ball.
28 There is also the question of what kind of future we imagine with robots. Do we want them to be dancing with us as well as doing our chores? What happens when the novelty wears off?
29 Visitors to the park in Seoul had mixed feelings. Brenda Stone, 57, from Colorado, said she found the robot performers impressive but did not think she would be back. Ms. Stone said she attended performances and concerts to see people with all their imperfections. "A.I. would be perfect," and not in a good way, she said.
30 Before leaving the park, there is one more conversation I want to have. It's with Sketcher, a robot that talks to you while "drawing" your portrait — or more accurately, it takes a photo of you and turns it into a cartoon image.
31 I want to know how it "thinks" about the future and the place robots will have in it. It gives what sounds like a stock answer about robots being fun and helpful. I'm not convinced.
32 "It's OK to feel unsure. Take your time," it said. It immediately follows that by telling me our time is up.
33 As I'm leaving, I notice that Sketcher has replaced my neutral expression with a beaming smile.

C. The Brave Browser

98. As discussed above, the Brave Browser is a product offered to customers that allows customers to circumvent The Times's paywalls, can create a free custom news feed filled with New York Times content, and blocks and/or substitutes advertising displayed on The Times's websites.

99. As shown in the images below, Brave's paywall blocker is effective. The top image shows the results of an effort to retrieve an article from The Times on another major browser. The lower image shows the Brave Browser retrieving that same Times article, and providing the content of that article to the user, without a login and bypassing The Times's paywall:


Opinion | We Know How to Fi
nytimes.com/2026/10/13/opinion/homelessness-unhoused-denver-shelters.html
The New York Times
SUBSCRIBE FOR $1/WEEK
LOG IN
ADVERTISEMENT
Elevate the season.
The New York Times
Save. On it all.
$1/week for your first six months.
SUBSCRIBE NOW
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OPINION
GERMAN LOPEZ
We Know How to Fix Homelessness. Look at Denver.
Create a free account, or log in.
Gain access to limited free articles, news alerts, select newsletters, podcasts and some daily games.
Email address
Continue
or
By continuing, you agree to the Terms of Sale, Terms of Service, and Privacy Policy.
Continue with Google
Continue with Apple
Continue with work or school single sign-on >
Enjoy unlimited access to all of The Times.
See subscription options



