WILSON SONSINI

AI/ML
ARTIFICIAL INTELLIGENCE AND MACHINE LEARNING

ALL EYES ON AI: REGULATORY, LITIGATION, AND TRANSACTIONAL DEVELOPMENTS

In This Issue

White House Releases AI Action Plan

On July 23, 2025, the White House released its AI Action Plan titled, "Winning the AI Race: America's AI Action Plan." The Plan presents three key pillars for advancing the U.S. as the global leader in Artificial Intelligence (AI): 1) Accelerating AI Innovation, 2) Building American AI Infrastructure, and 3) Leading in International AI Diplomacy and Security. The Trump Administration simultaneously announced three AI-related executive orders to implement recommendations outlined in the Plan.

The First Pillar of the Plan envisions accelerating AI innovation through several initiatives, including removing burdensome AI regulations, encouraging the adoption of AI within critical sectors through regulatory sandboxes, promoting open-source and open-weight AI models, promoting AI systems free from ideological biases, and investing in AI-enabled scientific developments. Notably, among the Plan's policy proposals for removing burdensome AI regulations, the Plan recommends withholding federal funding to states with burdensome AI regulations and repealing federal regulations that hinder AI innovation. The Plan also directs the Federal Trade Commission (FTC) to reassess ongoing AI-related investigations initiated by the Biden Administration and to reconsider final orders that unduly burden AI innovation.

The Second Pillar sets out policy recommendations to strengthen the U.S. AI infrastructure; namely, through initiatives focused on building and protecting the security of AI infrastructure. The Plan emphasizes information-sharing concerning AI vulnerabilities with the private sector, as well as across critical infrastructure sectors.

The Third Pillar provides policy recommendations concerning AI export controls and streamlining semiconductor production. The Plan restricts export controls on semiconductor manufacturing components to prevent their misuse by "countries of concern," including China, North Korea, Russia, and Iran. In addition, the Plan directs the U.S. Department of State to coordinate with the U.S. Department of Commerce to align with allies on AI export controls. Finally, the Plan recommends accelerating extraneous policy requirements for the U.S. Department of Commerce's CHIPS-funded semiconductor manufacturing projects.

For additional information, please see our recent Client Alert.

New York Requires Disclosures for Algorithmic Pricing

In May 2025, New York Governor Kathy Hochul enacted Part X of the state budget, establishing new disclosure requirements on the use of consumer data to set personalized algorithm-driven pricing and prohibiting the use of certain consumer data to set the pricing. Personalized algorithmic-driven pricing is generated by an algorithm using consumer data, which includes any data that identifies or links to a person or device, excluding location data. This legislation would require companies that are using algorithm-driven pricing (including via third-party tools) to disclose this fact to consumers by including visible and understandable language near the price as follows: "THIS PRICE WAS SET BY AN ALGORITHM USING YOUR PERSONAL DATA." Part X also prohibits the use of certain protected consumer data in pricing, such as ethnicity and age, to avoid discrimination and potential civil penalties. Part X aligns with a recent trend of increasing scrutiny from the FTC and antitrust authorities regarding data-driven pricing practices.

The National Retail Federation is challenging the law on First Amendment grounds, arguing it infringes on business rights by forcing them to use specific language. On July 14, 2025, the Office of the New York Attorney General agreed to a general stay of enforcement of the law until 30 days after the court's final order on the plaintiff's motion for a preliminary injunction. The New Attorney General subsequently filed a motion to dismiss the complaint on July 28, 2025, and oral argument is scheduled for September 2025.

For additional information, please see our recent Client Alert.

Texas Enacts AI Governance Law

On June 22, 2025, Texas Governor Greg Abbott signed House Bill 149, the Texas Responsible Artificial Intelligence Governance Act (TRAIGA), into law. TRAIGA will go into effect on January 1, 2026.

TRAIGA applies to a person that i) conducts business, promotes, or advertises in the state or produces a product or service consumed by residents of the state; or ii) engages in the development, distribution, or deployment of an AI system in the state. TRAIGA prohibits the development and deployment of AI systems for certain purposes, including i) behavioral manipulation, such as intentionally encouraging any person to physically harm themselves or others, engage in criminal activity, or circumvent informed decision-making by using deceptive trade practices; ii) political viewpoint discrimination; iii) unlawfully discriminating against a protected class under federal or state law; and iv) producing, assisting, or aiding in producing, or distributing child pornography or unlawful deepfake

videos or images. TRAIGA also includes certain prohibitions by government entities in the state.

