

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

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

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

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

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

**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

WILLKIE FARR & GALLAGHER LLP

Michael J. Gottlieb

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# **Attachment A**

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

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

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]

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