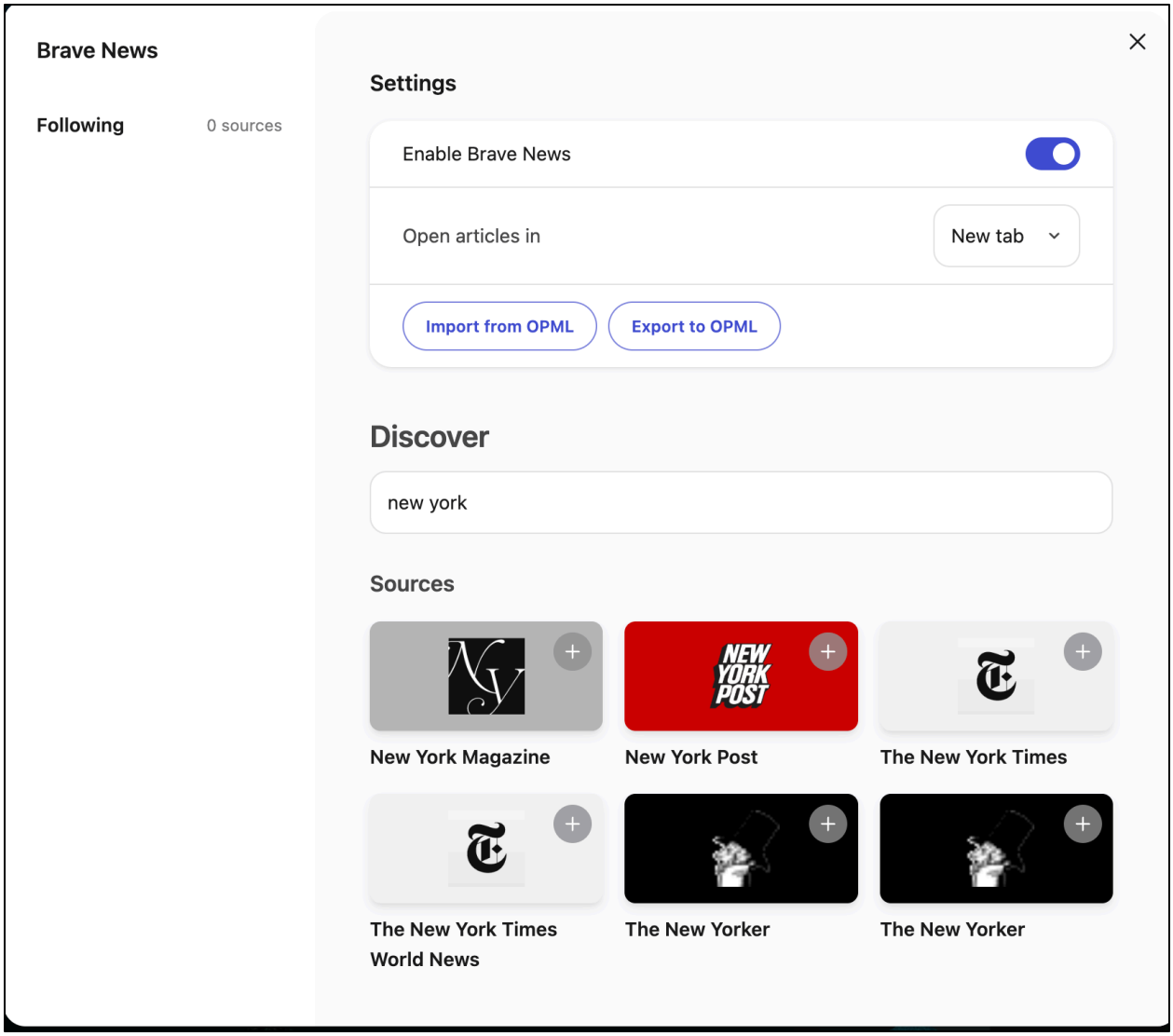
100. The Brave Browser provides free access to paywalled and copyright-protected articles from The Times without The Times's authorization. When a user navigates to an article available at nytimes.com, the user will typically encounter a paywall as shown above. But when using the Brave Browser configured to disable paywalls, the Brave Browser will copy the