TRAIGA establishes a regulatory sandbox program, which enables participants to temporarily develop and test AI systems without full regulatory compliance prior to deployment for up to three years. It also creates the Artificial Intelligence Council, which will recommend reforms to existing laws and regulations that impede innovation in AI development, recommend AI system usage to state agencies, and suggest improvements to the sandbox program, among other duties.

The Texas Attorney General (AG) has the authority to enforce TRAIGA. The AG must establish an online consumer complaint mechanism, and upon receiving a consumer complaint alleging a violation of TRIAGA, the AG may issue a civil investigative demand. After receiving a notice of violation from the AG, a developer or deployer has 60 days to cure the specified violation. A developer or deployer that fails to timely cure a violation is subject to an administrative fine of $10,000 to $12,000 per violation. By contrast, violations that are "uncurable" are subject to fines of $80,000 to $200,000 per violation. Continuing violations are subject to administrative fines of up to $40,000 per day.

Under TRAIGA, there are several affirmative defenses to liability for parties that discover and cure their own violation through i) feedback that the developer or deployer has received from a deployer or use; ii) testing; iii) an internal review process, provided that the developer or deployer is otherwise in compliance with a nationally recognized AI risk management framework, such as NIST's AI Risk Management Framework; or iv) following state agency guidelines.

Louisiana Becomes First State to Regulate AI-Generated Evidence

Louisiana has enacted the nation's first inclusive statewide framework for addressing AI-generated evidence in civil proceedings. HB 178, authored by Representative Michael Johnson and signed by Governor Jeff Landry with an effective date of August 1, 2025, requires attorneys to verify the authenticity of evidence through "reasonable diligence" before presenting it in court. HB 178 amends Article 371 of the Civil Code and provides that "if an attorney knew or should have known through the exercise of reasonable diligence that evidence was false or artificially manipulated,

the offering of that evidence without disclosure of that fact shall be considered a violation." Article 371 does not define what constitutes "reasonable diligence." HB 178 also amends Article 1551 and requires a party that suspects that an opposing party's exhibit has been falsified, including having been generated using AI, to raise that concern during the pretrial conference or hearing. This legislation reflects a significant step toward ensuring that existing duties of candor and evidentiary reliability extend to the use of AI-generated materials.

USPTO Taps AI to Accelerate Patent Review and Improve Examination Consistency

In June 2025, the U.S. Patent and Trademark Office (USPTO) announced a suite of AI-powered tools, including solutions for prior art search, application drafting, and procedural guidance, designed to assist patent and trademark examiners and reduce the time it takes to process applications.

Two AI tools currently in use ("More Like This Document" and "Similarity Search") analyze pending applications and compare them against a corpus of

more than 120 million domestic and international patent documents. These tools enable examiners to identify relevant prior art more efficiently and with greater consistency. Most recently, the USPTO launched "DesignVision," a tool that analyzes images in design patent applications and surfaces visually similar to prior filings.

Another key development is the agency's in-house generative AI platform, SCOUT (short for Searching, Consolidating, Outlining, and Understanding Tool). SCOUT is designed to aid in drafting and analysis, flagging inconsistencies in claims and retrieving answers from the Manual of Patent Examining Procedure (MPEP).

From a legal and operational perspective, these tools are notable for their integration into the official examination process. The USPTO has confirmed that AI-assisted search activity is disclosed in the prosecution history, and that applicants maintain their rights to

appeal any findings influenced by such tools.

To support continued innovation and scalability, the USPTO issued a Request for Information (RFI) on June 4, 2025, seeking input from U.S.-based providers of AI solutions that can assist with examination, including drafting office actions.

The agency's efforts also include making its massive data resources more accessible. USPTO has released nine petabytes of patent data—the foundation for its internal AI model training—for public download, with hopes that academia and industry will leverage these datasets for broader R&D and machine learning experimentation.

Taken together, these developments signal a significant step in the federal government's adoption of AI for administrative efficiency and underscore the USPTO's dual role in both regulating and utilizing emerging technologies.

European Commission Publishes Further Details of the EU AI Act as the GPAI Requirements Become Applicable on August 2, 2025

In the European Union (EU), the AI Act is becoming applicable in phases. As of February 2, 2025, certain AI practices are prohibited in the EU and companies providing or using AI must comply with AI literacy obligations. Over the coming year, many more requirements will start to apply. In preparation, the European Commission (EC), aided by the AI Office within it, is tasked with publishing guidance, templates and a code of practice, to support companies implementing the requirements in the AI Act. In addition, the deadline for each EU country to appoint the regulators that are competent to enforce the AI Act was August 2, 2025. Many EU countries are in the process of appointing regulators but missed this deadline to formalize the appointments.

