

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,	:
	:
Plaintiff,	:
	:
v.	:
	:
WAYFARER STUDIOS LLC, JUSTIN BALDONI,	:
JAMEY HEATH, STEVE SAROWITZ, IT ENDS	:
WITH US MOVIE LLC, MELISSA NATHAN, THE	:
AGENCY GROUP PR LLC, JENNIFER ABEL, JED	:
WALLACE, and STREET RELATIONS INC.,	:
	:
Defendants.	:
	x
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JENNIFER ABEL,	:
	:
Third-Party Plaintiff,	:
	:
v.	:
	:
JONESWORKS LLC,	:
	:
Third-Party Defendant.	:
_____	:

**DECLARATION OF THERESA M TROUPSON IN SUPPORT OF THE
WAYFARER PARTIES’ OPPOSITION TO PLAINTIFF BLAKE LIVELY’S
MOTION TO COMPEL PRIVILEGE LOG**

I, Theresa M Troupson, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm Liner Freedman Taitelman + Cooley, LLP, attorneys of record for Wayfarer Studios LLC (“Wayfarer”), Justin Baldoni (“Baldoni”) Jamey Heath (“Heath”), Steve Sarowitz (“Sarowitz”), It Ends With Us Movie LLC (“IEWUM”), Melissa Nathan (“Nathan”), The Agency Group PR LLC (“TAG”), and Jennifer Abel (“Abel”) (collectively, the “Wayfarer Parties”).

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff Blake Lively's ("Lively") Supplemental Privilege Log served on all parties on or about August 6, 2025.

3. After receiving Lively's motion to compel on December 1, 2025 (ECF No. 1032), I re-reviewed the 106 entries Lively identified as well as the underlying documents.

4. I considered Lively's new arguments (there had been no meet and confer between the service of the Wayfarer Parties' last log on November 25, 2025 and the filing of Lively's motion to compel on December 1, 2025) in performing my re-review. I determined that additional details could be provided without revealing the substance of the privileged communications and revised the privilege log entries Lively identified to include the additional information. Attached hereto as Exhibit B is a true and correct copy of the Wayfarer Parties' log revised as of December 5, 2025. The 106 entries are highlighted with grey shading on the revised log.

5. During my re-review, I identified some documents that should be produced and others that could be produced in a redacted form. I will produce those documents by December 8, 2025. I indicated on the revised log the entries that will be produced and state whether the document will be produced in full or in a redacted form.

6. In addition, I determined that the previous version of the log had inadvertently included some documents that were not privileged themselves but had been attached to a privileged communication – and therefore, should be produced. Some of those documents had already been produced, while others had not been. If the document had previously been produced, I note on the log where that is the case and provide the Bates number of the document. If the document was mistakenly not produced, I so indicate on the log and will produce those documents by December 8, 2025.

7. I also matched the attachments with the parent documents and discovered that the last version of the privilege log had inadvertently omitted some privileged documents. I highlighted those new entries in grey on the revised log and noted in bold that they had been inadvertently left off the prior version of the log.

8. Finally, I also identified some errors in the descriptions for the 106 entries and corrected them.

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

Dated: December 5, 2025
Los Angeles, CA

By: /s/ Theresa M Troupson
LINER FREEDMAN TAITELMAN + COOLEY, LLP
Bryan J. Freedman*
Ellyn S. Garofalo*
Theresa M Troupson*
1801 Century Park West, 5th Floor
Los Angeles, CA 90067
Tel: (310) 201-0005
Email: bfreedman@lftcllp.com
egarofalo@lftcllp.com
ttroupson@lftcllp.com

*Admitted *Pro Hac Vice*

EXHIBIT A

PLAINTIFF'S SUPPLEMENTAL PRIVILEGE LOG
 BLAKE LIVELY, Plaintiff, v.
 WAYFARER STUDIOS LLC, et al., Defendants.

