

quinn emanuel trial lawyers | los angeles

865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | tel (213) 4433000 fax (213) 4433100

December 5, 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*, 1:24-cv-10049-LJL

Pursuant to the Court’s November 26, 2025 order (ECF No. 1027), Jonesworks LLC is refiled redacted versions of Exhibits 14 and 25 in support of its Motion for Spoliation Sanctions with PII redacted. In addition to PII, Jonesworks has redacted the names of third parties in Exhibit 14 (ECF No. 871-12) consistent with the Court’s statements in its order. *See* ECF No. 1027 at 3 (noting the “significant and substantial privacy interests, such as the physical safety of ... third parties”) (quoting *Courthouse News Serv. v. Corsones*, 131 F.4th 59, 69 (2d Cir. 2025)).

Respectfully submitted,

/s/ Kristin Tahler

DATED: December 5, 2025
Los Angeles, California

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Kristin Tahler
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
(213) 443-3000
kristintahler@quinnemanuel.com

Maaren A. Shah
Morgan L. Anastasio
295 5th Avenue
New York, New York 10016
(212) 849-7000
maarenshah@quinnemanuel.com
morgananastasio@quinnemanuel.com

Nicholas Inns (*pro hac vice*)
1300 I Street NW
Suite 900
Washington, D.C. 20005
(202) 538-8000
nicholasinns@quinnemanuel.com

*Attorneys for Third-Party Defendant
Jonesworks, LLC*