

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

BLAKE LIVELY,

Plaintiff,

v.

No. 24-cv-10049 (LJL) (lead case)

WAYFARER STUDIOS LLC, et al.,

Defendants.

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

No. 25-cv-449 (LJL) (member case)

BLAKE LIVELY, et al.,

Defendants.

**DECLARATION OF MICHAEL J. GOTTLIEB IN SUPPORT OF
BLAKE LIVELY'S OPPOSITION TO THE WAYFARER PARTIES'
MOTION FOR SUMMARY JUDGMENT**

I, Michael J. Gottlieb, 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 Willkie Farr & Gallagher LLP, 1875 K Street NW, Washington, DC 20006, and counsel of record for Plaintiff Blake Lively in the above-captioned action. I respectfully submit this declaration in support of Ms. Lively's Opposition to the Wayfarer Parties' Motion for Summary Judgment.

2. The purpose of this declaration is to submit and identify for the Court true and correct copies of the following documents and testimony referenced in Ms. Lively's Opposition to the Wayfarer Parties' Motion for Summary Judgment.

3. The attachment to this declaration lists, by exhibit number and description, Exhibits 1–150 attached hereto. Each of these documents is a true and correct version. In certain instances, only excerpts of certain transcripts have been included.

4. Some of the exhibits cannot be filed via ECF because of their size and/or format. Ms. Lively will provide those exhibits directly to the other parties and the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 3, 2025

/s/ Michael J. Gottlieb

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Attachment A

Lively Exhibit No.	Bates No. / Citation	Document Description
1	Hoover Tr.	Colleen Hoover Dep. Tr. Excerpts
2	Giannetti Tr.	Andrea Giannetti Dep. Tr. Excerpts
3	Heath 10/8 Tr.	Jamey Heath 10/8/25 Dep. Tr. Excerpts
4	Baldoni 10/7 Tr.	Justin Baldoni 10/7/25 Dep. Tr. Excerpts
5	N/A	INTENTIONALLY OMITTED
6	BL-000038637	[REDACTED]
7	BALDONI_000016476	[REDACTED]
8	AS000701	Email between A. Saks to T. Black, J. Baldoni, and J. Heath
9	HEATH_000046085	[REDACTED]
10	Ferrer Tr.	Isabela Ferrer Dep. Tr. Excerpts
11	Sarowitz Tr.	Steve Sarowitz Dep. Tr. Excerpts
12	Slate Tr.	Jennifer Slate Dep. Tr. Excerpts
13	Baker Tr.	Vivian Baker Dep. Tr. Excerpts
14	Talbot Tr.	Elizabeth Talbot Dep. Tr. Excerpts
15	Saks Tr.	Alexandria Saks Dep. Tr. Excerpts
16	Baker Ex. 1	[REDACTED]
17	Robbins Tr.	Michael Robbins Dep. Tr. Excerpts
18	24-CV-10049_0003488	[REDACTED]
19	24-CV-10049_0003611	[REDACTED]
20	Baldoni 10/6 Tr.	Justin Baldoni 10/6/25 Dep. Tr. Excerpts
21	BENSON_0001	[REDACTED]

22	BL-000008819	[REDACTED]
23	Carroll Tr.	Shelley Anne Carroll Dep. Tr. Excerpts
24	Heath 10/9 Tr.	Jamey Heath 10/9/25 Dep. Tr. Excerpts
25	HEATH_000046126	[REDACTED]
26	BL-000021684	[REDACTED]
27	BL-000007953	[REDACTED]
28	Security Tr.	Security Guard Dep. Tr. Excerpts
29	Security Errata	Security Guard Dep. Tr. Errata Sheet
30	SPE_BL0002026	[REDACTED]
31	HEATH_000035492	[REDACTED]
32	WAYFARER_000140991	Email between I. Meziane and L. Strasberg
33	Stone Tr.	Justin Stone Dep. Tr. Excerpts
34	Zavala Tr.	Warren Zavala Dep. Tr. Excerpts
35	WAYFARER_000140115	[REDACTED]
36	BALDONI_000033560	[REDACTED]
37	SAROWITZ_000000080	[REDACTED]
38	Greenstein Tr.	[REDACTED]
39	SPE_BL0006375	[REDACTED]
40	SPE_BL0002044	[REDACTED]

		[REDACTED]
41	Greenberg Tr.	Danny Greenberg Dep. Tr. Excerpts
42	SPE_BL0019748	[REDACTED]
43	SPE_BL0002183	[REDACTED]
44	BALDONI_000026193	[REDACTED]
45	BALDONI_000018852	[REDACTED]
46	NATHAN_000005497	[REDACTED]
47	NATHAN_000005552	[REDACTED]
48	BALDONI_000018710	[REDACTED]
49	JONESWORKS_00013779	[REDACTED]
50	JONESWORKS_00016237	[REDACTED]
51	NATHAN_000002711	[REDACTED]
52	Abel 9/26 Tr.	[REDACTED]
53	JONESWORKS_00014980	[REDACTED]
54	JONESWORKS_00015509	[REDACTED]
55	JONESWORKS_00016351	[REDACTED]
56	NATHAN_000003433	[REDACTED]
57	Case Tr.	Katherine Case Dep. Tr. Excerpts
58	Vituscka000001	[REDACTED]
59	KCASE-000002821	[REDACTED]
60	BBKOSLOW-000001024	[REDACTED]