Log #	Date	Privilege Basis	Author	From	To	CC	BCC	Message Participants	Description
BL-PRIV-SUPP_001	2023-05-03	Attorney client privilege						Lively, Blake;Stone, Justin	Message discussing legal advice of Sloane Offer Weber and Dern LLP concerning on-set conduct.
BL-PRIV-SUPP_002	2023-11-08	Attorney client privilege; Attorney work product						Lively, Blake;Lively, Blake <b.deadly@mac.com>;Weber, David^	Message requesting legal advice of Sloane Offer Weber and Dern LLP concerning on-set conduct.
BL-PRIV-SUPP_002-1	2023-11-08	Attorney client privilege; Attorney work product							Message attachment providing information necessary to render legal advice of Sloane Offer Weber and Dern LLP concerning on-set conduct.
BL-PRIV-SUPP_003	2024-01-04	Attorney client privilege; Attorney work product						Lively, Blake;Lively, Blake <b.deadly@mac.com>;Lively, Blake <b.deadly@me.com>	Message forwarding legal advice of Sloane Offer Weber and Dern LLP concerning on-set conduct.
BL-PRIV-SUPP_003-1	2024-01-04	Attorney client privilege; Attorney work product							Message attachment reflecting legal advice of Sloane Offer Weber and Dern LLP concerning on-set conduct.
BL-PRIV-SUPP_004	2024-05-01	Attorney client privilege; Attorney work product						Lively, Blake;Lively, Blake <b.deadly@mac.com>;Stone, Justin;Strasberg, Lindsey^;Weber, David^;Zavala, Warren	Message providing legal advice of Sloane Offer Weber and Dern LLP concerning on-set conduct.
BL-PRIV-SUPP_005	2024-05-01	Attorney client privilege; Attorney work product						Lively, Blake;Stone, Justin	Message discussing legal advice of Sloane Offer Weber and Dern LLP concerning post-production.
BL-PRIV-SUPP_006	2024-10-01	Physician-patient privilege						Lively, Blake;Lively, Blake <b.deadly@icloud.com>;Marrone, Dr. Lee	Message reflecting medical advice concerning damages/harm.
BL-PRIV-SUPP_007	2024-12-19	Attorney client privilege						Lively, Blake;Roeser, Stephanie^;Strasberg, Lindsey^	Message providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-1	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-2	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-3	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-4	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-5	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-6	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-7	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-8	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-9	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-10	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-11	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-12	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-13	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-14	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-15	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-16	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-17	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.
BL-PRIV-SUPP_007-18	2024-12-19	Attorney client privilege							Message attachment providing information necessary to render legal advice of Manatt Phelps & Phillips, LLP concerning litigation.

EXHIBIT B

Revised (as of 12/5/2025) Supplemental Privilege Log of the Wayfarer Parties (Signal Messages Dec. 20, 2024-Feb. 18, 2025)

