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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: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
rel. *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL**

Dear Judge Liman:

On behalf of Defendants Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal sections of the Opposition to Lively’s Motion for Spoliation Sanctions and Exhibits 1, 4, 5, 6, 7, 9, 12-17, 19, 21-23, 28-32, 34, 36, and 43 to the Declaration of Ellyn S. Garofalo, filed contemporaneously herewith.

Exhibits 1, 5, 12-15, and 29 are deposition testimony and documents produced by Plaintiff Blake Lively and designated by her as “Confidential.” Exhibits 34 and 43 are deposition testimony and a document produced by third party Katherine Case and designated by her as “Confidential.” Exhibits 4, 6, and 9 are excerpts of deposition testimony of third party Andrea Giannetti, which she designated as “Confidential.” Exhibit 28 is an excerpt of deposition testimony of third party Colleen Hoover, which she designated as “Confidential.” Exhibits 7, 16, 17, 21, 30, and 32 are documents produced by third party Sony Pictures Entertainment and designated as “Confidential.” Exhibit 36 is a document produced by third party Street Relations Inc. and designated as “Confidential.” Exhibits 19, 22, 23, and 31 are documents produced by third party William Morris Endeavor and designated as “Confidential” or “Confidential – Attorney’s Eyes Only.” The redacted portions of the Opposition memorandum similarly refer to the testimony contained in the aforementioned documents that were designated as “Confidential” or “Confidential – Attorney’s Eyes Only.” In accordance with Rule 4.b of Attachment A, the Wayfarer Parties respectfully request that the Court not rule on this letter-motion to seal for one week, so that the parties can meet and confer, and so that the parties and third parties may file motions for continued sealing if they so choose.

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In addition, the Wayfarer Parties respectfully request that the Court permanently seal Exhibits 11 and 44 to the Declaration of Ellyn S. Garofalo.

Exhibit 11 contains highly intimate and personal communications with third parties to this litigation, and therefore is highly confidential pursuant to the Protective Order. (Dkt. 125).

Exhibit 44 is the engagement agreement between the Wayfarer Parties and Liner Freedman Taitelman + Cooley, LLP (“Liner”), produced by Defendant Jennifer Abel. Its substantive contents are not relevant to the Motion or to the underlying dispute in this action. The substance of Exhibit 44 contains confidential and sensitive information relating to the attorney-client relationships between Liner and its clients, including attorney rates and other terms of the Wayfarer Parties’ engagement, and therefore is Confidential pursuant to the Protective Order. (Dkt. 125).

The Wayfarer Parties respectfully request the Court grant this Motion and order the permanent sealing of Exhibits 11 and 44.

Respectfully submitted,

/s/ Ellyn S. Garofalo

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