The next phase of requirements to apply were those for new general-purpose AI (GPAI) models offered in the EU. As of August 2, 2025, all new GPAI models that are released in the EU must comply with the AI Act's requirements. On July 10, 2025, the EC published a Code of Practice for GPAI (Code) which details one way that providers of GPAI can comply with many of the GPAI requirements. Providers can choose whether to sign up to the voluntary Code, but those that choose not to may face increased scrutiny from regulators, as they will need to demonstrate AI Act compliance through alternative means. Due to the delay with publishing the Code, the EC has confirmed that signatories to the Code will be granted a year-long grace period (until August 2, 2026) to implement the requirements without

being fined for noncompliance. See here for more information on requirements for GPAI and the Code.

To complement the Code, the EC also published guidelines on key concepts related to GPAI models (see details of the draft guidelines here) and the AI Office has released the template that GPAI providers must use to publish the summary of training data, which they must do in addition to the obligations fleshed out in the Code.

CNIL Finalizes Guidance Developing AI Models Under the GDPR and Publishes Future AI Work Program

On July 22, 2025, the French Data Protection Authority (CNIL) announced that it has finalized its recommendations on the development of AI systems and the General Data Protection Regulation (GDPR) and published its future AI work program. The CNIL's AI recommendations are structured in 14 guidance sheets (available in French here and in English here—sheets 8 bis and 13 are not available yet in English). All guidance sheets were subject to public consultation in April and June 2024. After analyzing the consultation contributions, the CNIL has gradually published final versions of all the sheets.

The final versions of two important guidance sheets focusing on i) legitimate interest as a legal basis to train AI models and ii) the measures that must

be taken when relying on legitimate interest to collect data via web scraping were published on June 19, 2025. In addition to accounting for the public consultation, the recommendations were updated in light of the European Data Protection Board's Opinion on processing personal data in the context of AI models under the GDPR. The final recommendations confirm that legitimate interest can be a valid legal basis for AI model training, subject to some safeguards. The CNIL also provides a list of nonessential measures that AI providers may implement to help tip the

balance in favor of the processing as well as two additional lists of "must-have" and "nice-to-have" measures specifically for web scraping.

In parallel, the CNIL announced its plans for future work on AI. The program includes developing sectoral recommendations including for AI in education, health, and work. By the end of 2025, the CNIL will publish new recommendations on the responsibilities of other parties (non-developers) in the AI system creation chain (e.g., model designers, hosts, reusers, integrators) under the GDPR for public consultation. The CNIL, along with other stakeholders, is also developing suitable technical tools to support companies with implementing its recommendations.

New York Passes Novel Safeguards Law for AI Companions
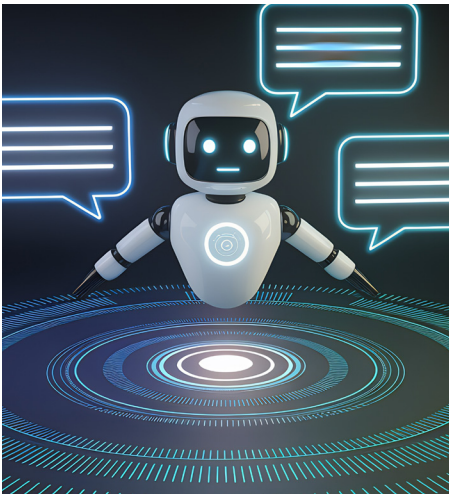
New York became the first state to pass a law requiring safeguards for AI companion apps, with the new requirements taking effect on November 5, 2025. The law applies to operators of AI companions with users in New York and defines these AI companions as AI systems that use AI, generative AI, or "emotional recognition algorithms" designed to simulate human-like relationships with users by retaining information from prior interactions, asking unprompted emotion-based questions that go beyond a direct response to a user prompt, and sustaining conversations about personal matters. Systems used solely for customer service, internal operations, employee productivity; or systems used primarily for efficiency improvements, research, or technical assistance are excluded. If your AI system falls under this definition, you must comply with several key obligations.

Operators must implement protocols to take reasonable measures to detect and respond to user expressions of suicidal ideation or self-harm, at a minimum, referring users to appropriate crisis services. Additionally, operators must disclose clearly and conspicuously— verbally or in writing—that users are interacting with AI, not a human. This disclosure must occur at least once daily and every three hours during ongoing interactions. Failure to comply can result in civil penalties of up to $15,000 per day, enforced by the New York Attorney General, with funds directed to a state suicide prevention fund.

