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ELLYN S. GAROFALO

November 20, 2025

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Jones et al. v. Abel et al.*, Case No. 1:25-cv-00779-LJL

Dear Judge Liman:

As counsel for Jennifer Abel, Melissa Nathan, Justin Baldoni, and Wayfarer Studios LLC (collectively, the “Wayfarer Parties”), and pursuant to Your Honor’s Individual Rules, we move to seal Exhibits A, B, C, F, G, and H (Dkt. 170-1, 170-2, 170-3, 170-6, 170-7, and 170-8) to Plaintiff Jonesworks LLC and Stephanie Jones’s (“Jonesworks”) Letter Motion to Compel (Dkt. 169) (the “Motion”). The Wayfarer Parties also move to permanently seal the redactions in the Motion that refer to these exhibits. The Wayfarer Parties further join the motions to seal of non-parties Jed Wallace and Street Relations Inc. (Dkt. 181) and Katherine Case (Dkt. 183).

Exhibits A, B, C, F, G, and H and the related redacted sections of Jonesworks’s Motion¹ each contain confidential and sensitive information relating to the relationships between The Agency Group PR LLC and its clients and potential clients not involved in this litigation. Each exhibit and reference thereto includes sensitive and confidential information relating to clients and potential clients wholly unrelated to the parties or issues in this litigation.

We ask that the Court permanently seal Exhibits A, B, C, F, G, and H (Dkt. 170-1, 170-2, 170-3, 170-6, 170-7, and 170-8) as well as the portions of Jonesworks’ Motion that refer to these exhibits.

Further, Exhibit B (Dkt. 170-2) contains personally identifying information (“PII”) such as private telephone numbers that should be redacted prior to the exhibits being unsealed. In the event that the Court declines to seal the document in its entirety, this document should be

¹ A proposed redacted form of Exhibit F is submitted herewith. Because Exhibits A, B, C, G, and H and the Motion include testimony, documents, and discovery requests of other parties and non-parties, the Wayfarer Parties do not submit redacted copies of these documents, so as not to inadvertently disclose information other parties or non-parties may seek to maintain under seal pursuant to the Court’s Individual Rules. To the extent other parties or non-parties do not seek continued sealing of these exhibits of Jonesworks’ Motion and subject to guidance from the Court, the Wayfarer Parties are prepared to submit a redacted copy of these exhibits and the Motion reflecting the portions the Wayfarer Parties seek to maintain under seal.

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redacted to protect the confidential PII of parties and non-parties, pursuant to the Court's prior orders concerning the filing and redaction of PII. *See, e.g.*, Dkts. 485, 619, 736. The Wayfarer Parties ask that if the Court declines to seal the document in its entirety, the Court direct Jonesworks to publicly refile this document with all PII redacted from the document. *See, e.g.*, Dkt. 619.

The Wayfarer Parties respectfully request the Court grant this Motion and order the continued sealing of Exhibits A, B, C, F (with the attached redacted form to be filed publicly), G, and H (Dkt. 170-1, 170-2, 170-3, 170-6, 170-7, and 170-8) as well as the portions of Jonesworks' Motion that refer to these exhibits. In the alternative, if the Court does not permanently seal Exhibit B (Dkt. 170-2), the Wayfarer Parties request that the Court order the redaction of PII from the document.

Respectfully submitted,

/s/ Ellyn S. Garofalo

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