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VIA ECF

The Honorable Lewis J. Liman
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 1620
New York, NY 10007

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

Dear Judge Liman:

On behalf of Plaintiff Blake Lively, we write pursuant to Rule 4.b of Attachment A to Your Honor's Individual Rules to respectfully request that the Court preliminarily seal certain portions of Ms. Lively's Letter Motion to Compel, Appendices A-D attached thereto, and Exhibit 1 to the Declaration of Matthew F. Bruno, dated December 1, 2025, all filed contemporaneously herewith. Exhibits 1 is the Wayfarer Defendants' fourth amended privilege log and Appendices A-D are excerpts from the Wayfarer Defendants' fourth amended privilege log, all of which the Wayfarer Defendants designated "Confidential." The redacted portions of Ms. Lively's Motion similarly refer to the Wayfarer Defendants' fourth amended privilege log that was designated Confidential.

In accordance with Rule 4.b of Attachment A, Ms. Lively respectfully requests that the Court not rule on this letter-motion to seal for one week, so that the parties have the opportunity to meet and confer, and the Wayfarer Defendants may file a motion for continued sealing if they so choose.

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Respectfully submitted,

/s/ Esra A. Hudson

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