For additional information, please see our recent Client Alert.

President Trump Signs the "TAKE IT DOWN Act"

The "TAKE IT DOWN Act," passed by Congress on April 28, 2025, and signed by President Trump on May 19, 2025, establishes new obligations for platforms hosting user-generated content. It criminalizes intentional publication of non-consensual intimate imagery, including computer-generated depictions (collectively, NCII), and it establishes a notice-and-takedown mechanism for NCII.

Criminal Liability. The law prohibits any person from using an interactive computer service to knowingly post an intimate visual depiction of an identifiable individual without consent, if the depiction i) was obtained or created under circumstances where there was a reasonable expectation of privacy, ii) was not exposed voluntarily in a public or commercial setting, iii) is not a matter of public concern, and iv) publication is intended to cause harm or causes harm to the depicted individual. Publishing

computer-generated content constitutes a violation if, rather than the first prong, it is done without the depicted person's consent. An individual's consent to the creation of an image or sharing it with another individual does not constitute consent to publication of an image. Exceptions to criminal liability apply to disclosures to law enforcement, reporting as part of a professional obligation, disclosure to assist the identifiable individual, or publication of one's own images. The law excludes child pornography, which remains subject to criminal prohibitions.

Civil Liability. Covered platforms, defined as those that primarily offer public forums for user-generated content, must establish a process for removing NCII and any known identical copies within 48 hours of receiving a valid report from the individual or their representative. In addition, platforms must provide clear and conspicuous notice of the removal

process. Failure to comply with the new notice and removal requirements constitutes an unfair or deceptive practice enforceable by the FTC. Platforms are protected from liability for good faith removals. The removal requirement goes into effect one year from enactment, giving businesses limited time to evaluate coverage, plan disclosure methods, and prepare the infrastructure necessary to respond to time-sensitive takedown requests.

For additional information, please see our recent Client Alert.

UK Medicines and Healthcare Products Regulatory Agency (MHRA) Leading the Way in Shaping the Use of AI in Healthcare

On June 24, 2025, the UK became the first country to join a new global network of health regulators focused on the safe and effective use of AI tools in healthcare. The UK MHRA will work with healthcare regulators, researchers, the National Institute for Health and Care Excellence and the NHS to shape the international standards on the use of AI in healthcare to support early diagnosis, cutting waiting times and backing growth in the UK's health tech sector.

Nevada Passes Law Limiting AI Use for Mental and Behavioral Healthcare

On June 5, 2025, Nevada Governor Joe Lombardo signed AB 406, a law regulating the use of AI for mental and behavioral healthcare. AB 406 prohibits offering AI systems designed to provide services that constitute the practice of professional mental or behavioral healthcare (such as therapy) and prohibits making representations that an AI system can provide such care. In addition, AB 406 limits how mental and behavioral healthcare professionals can use AI systems. AB 406 took effect on July 1, 2025.

AB 406 follows other states' efforts to regulate AI chatbots providing mental health services; namely, Utah's HB 452, which prohibits suppliers of mental health chatbots from engaging in targeted advertising based on any input from the user, among other prohibitions.

For additional information, please see our recent Client Alert.

Germany Sends Statement of Objections to Amazon over Price Control Mechanisms

On June 2, 2025, Germany's Federal Cartel Office (FCO) announced that it had sent formal charges (a Statement of Objections, or SO) to Amazon regarding its price control mechanisms for third-party sellers on its platform. The FCO claimed that Amazon's algorithms calculate constantly changing, dynamic maximum prices for products, and compare these with the offerings of third parties. If a price is judged to be too high and the price is qualified as a "price mistake," then Amazon delists the third-party offering from its marketplace. If a listing is placed in the categories of "too high price" or "uncompetitive price," then the listing is removed from the "Buy Box," or it may be ranked lower in the search results list, or it may become ineligible to be advertised on Amazon marketplace. If no product is priced conforming to Amazon's maximum price, then Amazon sends a request to the traders to adjust their prices to conform with the prices that Amazon believes are appropriate.

The SO is based both on a potential infringement of the general abuse prohibition of Article 102 of the Treaty on the Functioning of the European Union, and on the special abuse control provisions for designated large digital companies under Section 19a of the German Competition Act. The FCO designated Amazon under Section 19a in July 2022, which the German Supreme Court upheld in April 2024.