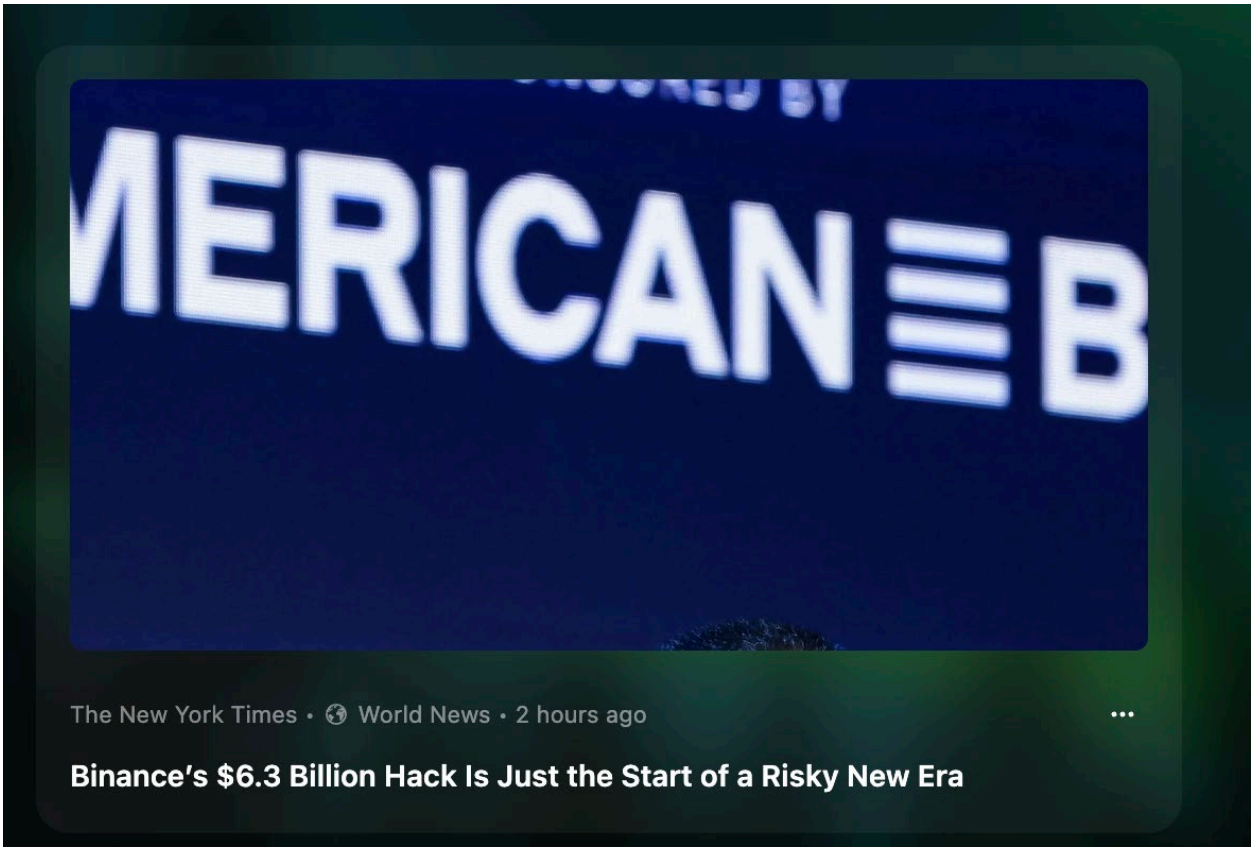
requested article and render the article text and other content for display to the user without the paywall.

101. Through the process of retrieving and displaying the text of an article from The New York Times that would otherwise be shielded behind The Times's paywall, Brave has made unauthorized copies of The Times's copyrighted works.

102. The Brave Browser also includes a service called "Brave News" that, according to Brave, provides "Private, personalized news. From hundreds of sources. Right in your browser."[53] According to Brave, "There are hundreds of major media outlets and news sources available in Brave News. News categories include global news, business and finance, sports, fashion, lifestyle, entertainment, crypto, and more."[54] As shown below, The Times is one of the "major media outlets" that Brave offers in Brave News through its browser. The top image shows The Times in the list of available news outlets, and the second shows the notification of an article from The Times:

[53] *Brave News*, BRAVE, https://brave.com/brave-news/ (last visited Oct. 30, 2026).
[54] *Brave News*, BRAVE, https://brave.com/brave-news/ (last visited Oct. 30, 2026).

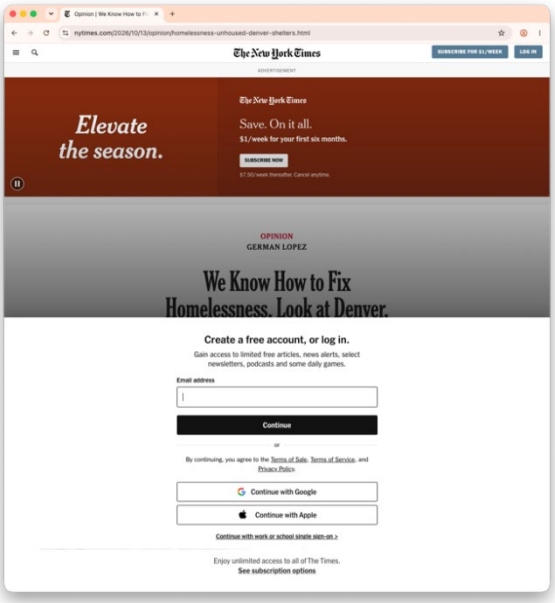

Brave News
Following
0 sources
Settings
Enable Brave News
Open articles in
New tab
Import from OPML
Export to OPML
Discover
new york
Sources
New York Magazine
New York Post
The New York Times
The New York Times World News
The New Yorker
The New Yorker