61	KCASE-000004756	[REDACTED]
62	Koslow Tr.	[REDACTED]
63	BALDONI_000015463	Texts between J. Baldoni, J. Abel, J. Heath, K. Case, B. Koslow, M. Nathan, and M. Mitchell
64	KCASE-000003354	[REDACTED]
65	BALDONI_000019422	Texts between J. Baldoni, J. Abel, J. Heath, M. Mitchell, and M. Nathan
66	JONESWORKS_00012744	Texts between J. Abel, J. Heath, and M. Nathan
67	HEATH_000048496	[REDACTED]
68	Sloane Tr.	[REDACTED]
69	JONESWORKS_00016247	[REDACTED]
70	Culotta Report	Expert Report of Aron Culotta
71	WAYFARER_000136136	Texts between J. Heath, J. Abel, B. Butler, M. Mitchell, M. Nathan, and K. Case
72	SAROWITZ_000000036	[REDACTED]
73	BALDONI_000018698	[REDACTED]
74	BBKOSLOW-000002644	[REDACTED]
75	SAROWITZ_000000918	[REDACTED]
76	HEATH_000028508	[REDACTED]
77	HEATH_000045258	[REDACTED]

78	HEATH_000045271	[REDACTED]
79	WAYFARER_000140109	[REDACTED]
80	HEATH_000041865	[REDACTED]
81	BL-000039376	[REDACTED]
82	BL-000039339	[REDACTED]
83	BL-000039357	[REDACTED]
84	BL-000039395	[REDACTED]
85	BL-000039396	[REDACTED]
86	SPE_BL0008705	[REDACTED]
87	Family Hive 9/29 Tr.	[REDACTED]
88	WAYFARER_000076684	[REDACTED]
89	Hanks Tr.	Tera Hanks Dep Tr. Excerpts (p.)
90	BALDONI_000018802	[REDACTED]
91	WME_00000456	[REDACTED]
92	BALDONI_000018877	[REDACTED]
93	BALDONI_000018832	[REDACTED]
94	RR-SUBPOENA-000000039	[REDACTED]
95	BL-000021653	[REDACTED]
96	Freyd Report	Expert Report of Jennifer Freyd
97	HEATH_000046097	[REDACTED]
98	HEATH_000046098	[REDACTED]
99	HEATH_000026761	[REDACTED]
100	HEATH_000045410	[REDACTED]

101	HEATH_000046138	[REDACTED]
102	WAYFARER_000138396	[REDACTED]
103	SPE_WF0000210	[REDACTED]
104	BL-000009292	[REDACTED]
105	BL-000011236	[REDACTED]
106	BL-000008964	[REDACTED]
107	BL-000008982	[REDACTED]
108	BL-000008209	[REDACTED]
109	BL-000011630	[REDACTED]
110	BALDONI_000017205	[REDACTED]
111	HEATH_000028930	[REDACTED]
112	BL-000009215	[REDACTED]
113	BL-000008715	[REDACTED]
114	BL-000008353	[REDACTED]
115	BL-000011242_A	[REDACTED]
116	BL-000011647	[REDACTED]
117	BL-000018460	[REDACTED]
118	BL-000011088	[REDACTED]
119	BL-000009127	[REDACTED]
120	BL-000008567	[REDACTED]
121	BL-000009267	[REDACTED]

122	BL-000009642	[REDACTED]
123	BALDONI_0000170003	[REDACTED]
124	Robbins Report	Expert Report of Michael Robbins
125	SPE_BL0002193	[REDACTED]
126	AS000062	Email between A. Saks, J. Heath, I. Meziane, A. Lieberman, and A. Ajemian
127	HEATH_000048499	[REDACTED]
128	BALDONI_000016497	[REDACTED]
129	WAYFARER_000138094	[REDACTED]
130	SALADINO_0000011	[REDACTED]
131	AS004588	Email between J. Baldoni, A. Saks, A. Giannetti, J. Heath, A. Calof, and A. Marbory
132	Dkt. 748-2	C. Ayoub Declaration
133	BALDONI_000032905	[REDACTED]
134	24-cv-10049_0002473	[REDACTED]
135	24-CV-10049_0002634	[REDACTED]
136	HEATH_000051557	[REDACTED]
137	BL-000020972	[REDACTED]
138	N/A	[REDACTED]
139	N/A	[REDACTED]
140	24-cv-10049_0003313	[REDACTED]

141	24-cv-10049_0001097	[REDACTED]
142	24-cv-10049_0001426	[REDACTED]
143	Scene 40_1_A	[REDACTED]
144	Scene 40_1_B	[REDACTED]
145	Scene 40_2_B	[REDACTED]
146	BALDONI_000031947	[REDACTED]
147	HEATH_000007969	[REDACTED]
148	SPE_BL0001995	[REDACTED]
149	SPE_BL0000367	[REDACTED]
150	HEATH_000034685	[REDACTED]