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
1	12/20/2024 7:57 PM	Melissa Nathan	Bryan Freedman; Jed Wallace; Melissa Nathan	Communication in furtherance of legal advice regarding the nature and evaluation of potential claims against Melissa Nathan and Jed Wallace.	Attorney-Client Communication; Work Product; Common Interest
2	12/21/2024 12:08 AM	Jed Wallace; Melissa Nathan	Bryan Freedman; Jed Wallace; Melissa Nathan	Communication in furtherance of legal advice regarding possible claims against Stephanie Jones and the nature and evaluation of claims against Melissa Nathan and Jed Wallace, as well as evaluation of potential claims against the New York Times.	Attorney-Client Communication; Work Product; Common Interest
3	12/21/2024 12:08 AM	Melissa Nathan; Jed Wallace; Bryan Freedman	Melissa Nathan; Jed Wallace; Bryan Freedman	Voice note attachment to attorney-client communication seeking and providing legal advice concerning the nature, contents, and implications of communications obtained by the New York Times from Blake Lively and Stephanie Jones, and evaluation of potential claims in response thereto.	Attorney-Client Communication; Work Product; Common Interest
4	12/21/2024 6:55 PM	Jennifer Abel; Bryan Freedman; Melissa Nathan	Jennifer Abel; Bryan Freedman; Melissa Nathan	Communication seeking and providing legal advice concerning the status, strategy, and implications of claims by Jonesworks and Stephanie Jones, and formulating legal response thereto.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
5	12/21/2024 7:11 PM	Jennifer Abel; Bryan Freedman	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Communication prepared in anticipation of litigation and in furtherance of legal advice regarding the collection and organization of evidence for use in evaluating and formulating claims against Jonesworks and Stephanie Jones.	Attorney-Client Communication; Work Product; Common Interest
6	12/22/2024 1:58 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Communication seeking and providing legal advice concerning the nature, scope, and implications of allegations and claims asserted by Blake Lively and Stephanie Jones and evaluating evidence in support of potential claims against same.	Attorney-Client Communication Work Product
7	12/22/2024 6:50 AM	Jed Wallace; Melissa Nathan	Bryan Freedman; Jed Wallace; Melissa Nathan	Communication seeking legal advice concerning the status, strategy, and implications of litigation involving Jonesworks and Stephanie Jones and seeking legal advice regarding potential assertion of claims against the New York Times, Stephanie Jones, and Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
8	12/22/2024 7:28 AM	Jennifer Abel; Melissa Nathan	Jennifer Abel; Bryan Freedman; Melissa Nathan	Communication seeking legal advice concerning the status, strategy, and implications of litigation involving Jonesworks and Stephanie Jones.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
9	12/22/2024 11:47 AM	Jennifer Abel; Justin Baldoni; Bryan Freedman; Jamey Heath; Melissa Nathan; Jed Wallace	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Communication seeking and providing legal advice regarding drafting countersuit in response to Blake Lively's claims and the gathering of evidence in support thereof.	Attorney-Client Communication; Work Product; Common Interest
10	12/22/2024 11:47 AM	Justin Baldoni	Bryan Freedman; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Kevin Fritz, Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Jennifer Abel; Melissa Nathan	This is an attachment to entry 9. Justin Baldoni sends a video he made on December 22, 2024 to Liner Freedman. The video depicts Baldoni scrolling through his iPad as he points to particular text messages exchanged during production of the Film and he describes those communications.to counsel This video was prepared in response to Liner Freedman's inquiries regarding information and evidence related to Blake Lively's claims and in support of drafting the countersuit.	Attorney-Client Communication; Work Product; Common Interest
11	12/22/2024 11:47 AM	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	This is an attachment to entry 9. It is a voice note from Jed Wallace responding to an inquiry from Bryan Freedman regarding forensically obtaining particular electronically stored communications for purposes of the lawsuit.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
12	12/22/2024 1:58 PM	Jamey Heath; Jennifer Abel; Bryan Freedman; Jed Wallace; Melissa Nathan; Justin Baldoni	Steve Sarowitz; Ahmed Musiol; Jamey Heath; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Spencer Freedman	Communication seeking and providing legal advice regarding drafting countersuit in response to Blake Lively's claims and the gathering of evidence in support thereof.	Attorney-Client Communication; Work Product; Common Interest
13	12/22/2024 1:58 PM	Justin Baldoni	Bryan Freedman; Mitra Ahouraian; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Mitz Toskovic; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jamey Heath; Jennifer Abel; Melissa Nathan; Jed Wallace;	This is an attachment to entry 12. This document is identical to log entry 10. It was resent.	Attorney-Client Communication; Work Product; Common Interest