Japanese Market Study on Generative AI Markets

On June 6, 2025, the Japan Fair Trade Commission (JFTC) published a report on its first market study on generative AI in Japan. The JFTC received comments from consumers, companies, and trade associations, and interviewed domestic and foreign companies, experts, and authorities. The JFTC noted that the generative AI market is still emerging, while some respondents showed concern about future market consolidation.

The comments noted no specific issues about accessing semiconductor chips, and the JFTC said that supply had improved and that there was active innovation from diverse players in this space. The JFTC concluded that it should continue to monitor generative AI markets and exchange insights with other competition authorities to ensure a competitive environment.

Canada Seeks Feedback on Algorithmic Pricing and Competition

On June 10, 2025, the Competition Bureau Canada (the Bureau) published a discussion paper on algorithmic pricing for public consultation. The paper raises concerns that pricing algorithms could facilitate both explicit and tacit forms of competitor collaborations, including "hub-and-spoke" agreements. This could happen in a scenario where several competitors use the same third-party pricing algorithm that processes their data and dynamically sets prices to earn the highest combined profits for all firms. By pooling data from multiple competitors, the algorithm's pricing recommendations could

resemble collusive outcomes even if the competitors do not explicitly collaborate.

Interested parties had until July 22, 2025, to respond to the Bureau's paper.

Singapore Developing AI Antitrust Compliance Tool for Business Use

On June 12, 2025, a senior official at the Competition and Consumer Commission of Singapore (CCCS) told an antitrust conference that the CCCS was developing a tool to help businesses identify potential antitrust risks when deploying AI models and to assess whether their AI stacks comply with antitrust rules. Called "AI

Verify," the tool is supposed to flag competition concerns early in the design and implementation process, making it practical to use for businesses. The official described the tool as being in line with the CCCS's priority of engendering early compliance and supporting a pro-business environment in digital markets.

Portuguese Competition Authority (AdC) Highlights Labor Competition Concerns for AI

On July 25, 2025, the Portuguese Competition Authority (AdC) published a paper on access to talent and labor competition concerns in the AI sector.

The AdC identified that access to talent can be a bottleneck for companies seeking to develop AI capabilities. It analyzed several types of conduct that could be relevant under antitrust rules, including "acquihires" and "reverse acquihires," certain employment contract clauses that may limit labor mobility (e.g., confidentiality, non-compete, or IP assignment clauses), and no-poach and wage-fixing agreements between companies. The AdC concluded that reverse acquihires may qualify as a reportable merger under EU and national competition law, and that employment contract clauses restricting labor mobility are not inherently anticompetitive. In line with the European Commission's stance, the AdC views no-poach and wage-fixing agreements as restrictive by object and unlikely to be justified. Across Europe, national competition authorities have fined companies participating in such agreements.

SEC Formally Withdraws Predictive Data Analytics Rule Proposal

The Securities and Exchange Commission (SEC) has formally withdrawn certain notices of proposed rulemaking issued between March 2022 and November 2023, among which are the use of predictive data analytics by broker-dealers and investment advisors. The predictive analytics rule, originally proposed on July 26, 2023, would have required registered broker-dealers and investment advisers to identify conflicts of interests when using predictive data analytics technology in interactions with investors and adopt policies designed to eliminate the effect of those conflicts. The SEC does not intend to issue final rules with respect to these proposals. If the SEC decides to pursue future regulatory action in any of these areas, it will issue a new proposed rule.

Deal Highlights

Wilson Sonsini Advises Chime on IPO

On June 11, 2025, leading consumer financial technology company Chime announced the pricing of its initial public offering of its Class A common stock at $27.00 per share. Chime sold 30,700,765 shares in the offering and certain existing stockholders of Chime sold 6,099,235 shares in the offering. Wilson Sonsini advised Chime on the transaction. The shares began trading on the Nasdaq Stock Market on June 12, 2025, under the ticker symbol "CHYM." The offered closed on June 13, 2025.

Chime was created to help everyday people make progress in their financial lives. Through its direct relationships with FDIC-insured bank partners, Chime delivers easy-to-use products that address the most critical financial needs of everyday people—spending, saving, accessing liquidity, and building credit, all while avoiding punitive fees.

Wilson Sonsini Advises Thinking Machines on $2 Billion Round Led by a16z

On July 15, 2025, Thinking Machines Labs, the artificial intelligence start-up founded by former OpenAI executive Mira Murati, announced it has raised $2 billion in a financing round led by a16z with participation from NVIDIA, Accel, ServiceNow, Cisco, AMD, Jane Street, and more. Wilson Sonsini advised Thinking Machines on the transaction.

