

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

STATE BOARD OF ADMINISTRATION OF FLORIDA, on behalf of the FLORIDA RETIREMENT SYSTEM TRUST FUND, and NATIONAL CENTER FOR PUBLIC POLICY RESEARCH,	))))))	Index No. _____ IAS Part ____ Hon. _____, J.S.C.
Petitioners,	)	ORDER TO SHOW CAUSE
v.	)	(Petition Pursuant to CPLR Article 4 and
THE NEW YORK TIMES COMPANY,	)	Business Corporation Law § 624)
Respondent.	))	

Upon the reading and filing of the Petition of Petitioners State Board of Administration of Florida, on behalf of the Florida Retirement System Trust Fund (the “SBA”), and National Center for Public Policy Research (“NCPPR” and, together with the SBA, “Petitioners”), together with the exhibits annexed thereto, including the SBA’s demand for inspection dated August 10, 2026 (Exhibit 7), NCPPR’s demand for inspection dated May 29, 2026 (Exhibit 1), Respondent’s letters dated August 21, 2026 and June 5, 2026 refusing inspection (Exhibits 8 and 2), and Petitioners’ counsel’s letter dated August 26, 2026 narrowing the requested inspection (Exhibit 9); the Affirmation of Mark Goldfeder, Esq., dated September 23, 2026, and the exhibits annexed thereto; and upon all prior papers and proceedings had herein; and sufficient cause appearing therefor,

LET Respondent The New York Times Company (“Respondent” or the “Company”) show cause before this Court, at IAS Part ____, Room ____, of the Courthouse located at 60 Centre Street, New York, New York 10007, on the ____ day of _____, 2026, at _____

o'clock in the _____ of that day, or as soon thereafter as counsel may be heard, why an order and judgment should not be entered pursuant to Section 624(d) of the New York Business Corporation Law, common law, and Article 4 of the Civil Practice Law and Rules:

- (a) directing Respondent to permit Petitioners and/or their attorneys to inspect and copy the books and records requested in the SBA's demand dated August 10, 2026, as narrowed by Petitioners' counsel's letter dated August 26, 2026, and, upon such further showing as the Court may require, the balance of the books and records requested in that demand;
- (b) awarding Petitioners the costs of this proceeding, together with such further relief as the Court may deem just and proper under Business Corporation Law § 624(d), including attorneys' fees upon a showing that Respondent's refusal of inspection was made in bad faith; and
- (c) granting Petitioners such other and further relief as the Court deems just and proper;

and it is further

ORDERED that, pursuant to Business Corporation Law § 624(d), on the return date of this Order the Court shall hear the parties summarily, by affidavit or otherwise; and it is further

ORDERED that, pursuant to CPLR 403(d), service of a copy of this Order to Show Cause, together with the papers upon which it is granted, upon Respondent by [personal delivery to Respondent's registered agent or to an officer or managing agent of Respondent, pursuant to CPLR 311(a)(1) and BCL § 306] [and] [by electronic mail upon Respondent's counsel as listed in the Respondent's letters dated August 21, 2026 and June 5, 2026 refusing inspection (Exhibits 3 and 4)], on or before the _____ day of _____, 2026, shall be deemed good and sufficient service; and it is further

ORDERED that Respondent shall serve and file its answer and any answering papers, including any affidavits and memorandum of law in opposition, through the New York State Courts Electronic Filing System ("NYSCEF"), on or before the ____ day of _____, 2026; and it is further

ORDERED that Petitioners shall serve and file any reply papers through NYSCEF on or before the ____ day of _____, 2026; and it is further

ORDERED that this Order to Show Cause shall be served in lieu of a notice of petition, and that the return date set forth above shall be the return date of the Verified Petition for purposes of CPLR 403 and Business Corporation Law § 624(d).

Dated: New York, New York

_____, 2026

ENTER:

J.S.C.