14	12/22/2024 1:58 PM	Jed Wallace	Bryan Freedman; Justin Baldoni; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jamey Heath; Jennifer Abel; Melissa Nathan;	This is an attachment to entry 12. This voice note is identical to log entry 11.	Attorney-Client Communication; Work Product; Common Interest
15	12/22/2024 7:04 PM	Summer Benson; Melissa Nathan	Summer Benson; Melissa Nathan	Communication seeking legal advice regarding legal response and countersuit to Blake Lively's claims and the gathering of evidence related thereto.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
16	12/22/2024 9:53 PM	Alyx Sealy; Melissa Nathan	Alyx Sealy; Summer Benson; Melissa Nathan	Communication conveying information necessary to seeking legal advice regarding allegations and claims brought by Blake Lively against The Agency Group PR LLC and Melissa Nathan, and evaluation of evidence gathered in support of drafting countersuit and/or legal response to claims brought by Lively.	Attorney-Client Communication; Work Product; Common Interest
17	12/22/2024 11:05 PM	Jennifer Abel; Bryan Freedman; Miles Cooley; Summer Benson; Melissa Nathan	Spencer Freedman; Jennifer Abel; Bryan Freedman; Jared Freedman; Miles Cooley; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Carolina Hurley; Melissa Nathan; Jason Sunshine; Katie Case	Communication seeking and providing legal advice regarding allegations and claims brought by Stephanie Jones, enforceability of Abel employment contract, and formulating legal response to claims by Jones and Jonesworks.	Attorney-Client Communication; Work Product; Common Interest
18	12/23/2024 12:37 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Communication seeking and providing legal advice regarding allegations and claims brought by Blake Lively and Jonesworks against The Agency Group PR LLC and Melissa Nathan and seeking and providing legal advice re potential countersuits against same.	Attorney-Client Communication; Work Product
19	12/23/2024 9:39 AM	Bryan Freedman; Jennifer Abel	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Communication seeking and providing legal advice regarding potential legal response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks, and countersuits against same.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
20	12/23/2024 1:28 PM	Justin Baldoni; Bryan Freedman; Jennifer Abel	Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Summer Benson; Melissa Nathan	Communication seeking and providing legal advice regarding potential legal response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks, and countersuits against same.	Attorney-Client Communication; Work Product; Common Interest
21				This document will be produced by December 8, 2025.	
22	12/23/2024 4:03 PM	Summer Benson; Melissa Nathan	Summer Benson; Melissa Nathan	Communication providing information to attorney to enable provision of informed legal advice regarding response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks and potential countersuits.	Attorney-Client Communication; Work Product
23	12/23/2024 4:18 PM	Summer Benson; Melissa Nathan	Jennifer Abel; Summer Benson; Melissa Nathan	Communication providing information to attorney to enable provision of informed legal advice regarding response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks and potential countersuits.	Attorney-Client Communication; Work Product; Common Interest
24	12/23/2024 6:05 PM	Summer Benson; Melissa Nathan	Bryan Freedman; Summer Benson; Melissa Nathan	Communication providing information to attorney to enable provision of informed legal advice regarding response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks and potential countersuits.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
25	12/23/2024 6:06 PM	Melissa Nathan	Jamey Heath	Communication regarding significance of documents requested by Bryan Freedman and Summer Benson relating to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks and potential countersuits.	Attorney-Client Communication; Work Product; Common Interest
26	12/24/2024 12:06 AM	Summer Benson; Melissa Nathan	Summer Benson; Melissa Nathan	Communication providing information to attorney to enable provision of informed legal advice regarding response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks and potential countersuits.	Attorney-Client Communication; Work Product
27	12/24/2024 12:25 AM	Justin Baldoni; Bryan Freedman; Mitra Ahouraian; Jamey Heath; Melissa Nathan; Jed Wallace; Jennifer Abel	Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Summer Benson; Melissa Nathan	Communication in furtherance of legal advice regarding conducting discovery in response to Blake Lively's allegations in the CRD Complaint and the internal investigation thereof.	Attorney-Client Communication; Work Product; Common Interest
28	12/24/2024 12:25 AM	Jed Wallace	Justin Baldoni; Mitz Toskovic; Summer Benson; Melissa Nathan; Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian	Voice note attachment to attorney-client communication providing information to attorneys to enable provision of legal advice regarding legal response and countersuit to allegations in the CRD Complaint and the internal investigation thereof.	Attorney-Client Communication; Work Product; Common Interest