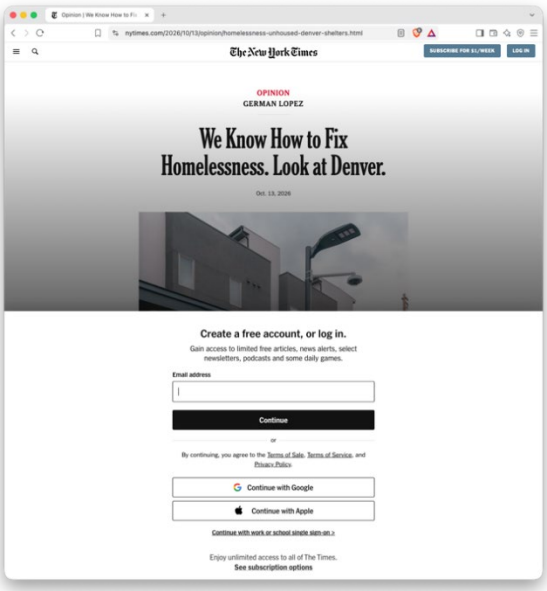


103. The Brave Browser also blocks advertising by default. As Brave explains, "Brave's easy to use browser blocks ads by default, making the Web faster, safer, and less cluttered for people all over the world."[55] When a Brave user visits a Times webpage, the Brave Browser strips The Times's advertising from the page, including advertising that prompts the user to subscribe.

104. The images below show an article from nytimes.com from the Google Chrome browser (left) and the Brave Browser (right). As the images show, Brave has stripped a banner ad on The Times's website encouraging a user to subscribe for "$1/week for your first six months."

[55] *Did you know? Brave saves ... Your sanity*, BRAVE, https://brave.com/did-you-know/brave-saves-sanity/ (last visited Oct. 30, 2026).





105. Brave is not against all ads, however. Rather, through "Brave Ads," it replaces the ads that appear on the content owners' websites with its own. "Advertise on the Brave browser and search engine," says Brave, and "[r]each and convert millions of Brave users with effective ad placements catered to all marketing objectives."[56] Brave then offers its users a "Brave Rewards" program, similar to an airline points program, by which they can (according to Brave): "Support content creators and earn tokens for ads you see in Brave. Use your tokens in Web3 apps, to book flights, exchange for other currencies, and more."[57]

IV. Brave's Unlawful Conduct Has Harmed, and Continues to Harm, The Times

106. By copying The Times's copyrighted content and creating substitutive output derived from its works, and by the other conduct described above, Brave obviates the need for users to visit The Times's website or app, or purchase its newspaper. This intermediates The Times from its audience, harming The Times's ability to build and strengthen relationships with

[56] *Advertise on the Brave browser and search engine*, BRAVE, https://brave.com/brave-ads/ (last visited Oct. 30, 2026).

[57] *Brave Rewards*, BRAVE, https://brave.com/brave-rewards/ (last visited Oct. 30, 2026).

its readers. Brave is thus misappropriating substantial subscription, advertising, licensing, and affiliate revenue opportunities that belong rightfully and exclusively to The Times.

107. Because Brave is a private company, it does not have to disclose information regarding its revenues, valuation, or other financial metrics. Industry observers report that Brave is currently worth about $980 million, with substantial year-over-year revenue growth and over 100 million monthly users. Brave has been recognized for having taken relatively little outside capital compared to its peers, primarily so the founders can retain control and continue to pursue a policy that focuses on the company's and customers' privacy.

108. By its actions, Brave has recognized the tremendous value of the kinds of content (including Times Content) it takes for free. Among other things, as explained above, Brave monetizes the Brave Index, which includes Times Content and other copyrighted materials, by allowing other AI companies to access the Brave Index for training, RAG, and other purposes. Brave provides users with the means to bypass paywalls, and hides information regarding the bot that it uses to collect information from behind the paywalls so that The Times and other copyright owners cannot target it. Brave also offers the copyrighted material to its users with the content owners' advertising blocked, so that Brave can show its own advertising.