Wilson Sonsini Advises Grammarly on Acquisition of Superhuman

On July 1, 2025, Grammarly, the trusted AI assistant for communication and productivity, announced its intent to acquire Superhuman, an AI-native email platform that helps users respond one to two days faster and save four hours per

week on email communications. Wilson Sonsini advised Grammarly on the transaction.

Email is a critical communication surface in Grammarly's vision for an agentic future, where intelligent agents collaborate with users to streamline tasks and improve workflows. Currently, the company helps revise more than 50 million emails each week across over 20 providers, including Gmail, Outlook, Apple Mail, and Superhuman.

Superhuman brings deep adoption and measurable productivity gains to the platform, with over 94 percent of weekly active users leveraging AI, and sending and responding to 72 percent more emails per hour.

This transaction builds on Grammarly's recent acquisition of Coda—a collaborative workspace for managing AI agents across tasks like research, analysis, and content creation—and marks another step in the company's evolution toward a comprehensive AI productivity platform.

Wilson Sonsini Advises Clio on $1 Billion Acquisition of vLex

On June 30, 2025, Clio, the world's leading provider of legal technology, announced it has signed a definitive agreement to acquire vLex, a pioneer in legal intelligence that combines cutting-edge AI with the world's most comprehensive global legal research platform. The transaction is valued at $1 billion and will be paid in a combination of cash and stock. Wilson Sonsini is advising Clio on the transaction.

Clio's acquisition of vLex represents a significant advancement in Clio's platform development and a pivotal moment for the future of legal work. It merges Clio's widely trusted legal operating system, used by over 200,000 professionals, with vLex's innovative legal intelligence platform, featuring the AI, Vincent. This integration creates a new category of intelligent legal technology that enhances the ability of legal professionals to manage, research, and perform legal tasks within a cohesive system. The deal is expected to

Deal Highlights . . . *(Continued from page 9)*

close later in 2025, subject to customary closing conditions and regulatory approvals.

Wilson Sonsini Advises Scale AI on $14.35 Billion Investment from Meta

On June 12, 2025, Scale AI, Inc., the humanity-first AI company, announced a $14.35 billion investment from Meta Platforms, Inc. that values Scale at over $29 billion. The agreement will also substantially expand Scale and Meta's commercial relationship to accelerate deployment of Scale's data solutions. Wilson Sonsini advised Scale on the transaction.

In addition, Scale's founder, Alexandr Wang, is joining Meta to work on Meta's AI efforts. He will continue to serve as a director on Scale's board of directors and support Scale's ongoing work to unlock the power of AI and keep human values at the forefront.

Scale distributed proceeds from Meta's investment to Scale shareholders and vested equity holders, providing them with substantial liquidity as well as the opportunity to continue participating in Scale's success as ongoing equity holders of the company. Following its investment, Meta holds a minority of Scale's outstanding equity.

Wilson Sonsini Advises Plenful on $50 Million Series B Fundraise

On April 30, 2025, Plenful, the leading AI workflow automation platform modernizing healthcare operations, announced a $50 million Series B funding round. The round is co-led by Mitchell Rales, co-founder of Danaher Corporation, who also joins Plenful's board and Arena Holdings, with participation from Notable Capital, Bessemer Venture Partners, TQ Ventures, Susa/Kivu Ventures, and other leading investors. Wilson Sonsini advised Plenful on the transaction.

The Series B round brings Plenful's total funding to $76 million and will accelerate product development and go-to-market efforts to meet growing demand across the healthcare ecosystem.

Wilson Sonsini Advises Couchbase on $1.5 Billion Acquisition by Haveli Investments

Couchbase, the developer data platform for critical applications in AI, announced that it has entered into a definitive agreement to be acquired by Haveli Investments, a technology-focused investment firm, in an all-cash transaction valued at approximately

$1.5 billion. Wilson Sonsini is advising Couchbase on the transaction.

Under the terms of the agreement, Couchbase stockholders will receive $24.50 per share in cash, representing a 67 percent premium over the closing stock price on March 27, 2025, and a 29 percent premium over the price on June 18, 2025. The transaction is expected to close in the second half of 2025, pending stockholder and regulatory approvals, after which Couchbase will become a privately held company.