29	12/24/2024 12:25 AM	Jed Wallace	Justin Baldoni; Mitz Toskovic; Summer Benson; Melissa Nathan; Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian	Voice note attachment to attorney-client communication providing information to attorneys to enable provision of legal advice regarding legal response and countersuit to allegations in the CRD Complaint and the internal investigation thereof.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
30	12/24/2024 12:25 AM	Jed Wallace	Justin Baldoni; Mitz Toskovic; Summer Benson; Melissa Nathan; Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian	Voice note attachment to attorney-client communication providing information to attorneys to enable provision of legal advice regarding legal response and countersuit to allegations in the CRD Complaint and the internal investigation thereof.	Attorney-Client Communication; Work Product; Common Interest
31	12/24/2024 12:52 AM	Jennifer Abel; Melissa Nathan	Jennifer Abel; Bryan Freedman; Melissa Nathan	Communication providing information to attorney to enable provision of informed legal advice regarding legal response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks and potential countersuits.	Attorney-Client Communication; Work Product; Common Interest
32	12/24/2024 8:24 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Communication seeking and providing legal advice regarding legal response to claims brought by Stephanie Jones and Jonesworks against Melissa Nathan and The Agency Group PR LLC.	Attorney-Client Communication; Work Product
33	12/24/2024 8:35 AM	Jennifer Abel; Melissa Nathan	Jennifer Abel; Bryan Freedman; Summer Benson; Melissa Nathan	Communication providing information to attorneys to enable provision of informed legal advice regarding legal response to allegations and claims brought by Blake Lively and Stephanie Jones/Jonesworks and potential countersuits.	Attorney-Client Communication; Work Product; Common Interest
34	12/24/2024 8:56 AM	Melissa Nathan; Jennifer Abel	Jennifer Abel; Melissa Nathan	Communication regarding obtaining legal advice pertaining to the terms of engagement of litigation counsel in the Blake Lively and Stephanie Jones/Jonesworks lawsuits.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
35	12/25/2024 12:00 AM	Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Justin Baldoni	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Communication seeking and providing legal advice regarding the independent investigation conducted in response to claims by Blake Lively and legal strategy for legal response to claims brought by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
36	12/25/2024 12:00 AM	Justin Baldoni	Melissa Nathan; Jennifer Abel; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Voice note attachment to attorney-client communication seeking legal advice regarding the independent investigation conducted in response to claims by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
37	12/25/2024 12:00 AM	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Melissa Nathan; Jennifer Abel	This is an attachment to entry 35. It is a voice note from Jed Wallace responding to Bryan Freedman's legal advice relating to independent investigation and also comments on Mr. Freedman's analysis and opinions regarding Lively's claims.	Attorney-Client Communication; Work Product; Common Interest
38	12/25/2024 12:19 AM	Melissa Nathan; Jennifer Abel	Jennifer Abel; Bryan Freedman; Summer Benson; Melissa Nathan	Communication seeking legal advice regarding allegations made by Blake Lively in her lawsuit and internal investigation thereof.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
39	12/25/2024 12:23 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Communication providing information to attorney to enable provision of informed legal advice regarding allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits.	Attorney-Client Communication; Work Product
40	12/25/2024 9:27 AM	Melissa Nathan	Summer Benson; Melissa Nathan	Communication providing information to attorney to enable provision of legal advice regarding legal response to allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits and potential countersuits.	Attorney-Client Communication; Work Product
41	12/26/2024 2:32 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Communication seeking information from client to enable provision of informed legal advice regarding the preparation of a legal response to the Blake Lively and Stephanie Jones/Jonesworks lawsuits and countersuits thereto.	Attorney-Client Communication; Work Product
42				This document was previously produced at WAYFARER 000166985.	
43	12/26/2024 4:11 AM	Bryan Freedman; Jennifer Abel; Melissa Nathan	Jennifer Abel; Bryan Freedman; Summer Benson; Melissa Nathan	Communication seeking information from client to enable provision of informed legal advice regarding the preparation of a legal response to the Blake Lively and Stephanie Jones/Jonesworks lawsuits and countersuits thereto.	Attorney-Client Communication; Work Product; Common Interest