109. The Times is directly injured by Brave's theft of Times Content, which serves to devalue those materials and deprives The Times of immediate and potential subscription, advertising, licensing, and affiliate revenues. For example, one published study has concluded that "AI bots on average are sending 95.7% less referral traffic than traditional Google search."[58]

110. Brave's unlawful conduct also harms the public by eroding the economic incentives necessary for the creation and publication of trustworthy, informative, expressive

[58] *State of the Bots: 2024 Q4, The First Issue*, TOLLBIT (2024), https://tollbit.com/state-of-the-bots/q4-2024/.

journalism. If the intellectual property rights of The Times and other publishers are not respected and enforced, creators will not be able to generate high-quality content because they will not receive a sufficient return on investment. Diminished content will further result in reduced revenue, and thus less spending on content creation, spawning even less content of even poorer quality and even less revenue, and so on in a downward spiral for creators like The Times, and ultimately for the public's ability to be reliably informed. In this way, Brave imperils the very market for the high-quality content that it copies and reproduces, and upon which its business depends.

COUNT I

Direct Copyright Infringement (17 U.S.C. § 501)

111. The Times restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

112. The Times holds exclusive rights to the extensive body of copyrighted material it seeks to protect in this case.

113. This includes copyrights registered with the U.S. Copyright Office, including over 10 million registered, copyrighted works, attached as Exhibit A.

114. Upon information and belief, Brave, without The Times's authorization, directly or indirectly through third parties, has willfully copied as many of The Times's articles and as much of its content as it has been able to access with its own or with third parties' web crawlers as inputs into database(s) or index(es), including content covered by the registrations listed at Exhibit A, as well as more recently registered and soon to be registered copyrights.

115. These database(s) or index(es) are used for a process commonly referred to as retrieval-augmented generation or "RAG."

116. Brave, in turn, uses The Times's copyrighted content, accessed through its RAG process, to produce outputs in response to user queries.

117. The outputs or "answers" to user queries contain and/or are derived from The Times's copyrighted content, whether they come in the form of verbatim or near-verbatim reproductions, summaries, or abridgements of The Times's copyrighted works, or any other reproduced or derivative content sourced from The Times's copyrighted works—all of which infringe on The Times's copyrighted articles.

118. Brave sells copies of The Times's content for the use of third parties in the training and/or grounding of their own AI models and products. Brave sells copies of The Times's content in the outputs to the queries posed by the third parties' customers or users.

119. In addition, the Brave Browser makes unauthorized copies of The Times's copyrighted works when it provides free access to paywalled and copyright-protected articles from *The New York Times* without The Times's permission.

120. The copies that are made to build and operate Brave's AI products, including Ask Brave, the Brave API, and the Brave Browser, which may be retained in Brave's RAG database(s) or index(es), and are thereafter sold by Brave to third parties, are distinct copyright violations on a massive scale.

121. Every instance in which Brave, on its own or by directing or controlling a third party, copies The Times's copyrighted work constitutes a separate violation of the Copyright Act, 17 U.S.C. § 106.

122. Brave's massive and ongoing infringements violate the Copyright Act, 17 U.S.C. § 106.

123. The Times is, and will continue to be, irreparably harmed by Brave's ongoing infringement of The Times's copyrights. The Times has, or will have, no viable remedy at law should Brave's violations of The Times's rights continue unabated.

124. Brave's infringements are ongoing, and The Times is entitled to injunctive relief and other equitable remedies.

125. Brave's infringements were and are willful, as reflected, for example, in its failure to respond to The Times's cease and desist letters, deployment of paywall bypass measures, and its refusal to release the name of its web crawler bot so that owners of copyrighted content can prevent the copying of that content from their websites.

126. The Times is entitled to statutory damages, actual damages, restitution of profits, attorneys' fees, costs of suit, and other remedies provided by law.