Wilson Sonsini Advises Jony Ive and LoveFrom on $6.5 Billion Acquisition of io Products by OpenAI

On July 9, 2025, OpenAI closed its acquisition of io Products, a hardware start-up company co-founded by Jony Ive, for approximately $6.5 billion in stock. Jony Ive and his design firm, LoveFrom, will remain independent and assume deep design and creative responsibilities across OpenAI. Wilson Sonsini advised Jony Ive and LoveFrom on the transaction.

Wilson Sonsini Represents Tenstorrent in Acquisition of Blue Cheetah

On July 1, 2025, Tenstorrent, a next-generation computing company building computers for AI, announced that it had acquired Blue Cheetah Analog Design, a start-up specializing in highly customized analog mixed-signal IP. Wilson Sonsini advised Tenstorrent on the transaction.

Blue Cheetah has been a key technology partner for Tenstorrent, developing advanced die-to-die interconnects used in its chiplet products. The acquisition follows a 2024 licensing agreement for Blue Cheetah's interconnect IP, further

Deal Highlights . . . *(Continued from page 10)*

deepening the strategic alignment between the companies. The acquisition brings Blue Cheetah's deep expertise in analog and mixed-signal design in-house to Tenstorrent, accelerating its chiplet roadmap and advancing its vision of an open chiplet ecosystem with optimized interconnects. Blue Cheetah's BlueLynx D2D IP supports multiple foundries and process nodes and is compatible with both Open Compute Project Bunch of Wires and Universal Chiplet Interconnect Express.

Wilson Sonsini Advises Landbase on $30 Million Series A Funding

In June 2025, Landbase, a San Francisco, California–based agentic AI company, announced their $30 million Series A funding. The round was led by Sound Ventures and Picus Capital, with participation from 8VC, A*, Firstminute Capital, and TheGP. Wilson Sonsini represented Landbase in the financing.

Led by CEO Daniel Saks, Landbase is an agentic AI company that automates go-to-market workflows for businesses. It has trained the GTM-1 Omni model on billions of data points, enabling organizations to launch highly relevant, omnichannel campaigns with minimal manual input. By combining machine intelligence with top human performance, the platform empowers businesses to scale their lead generation efforts autonomously, delivering proven success in improving conversion rates while lowering total cost of ownership.

Wilson Sonsini Advises Waypoint AI on $3.1 Million Pre-Seed

On June 26, 2025, Waypoint AI, the AI customer support engineer that triages, investigates, and resolves product defects, announced a $3.1 million pre-seed round led by 42CAP and Dreamcraft Ventures, with participation from Berkeley SkyDeck Fund and Lumiere AI Ventures. Wilson Sonsini advised Waypoint AI on the transaction.

Founded in 2024 by Tomas Polivka, Steve Boogar, and Liam Boogar-Azoulay, Waypoint AI has developed its AI Customer Support Engineer to supercharge escalation management. The newly added funds enable Waypoint

AI to rapidly grow its Prague-based engineering office as they continue to scale the platform to meet customer demand.

Wilson Sonsini Advises Trustible on $4.6 Million Series Seed

On June 10, 2025, Trustible™, a leading AI governance platform enabling safe and compliant AI adoption, announced a $4.6 million Series Seed financing, led by Lookout Ventures. Wilson Sonsini advised Trustible on the transaction.

Trustible's AI-enabled software platform has become a critical accelerator of AI adoption, helping organizations move beyond experimentation and into production. Proceeds from the financing will support Trustible's growth, enhancing its product capabilities and expanding its team.

Wilson Sonsini Advises J.P. Morgan Growth Equity Partners on Rogo's $50 Million Series B

On April 30, 2025, Rogo, a generative AI start-up focused on financial services, announced the completion of a $50 million Series B financing round led by Thrive Capital, with participation from new investors J.P. Morgan Growth Equity Partners, Tiger Global, and Positive Sum Ventures. Wilson Sonsini advised J.P. Morgan Growth Equity Partners on the transaction.

Rogo seeks to develop a financial AI analyst that combines data interpretation with creative insights. The company plans to use the additional funding to accelerate development of AI-driven financial reasoning models and autonomous AI agents.

Wilson Sonsini AI Advisory Practice Highlights

Wilson Sonsini attorneys provided AI-related guidance at the following events:

- On July 17, Amy Caiazza and Scott McKinney participated in a webinar titled, "AI-volution | Expect the Unexpected! Issues Wealthtechs Confront in Using AI." The webinar explored unexpected legal and regulatory questions wealthtech companies may face when using AI and addressed issues for registered investment advisers, broker-dealers, and the technology companies that partner with them.

