

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN  
BALDONI, JAMEY HEATH, STEVE  
SAROWITZ, IT ENDS WITH US MOVIE LLC,  
MELISSA NATHAN, THE AGENCY GROUP PR  
LLC, JENNIFER ABEL, JED WALLACE, and  
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL  
(consolidated with 1:25-cv-00449-LJL)

WAYFARER STUDIOS LLC, JUSTIN  
BALDONI, JAMEY HEATH, IT ENDS WITH US  
MOVIE LLC, MELISSA NATHAN, JENNIFER  
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE  
SLOANE, VISION PR, INC., and THE NEW  
YORK TIMES COMPANY.

Consolidated Defendants.

**DECLARATION OF MATTHEW F. BRUNO  
IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL**

I, Matthew F. Bruno, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Manatt, Phelps & Phillips, LLP, 7 Times Sq., New York, NY, 10036, and counsel of record for Plaintiff Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively’s renewed motion to compel Defendants Wayfarer Studios LLC (“Wayfarer”), 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 Defendants”) to produce the documents withheld for privilege and identified in Appendices A-D to the accompanying letter motion.

3. On November 25, 2025, the Wayfarer Defendants produced a fourth amended categorical privilege log. A true and correct copy of the Wayfarer Defendants’ fourth amended categorical privilege log, produced on November 25, 2025, is attached hereto as **Exhibit 1**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true.

Executed on this 1st day of December, 2025, in New York, New York.

Dated: December 1, 2025

/s/ Matthew F. Bruno\_\_\_\_\_

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