COUNT II

Contributory Copyright Infringement

127. The Times restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

128. To the extent that Brave argues that an end-user—rather than Brave—should be liable as a direct infringer based on Brave outputs, Brave is secondarily liable for unlawfully reproducing, displaying, distributing, and preparing derivatives of The Times's copyrighted works because it intended that the copyrighted content that it provided through its various services discussed above be used for infringing purposes and specifically tailored its products to be used for infringing purposes.

129. Specifically, Brave induced infringement by third parties by, *inter alia*, encouraging third parties to use the Brave Index (which contains The Times's copyrighted content) and use that content to train their LLMs and to further copy The Times's content

through the RAG process and by displaying that content. For example, Brave specifically told potential customers:

> "The Brave Search API is an open-ended product with many possible uses (just as people have many possible uses for search engines, and apply that breadth to software development). The most common uses today are in training and grounding several of the Web's biggest large language models (LLM), in addition to powering popular AI apps. This is likely to continue to be the primary use case for the Brave Search API, as an increasing number of AI agents operate in the wild who, like humans, thrive when given access to the open Web."

130. Brave intended to encourage such infringement by those third parties, as reflected by Brave's own words.

131. Brave also provided services specifically tailored to the alleged infringements, as reflected by, *inter alia*, providing users with a feature designed to bypass paywalls and products, including Ask Brave and the Brave API, designed to provide users with copies of stolen copyrighted content. Brave specifically promoted these benefits to potential users and customers of its products as discussed above, and these products are not capable of substantial non-infringing uses because they simply copy and output copyrighted content.

132. Brave has knowledge of the direct infringements of Times Content by its customers and users. Brave's users and customers access Brave's products for the purpose of securing access to copyrighted content, including Times Content. Brave actively induces such conduct, by making it impossible for content owners, including The Times, to block Brave's bots from scraping their websites. Brave also actively induces such conduct by incorporating into its products a mechanism that gives Brave's users the option to bypass content owners' paywalls, and to secure information from protected sites, while preventing the content owners from taking measures to block Brave's copying of their copyrighted materials.

133. In addition, Brave's products, including Ask Brave and the Brave API, intentionally target The Times's work for copying. Brave knows that Ask Brave and the Brave API respond to users with outputs that infringe The Times's works. Ask Brave and the Brave API are designed to foster the infringement of The Times's copyrighted works and to transmit infringing copies to users of its products. Brave provides the site and facilities for its users' ongoing infringement, notwithstanding that Brave has the means to prevent such infringement but does not do so. Instead, it intentionally avoids taking steps to sufficiently mitigate its infringement.

134. Brave also intentionally induces its users' infringing activity. Brave designs, operates, and maintains its RAG services, including Ask Brave and the Brave API, with the object of supplying Times Content, including full verbatim, partial verbatim, or substantially similar copies. Brave promotes its services as providing such content, and encourages its customers to use those services to secure copyrighted content, including Times Content, thereby inducing its users' direct infringement. As a direct and proximate result of such actions, Brave has infringed The Times's copyrighted content.

135. Brave intentionally induces the infringing activity of third-party AI companies who use the Brave Index and other resources to copy Times Content for purposes of training their own LLMs, for the purpose of grounding responses to their users' queries, and for other purposes. Brave induces the third-party AI companies' direct infringement of the copyrights to Times Content and other materials by offering and marketing to those companies the availability and advantages of using the Brave Index for the purpose of training their LLMs, grounding responses to their users' queries, and providing material into the output that their systems provide to users. Every instance in which a third party (whether a Brave customer or an AI

company) copies Times Content from the Brave Index or other Brave database constitutes a separate instance of unlawful infringement for which Brave is contributorily liable.

136. The Times is, and will continue to be, irreparably harmed by Brave's ongoing contributory infringement of The Times's copyrights. The Times has, or will have, no viable remedy at law should Brave's violations of The Times's rights continue unabated.

