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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 Jonesworks’ Motion for Spoliation Sanctions and Exhibits 2, 5, 6, 7, 9-11, 13, 15, 20, 23-28, 30, 32-34, 39-43, 45, 47, 54, and 59 to the Declaration of Ellyn S. Garofalo, filed contemporaneously herewith.

Exhibits 5, 6, 13, 23-26, and 40 are deposition testimony and documents produced by Plaintiff Blake Lively and designated by her as “Confidential.” Exhibits 45 and 54 are deposition testimony and a document produced by third party Katherine Case and designated by her as “Confidential.” Exhibits 15 and 20 are excerpts of deposition testimony of third party Andrea Giannetti, which she designated as “Confidential.” Exhibit 39 is an excerpt of deposition testimony of third party Colleen Hoover, which she designated as “Confidential.” Exhibits 27, 28, 32, 41, and 43 are documents produced by third party Sony Pictures Entertainment and designated as “Confidential.” Exhibit 47 is a document produced by third party Street Relations Inc. and designated as “Confidential.” Exhibits 30, 33-34, and 42 are documents produced by third party William Morris Endeavor and designated as “Confidential” or “Confidential – Attorney’s Eyes Only.” Exhibits 7 and 9-11 are documents produced by third party Vanzan Inc. and designated as “Confidential.” Exhibit 59 is an excerpt of the deposition of Jed Wallace and is designated as “Confidential.” 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 22 and 55 to the Declaration of Ellyn S. Garofalo.

Exhibit 22 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 55 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 55 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 22 and 55.

Respectfully submitted,

/s/ Ellyn S. Garofalo

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