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December 2, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court for the 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**

On behalf of Plaintiff Blake Lively, 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”), and Third Party Defendant Jonesworks, LLC (collectively, the “Parties”) we write with the consent of the parties pursuant to Rules 1.D and 2.K of Your Honor’s Individual Practices in Civil Cases to clarify the scope of the parties’ so-ordered stipulation to extend deadlines for motions for continued sealing (ECF No. 1026) and the Court’s order extending deadlines to move for continued sealing of summary judgment materials (ECF No. 1098). These requests are made in the interest of party and judicial economy and to streamline the briefing on these upcoming sealing motions.

The parties would like to clarify that (1) these extensions of time to move for continued sealing apply to documents filed under seal pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules in connection with Jonesworks’ motion for spoliation sanctions (ECF No. 867) and (2) the January 9, 2026 deadline to oppose the sealing motions due on December 19, 2025 applies to materials relating to the summary judgment motions, oppositions, and replies.

To the extent not encompassed in prior orders, the parties jointly move for an order: (1) extending the deadline for motions for continued sealing in connection with Jonesworks’ spoliation motion to December 19, 2025, with responses due January 9, 2026, and (2) extending the deadline for responses to motions for continued sealing of summary judgment materials to January 9, 2026.

Respectfully submitted,

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