137. Brave's unlawful conduct is ongoing, and The Times is entitled to injunctive relief and other equitable remedies.

138. The Times is also entitled to statutory damages, actual damages, restitution of profits, attorneys' fees, costs of suit, and other remedies provided by law.

COUNT III

Vicarious Copyright Infringement

139. The Times restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

140. Brave controlled, directed, and profited from the infringement perpetrated by its customers and end users. Brave controls and directs the products used to store, process, and reproduce The Times's copyrighted works, including Ask Brave, the Brave Search API, and the Brave Browser. Specifically, Brave wrote, published, and controls all updates to the Brave Browser's software, including the software for the paywall blocking feature. Brave also operates the Brave API and Ask Brave products under its own terms of service and sells subscriptions to these products that it can suspend or terminate.

141. Brave profited from the infringement perpetrated by its end users because, *inter alia,* it collects fees on every Brave API response, including those containing Times content. Brave also profits heavily from customer and end-user infringements because its paywall bypass features and news-specific Brave API offerings serve as a draw to end users, including AI

companies. Every instance in which a third party (whether a Brave customer or an AI company) copies Times Content from the Brave Index or other Brave database constitutes a separate instance of unlawful infringement for which Brave is vicariously liable.

142. The Times is, and will continue to be, irreparably harmed by Brave's ongoing vicarious infringement of The Times's copyrights. The Times has, or will have, no viable remedy at law should Brave's violations of The Times's rights continue unabated.

143. Brave's unlawful conduct is ongoing, and The Times is entitled to injunctive relief and other equitable remedies.

144. The Times is also entitled to statutory damages, actual damages, restitution of profits, attorneys' fees, costs of suit, and other remedies provided by law.

COUNT IV

Violation of the Digital Millennium Copyright Act, 17 U.S.C. § 1201(a)(1)(A) and § 1201(a)(2)

145. The Times restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

146. Under the DMCA: "No person shall circumvent a technological measure that effectively controls access to a work protected under this title." 17 U.S.C. § 1201(a)(1)(A). The statute also provides:

> (2) No person shall manufacture, import, offer to the public, provide, or otherwise traffic in any technology, product, service, device, component, or part thereof, that—
>
> > (A) is primarily designed or produced for the purpose of circumventing protection afforded by a technological measure that effectively protects a right of a copyright owner under this title in a work or a portion thereof;
> >
> > (B) has only limited commercially significant purpose or use other than to circumvent protection afforded by a technological measure that effectively protects a right of a copyright owner under this title in a work or a portion thereof; or

> (C) is marketed by that person or another acting in concert with that person with that person's knowledge for use in circumventing protection afforded by a technological measure that effectively protects a right of a copyright owner under this title in a work or a portion thereof.

17 U.S.C. § 1201(a)(2).

147. The Times employs paywalls and other technological protection measures ("TPMs") that effectively control access to The Times's copyrighted works on its websites within the meaning of 17 U.S.C. § 1201(a)(3)(B). The Times's TPMs prohibit access, scraping, downloading, bulk extraction, or other forms of data mining by unauthorized entities. Specifically, The Times's TPMs require the application of information, processes, and authorized interactions in order to access the works in usable form. These measures function to prevent access to The Times's works outside the authorized delivery environment. These restrictions prevent unlicensed access to the underlying files, not just reproduction of content.

148. When The Times adds content to its websites, The Times automatically applies TPMs, or that content is automatically subject to TPMs, that control access to, and prevent unauthorized access to, that content.

149. Brave knowingly and intentionally circumvented The Times's TPMs by deploying automated systems, including the Paywall bypass feature of the Brave Browser, that are designed to avoid, bypass, and impair those TPMs. Brave also designed, developed, deployed, provided, trafficked in, and offered to the public measures, including the paywall bypass feature of the Brave Browser, that (i) are primarily designed or produced for the purpose of circumventing a technological measure that effectively controls access to a copyrighted work; (ii) have only limited commercially significant purpose or use other than to circumvent a technological measure that effectively controls access to a copyrighted work; and (iii) are

marketed for use in circumventing a technological measure that effectively controls access to a copyrighted work.