44				This document was previously produced at WAYFARER 000166985.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
45	12/26/2024 4:11 AM	Bryan Freedman; Jennifer Abel; Miles Cooley; Summer Benson; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Melissa Nathan	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Communication seeking information from clients to enable provision of informed legal advice regarding the preparation of a legal response to the Blake Lively and Stephanie Jones/Jonesworks lawsuits and countersuits thereto and providing legal advice regarding same.	Attorney-Client Communication; Work Product; Common Interest
46				This document was previously produced at WAYFARER 000166985.	
47	12/26/2024 10:09 AM	Jamey Heath	Mitz Toskovic	Communication regarding significance of documents and information requested by Liner Freedman for purposes of preparation of a legal response to the Blake Lively and Stephanie Jones/Jonesworks lawsuits and countersuits.	Attorney-Client Communication; Work Product; Common Interest
48	12/26/2024 1:06 PM	Justin Baldoni; Mitra Ahouraian	Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Summer Benson; Melissa Nathan	Communication providing legal advice regarding potential lawsuit based on the CRD Complaint filed by Blake Lively and discovery in connection therewith.	Attorney-Client Communication; Work Product; Common Interest
49	12/26/2024 9:35 PM	Melissa Nathan; Michael Lawrence	Melissa Nathan; Michael Lawrence	Communication intended to provide information to attorneys to enable provision of informed legal advice regarding the preparation of a legal response to the Blake Lively and Stephanie Jones/Jonesworks lawsuits and countersuits in response thereto.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
50	12/27/2024 12:34 AM	Mitra Ahouraian; Jennifer Abel; Breanna Butler Koslow; Spencer Freedman; Melissa Nathan; Jed Wallace	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Communication providing information to attorneys to enable provision of informed legal advice regarding the preparation of a legal response to the Blake Lively and Stephanie Jones/Jonesworks lawsuits and countersuits in response thereto.	Attorney-Client Communication; Work Product; Common Interest
51	12/27/2024 6:05 AM	Justin Baldoni; Jennifer Abel; Melissa Nathan; Jamey Heath	Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Summer Benson; Melissa Nathan	Communication providing information to attorneys to enable provision of legal advice regarding the legal response to lawsuits filed by Blake Lively and Stephanie Jones/Jonesworks and countersuits in response.	Attorney-Client Communication; Work Product; Common Interest
52				This document was previously produced at ABEL_000022226; BALDONI_000021300; BALDONI_000021481; HEATH_0000051732; and JONESWORKS_00039733.	
53				This document was previously produced at ABEL_000022226; BALDONI_000021300; BALDONI_000021481; HEATH_0000051732; and JONESWORKS_00039733.	
54	12/27/2024 10:01 AM	Melissa Nathan; Michael Lawrence	Melissa Nathan; Michael Lawrence	Communication intended to provide information to attorneys to enable provision of legal advice regarding the legal response to lawsuits filed by Blake Lively and Stephanie Jones/Jonesworks and countersuits in response thereto.	Attorney-Client Communication; Work Product; Common Interest
55	12/27/2024 12:24 PM	Jennifer Abel; Bryan Freedman; Summer Benson; Melissa Nathan	Jennifer Abel; Bryan Freedman; Summer Benson; Melissa Nathan	Communication seeking legal advice regarding the preparation of a lawsuit against the New York Times.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
56	12/27/2024 4:49 PM	Justin Baldoni	Jamey Heath	Communication containing information requested by Liner Freedman to enable provision of legal advice regarding the preparation of a lawsuit against the New York Times and potential suit against Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
57	12/27/2024 4:49 PM	Justin Baldoni	Jamey Heath	Attachment to entry 56. This is a Word document containing information requested by Liner Freedman to enable the provision of legal advice regarding preparation of a lawsuit against the New York Times and potential suit against Blake Lively. The information in the attachment largely duplicates the information in entry 56.	Attorney-Client Communication; Work Product; Common Interest
58	12/27/2024 5:42 PM	Mitra Ahouraian; Jamey Heath	Jamey Heath; Mitra Ahouraian; Justin Baldoni	Communication regarding terms of engagement of Law Offices of Mitra S. Ahouraian, Esq. for purposes of seeking and obtaining legal advice regarding claims brought by Blake Lively, Stephanie Jones, and Jonesworks.	Attorney-Client Communication; Work Product; Common Interest
59	12/27/2024 5:42 PM	Mitra Ahouraian	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attachment to attorney-client communication regarding the terms of engagement of the Law Offices of Mitra S. Ahouraian, Esq., reflecting the engagement agreement.	Attorney-Client Communication; Work Product; Common Interest
60	12/27/2024 5:42 PM	Jamey Heath	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attachment to attorney-client communication regarding the terms of engagement of the Law Offices of Mitra S. Ahouraian, Esq., reflecting the engagement agreement.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