- On June 25, Amy Caiazza and Scott McKinney gave a presentation on "The Intersection of AI Use and Unexpected Regulatory Requirements" to over 500 members of the Securities Industry and Financial Markets Association. The interactive presentation was targeted towards strategy officers, legal and compliance officers, and general counsels, and covered, among many other topics, the less obvious issues that the regulated financial firms would need to consider in conjunction with novel AI usage.

- On June 12, Jodi Daniel participated in a webinar discussing key findings from the National Academy of Medicine's new special publication of *An Artificial Intelligence Code of Conduct for Health and Medicine: Essential Guidance for Aligned Action*, drawing attention to the Code of Conduct Framework and applying the Code.

- On June 19-20, David Berger and Mark Baudler presented at the Second Annual Rome Conference on AI, Ethics, and Corporate Governance.

In addition, Wilson Sonsini attorneys provided AI-related guidance in the following publications:

- ***The Agentic Payment Playbook:*** Agentic payments are emerging as the next frontier in e-commerce, leveraging advancements in AI and digital payments. In this framework, AI agents are empowered to make purchasing decisions and execute payments on behalf of a user with minimal or no real-time human involvement. A cohesive legal strategy—one that clearly maps how the agentic payments solution fits within existing payments laws and regulatory frameworks—is essential to the solution's viability and long-term success.

  On July 3, 2025, Wilson Sonsini published "The Agentic Payments Playbook," authored by Jess Cheng, to help AI developers navigate legal complexities by laying out the key considerations that are critical for the viability and long-term success of agentic payments. These key considerations include the following: User Authorization, Attribution of Agent Behavior, Fairness & Adequate Disclosures, and Product Guardrails. The playbook is available here.

- ***AI in Wealthtech Field Guide:*** AI is driving advancements in the world of wealthtech to transform how investment recommendations are made, how trades are identified, and how companies communicate with clients and customers. On July 8, 2025, Wilson Sonsini published the *AI in Wealthtech Field Guide*, authored by Amy Caiazza. The guide highlights how these capabilities are being deployed in wealthtech to create portfolio management strategies that are increasingly tailored and data intensive. Common applications of AI in the industry include portfolio optimization, analyzing client behavior, and automated trading and compliance. Generative AI, namely in the form of chatbot programs, also supports more efficient and tailored client communication.

  Beyond improving processes, AI is also transforming investment intelligence and strategy. It enhances benchmark assessments and helps uncover signals that may generate alpha. Capable of drawing from alternative data sources—such as customer information, web-scraped content, and historical economic, political, and cultural data—AI systems can identify macro- and microeconomic trends and offer nuanced modeling and trading insights. However, the growing use of AI introduces a host of regulatory considerations. Personalized outputs may be treated as regulated "advice," and technology with a "black box" component may raise compliance concerns.

  Firms must clearly disclose client data use—especially for training purposes or eligibility decisions—and consider whether they have the right to use that data. Regulators also expect firms to implement cybersecurity policies specific to AI environments. In addition, firms are expected to maintain explainability, monitoring, and human oversight. AI-generated recommendations must align with the client's best interest, and potential conflicts of interest must be addressed. To keep pace with constantly evolving regulatory demands, firms must prioritize proper oversight, documentation, and a strong internal governance.

Newsletter Contributors

- Amy Caiazza
- Alice Cao
- Deirdre Carroll
- Jess Cheng
- Laura De Boel
- Julius Giesen
- Angela Guo
- Katherine Hernandez
- Jordan Jaffe

- Layan Khrais
- Jindrich Kloub
- Angelica Lee
- Mina Li
- Scott McKinney
- Maneesha Mithal
- Chris Murray
- Yann Padova
- Manja Sachet

- Hayden Stephens
- Taylor Stenberg Erb
- Hattie Watson
- Lori Westin
- Megan Xu
- Malcolm Yeary
- Roberto Yunquera Sehwani

The following attorneys have editorial oversight of Wilson Sonsini's All Eyes on AI: Regulatory, Litigation, and Transactional Developments.

Laura De Boel
ldeboel@wsgr.com

Jordan R. Jaffe
jjaffe@wsgr.com

Scott McKinney
scmc@wsgr.com

Maneesha Mithal
mmithal@wsgr.com

Manja Sachet
msachet@wsgr.com

WILSON SONSINI

650 Page Mill Road, Palo Alto, California 94304-1050 | Phone 650-493-9300 | Fax 650-493-6811 | www.wsgr.com

Wilson Sonsini has 17 offices in technology and business hubs worldwide. For more information, visit wsgr.com/offices.