

December 2, 2025

**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.  
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC, et al.*, No. 1:24-cv-10049-LJL

Dear Judge Liman:

Pursuant to Paragraph 11 of the Case Management Plan and Scheduling Order, ECF No. 58, Plaintiff Blake Lively, Defendants Wayfarer Studios LLC, It Ends With Us Movie LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, Melissa Nathan, The Agency Group PR LLC, Jennifer Abel, and Third-Party Defendant Jonesworks LLC (collectively, the “Parties”) respectfully submit this joint letter in advance of the December 9, 2025 post-discovery status conference.

**1. Deadlines, Due Dates and/or Cut-Off Dates.**

December 3, 2025	Lively’s opposition to the Wayfarer Parties’ motion for judgment on the pleadings
December 3, 2025	Jonesworks’ opposition to Abel’s motion for summary judgment
December 3, 2025	Lively’s opposition to the Wayfarer Parties’ motion for summary judgment
December 3, 2025	The Wayfarer Parties’ opposition to Lively’s motion to compel
December 4, 2025	The Wayfarer Parties’ substantive response to Lively’s supplemental Rule 11 letter
December 8, 2025	Lively’s reply in support of her motion for spoliation sanctions
December 8, 2025	Jonesworks’ reply in support of motion for spoliation sanctions
December 12, 2025	Last day for expert discovery
December 12, 2025	The Wayfarer Parties’ reply in support of motion for summary judgment

December 12, 2025	The Wayfarer Parties' reply in support of motion for judgment on the pleadings
December 12, 2025	Jennifer Abel to reply in further support of her motion for summary judgment
December 19, 2025	Motions for continued sealing of materials submitted in connection with (1) the Wayfarer Parties' summary judgment motion, the opposition(s) and reply(ies); (2) the oppositions and replies to Lively's motion for spoliation sanctions; (3) Lively's supplemental letter motion re Rule 11, oppositions and replies
December 19, 2025	Motions for continued sealing of materials submitted in connection with Abel's summary judgment motion, the opposition(s) and reply(ies)
January 9, 2026	Opposition(s) to any motions for continued sealing of materials submitted in connection with the Wayfarer Parties' summary judgment motion, the opposition(s) and reply(ies)
January 9, 2026	Opposition(s) to any motions for continued sealing of materials submitted in connection with her motion for summary judgment, the opposition(s) and reply(ies)
January 23, 2026	Proposed Joint Pretrial Order, motions in limine, joint proposed verdict forms, joint voir dire questions due
January 30, 2026	Oppositions to motions in limine due
March 9, 2026	Trial

**2. Outstanding Motions** The following motions remain pending before the Court:

ECF Nos. 222, 229	Lively's and Reynolds's respective motions for sanctions pursuant to Rule 11
ECF 370	Leslie Sloane and Vision PR's motion for attorneys' fees and costs
ECF No. 543	Lively's motion for sanctions pursuant to Rule 16(f) and N.Y. Rule of Professional Conduct 3.6
ECF 703	Motions filed by non-party J. Alexander Townsend

ECF 733	Motion for sanctions pursuant to 28 U.S.C. 1927, filed by non-party McKenzie Folks
ECF No. 742	Lively's motion for attorney fees, treble damages, and punitive damages pursuant to Cal. Civ. Code § 47.1
ECF No. 810	The Wayfarer Parties' motion for judgment on the pleadings
ECF No. 862	Lively's motion for spoliation sanctions
ECF No. 867	Jonesworks' motion for spoliation sanctions
ECF No. 891	Lively's motion to preliminarily seal filed in connection with sanctions motion [The Wayfarer Parties did not file a motion to permanently seal]
ECF Nos. 899 and 932	Lively' motion to preliminary seal in connection with Rule 37 sanctions motion. The Wayfarer Parties moved to permanently seal some of the exhibits (ECF No. 932)
ECF No. 907	Lively's motion to preliminarily seal exhibits in connection with Lively's motion to compel production in connection with privilege log [The Wayfarer Parties did not file a motion to permanently seal]
ECF No. 937	Abel's motion to preliminarily seal in connection with her summary judgment motion
ECF No. 938	Abel's motion for summary judgment
ECF No. 952	The Wayfarer Parties' motion for summary judgment
ECF No. 979	The Wayfarer Parties' motion to preliminarily seal documents in connection with motion to supplement Lively and Reynolds' supplemental Rule 11 motions
ECF No. 990	Lively's motion to preliminarily seal portions of letter motion to compel directed to K. Case
ECF No. 1001	The Wayfarer Parties' motion to permanently seal exhibits to Jonesworks's motion to compel to K. Case
ECF No. 1002	The Wayfarer Parties' motion to permanently seal document in support of opposition to Lively's motion for spoliation sanctions

### **3. Status of Discovery**

Fact discovery is complete. The parties anticipate that expert discovery will be completed by the Court-ordered deadline of December 12, 2025.

**4. Settlement Discussions**

The Parties have nothing to report regarding the status of settlement negotiations at this time.

**5. Anticipated Length of Jury Trial.**

The parties agree that the case should be tried to a jury. Based on the substantial evidence adduced in the case to date, Lively anticipates that trial will take three weeks.

Third-Party Defendant Jonesworks requests that the third-party claims be bifurcated and tried separately after the main action. Jonesworks anticipates that a bifurcated trial of the third-party claims will take one week or less.

The Wayfarer Parties will oppose any motion by Jonesworks to bifurcate. Assuming all claims in Lively's Second Amended Complaint and Abel's cross-complaint against Jonesworks remain for trial, the Wayfarer Parties anticipate that trial will take four weeks.

**6. Summary Judgment and Other Issues.**

The Wayfarer Parties' motions for summary judgment and for judgment on the pleadings are pending. Abel's motion for summary judgment on her claim against Jonesworks is pending.

/s/ Ellyn S. Garofalo

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