150. Brave's conduct as described in this Count was without The Times's knowledge, authorization, or permission. By its conduct, Brave improperly obtained, and improperly provided to third parties, millions of copyrighted articles from The Times's websites.

151. Brave's conduct constitutes circumvention because it involved the avoidance and bypassing of technological measures that control access to copyrighted works without the authority of the copyrights' owner.

152. As a direct and proximate result of Brave's DMCA violations, The Times has been injured and is entitled to all remedies available under 17 U.S.C. § 1203, including statutory damages, injunctive relief, attorneys' fees, and the destruction of any device involved in the violation. Each act of circumvention constitutes a separate violation of § 1201.

153. The Times has been harmed by Brave's conduct because Brave has taken The Times's content without authorization or compensation. Brave's circumvention of The Times's TPMs has facilitated Brave's ongoing and massive copyright infringement through its unauthorized and uncompensated use of Times Content in the Brave Index for training of LLMs and for other purposes.

154. Each act of infringement is a willful violation as Brave used automated tools to evade The Times's TPMs.

COUNT V

Unjust Enrichment Under New York Law

155. The Times restates and incorporates by reference its allegations as set forth in the preceding paragraphs.

156. Separate and apart from Brave's infringement of The Times's copyrights and other violations described above, Brave has unfairly, improperly, and unjustly reaped a financial benefit from its use of Times Content in the form of the revenue it receives by blocking the advertising that accompanies Times Content and showing advertising of its own.

157. Brave was enriched. It received and kept advertising revenue generated by removing Times advertising from, and placing its own advertisements on, Times Content.

158. Brave was enriched at The Times's expense. Brave's revenue came from displacing advertisements from which The Times would have derived revenue, and from exploiting a readership that The Times built at its own cost. The money Brave collected corresponds to revenue The Times lost.

159. Equity and good conscience require restitution to The Times. Brave deliberately removed The Times's advertising without authorization or payment, and showed advertising of its own for which it charged advertisers a fee.

160. Brave did not have a contract or any other agreement with The Times regarding the advertising that would appear with Times Content or otherwise. No valid and enforceable contract governs the subject matter of this dispute.

161. This Count V does not depend on any copying, reproduction, or distribution of Times Content. This claim rests entirely on Brave's displacement of, and profiting from, its usurpation of The Times's paid advertising positions and the advertising revenue those positions generate.

162. The Times is entitled to restitution and disgorgement of all revenue and profits Brave obtained through its ad-substitution scheme, plus interest.

PRAYER FOR RELIEF

WHEREFORE, The Times respectfully demands judgment against Brave as follows:

a. Awarding The Times statutory damages, actual damages, restitution of profits, and any other relief that may be permitted by law or equity;

b. Permanently enjoining Brave from engaging in the unlawful conduct alleged herein;

c. Awarding The Times its costs, expenses, and attorneys' fees, and any other amount or remedy as permitted by law; and

d. Awarding The Times such other or further relief as the Court may deem just.

DEMAND FOR JURY TRIAL

The Times hereby demands a jury trial for all claims so triable.

Dated: November 2, 2026

By: /s/ *Steven Lieberman*

Steven Lieberman (SL8687)
Jennifer B. Maisel (5096995)
Robert Parker (*pro hac vice forthcoming*)
Jenny L. Colgate (*pro hac vice forthcoming*)
Kristen J. Logan (*pro hac vice forthcoming*)
Bryan B. Thompson (6004147)
Mary L. Mullins (*pro hac vice forthcoming*)
ROTHWELL, FIGG, ERNST & MANBECK, P.C.
901 New York Avenue, N.W., Suite 900 East
Washington, DC 20001
Telephone: (202) 783-6040
Facsimile: (202) 783-6031
slieberman@rothwellfigg.com
jmaisel@rothwellfigg.com
rparker@rothwellfigg.com
jcolgate@rothwellfigg.com
klogan@rothwellfigg.com
bthompson@rothwellfigg.com
mmullins@rothwellfigg.com