61	12/27/2024 5:42 PM	Mitra Ahouraian	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attachment to attorney-client communication regarding the terms of engagement of the Law Offices of Mitra S. Ahouraian, Esq., reflecting the engagement agreement.	Attorney-Client Communication; Work Product; Common Interest
62	12/27/2024 5:42 PM	Jamey Heath	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attachment to attorney-client communication regarding the terms of engagement of the Law Offices of Mitra S. Ahouraian, Esq., reflecting the engagement agreement.	Attorney-Client Communication; Work Product; Common Interest
63	12/27/2024 7:39 PM	Jamey Heath; Mitz Toskovic	Jamey Heath; Mitz Toskovic	Communication of legal advice regarding the internal investigation and information requested by Liner Freedman for purposes of preparing defenses to Lively's suit. This communication also contains a draft of a proposed public statement written by Mitz Toskovic and proposed to be made by Justin Baldoni, which was subsequently forwarded to attorney Summer Benson for legal advice regarding the contents of the statement. The statement was never issued by Mr. Baldoni.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
64	12/27/2024 7:39 PM	Mitz Toskovic	Jamey Heath	Attachment to entry 64. This is a text document containing the same draft proposed public statement written by Mitz Toskovic and proposed to be made by Justin Baldoni, which was subsequently forwarded to attorney Summer Benson for legal advice regarding the contents of the statement. The statement was never issued by Mr. Baldoni.	Attorney-Client Communication; Work Product; Common Interest
65	12/27/2024 7:39 PM	Mitz Toskovic	Jamey Heath	Attachment to entry 64. This is a text document containing the same draft proposed public statement written by Mitz Toskovic and proposed to be made by Justin Baldoni, which was subsequently forwarded to attorney Summer Benson for legal advice regarding the contents of the statement. The statement was never issued by Mr. Baldoni.	Attorney-Client Communication; Work Product; Common Interest
66	12/28/2024 1:58 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Communication in seeking and providing legal advice regarding the legal response to allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits.	Attorney-Client Communication; Work Product
67	12/28/2024 3:01 AM	Spencer Freedman; Melissa Nathan; Jennifer Abel; Bryan Freedman; Breanna Butler Koslow; Miles Cooley; Jed Wallace	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Communication in furtherance of legal advice regarding the preparation of a legal response to Blake Lively and Stephanie Jones/Jonesworks lawsuits.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
68	12/28/2024 3:01 AM	Spencer Freedman	Jennifer Abel; Melissa Nathan; Bryan Freedman; Summer Benson; Miles Cooley; Carolina Hurley; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Spencer Freedman; Jason Sunshine; Jared Freedman; Katie Case	Attachment to entry 67. Document prepared at the request and direction of Bryan Freedman assembling evidence into various categories of legal theories to assist with his legal analysis of Lively's claims. The document reflects Mr. Freedman's opinion work product and the clients' communications of information to assist in Mr. Freedman's strategy in the Lively lawsuit and Jones/Jonesworks lawsuit.	Attorney-Client Communication; Work Product; Common Interest
69	12/28/2024 3:01 AM	Melissa Nathan	Jennifer Abel; Melissa Nathan; Bryan Freedman; Summer Benson; Miles Cooley; Carolina Hurley; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Spencer Freedman; Jason Sunshine; Jared Freedman; Katie Case	Attachment to entry 67. This is a document containing additional information for inclusion into Mr. Freedman's opinion work product document referenced in entry 68.	Attorney-Client Communication; Work Product; Common Interest
70	12/28/2024 3:01 AM	Bryan Freedman	Jennifer Abel; Melissa Nathan; Bryan Freedman; Summer Benson; Miles Cooley; Carolina Hurley; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Spencer Freedman; Jason Sunshine; Jared Freedman; Katie Case	Attachment to entry 67. This is another document containing additional information for inclusion into Mr. Freedman's opinion work product document referenced in entry 68.	Attorney-Client Communication; Work Product; Common Interest
71	12/28/2024 3:01 AM	Breanna Butler Koslow	Jennifer Abel; Melissa Nathan; Bryan Freedman; Summer Benson; Miles Cooley; Carolina Hurley; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Spencer Freedman; Jason Sunshine; Jared Freedman; Katie Case	Attachment to entry 67. This is another document containing additional information for inclusion into Mr. Freedman's opinion work product document referenced in entry 68.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
72	12/28/2024 3:01 AM	Jed Wallace	Bryan Freedman; Summer Benson; Miles Cooley; Carolina Hurley; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Spencer Freedman; Jason Sunshine; Jared Freedman; Katie Case; Jennifer Abel; Melissa Nathan	Attachment to entry 67. This is a voice note from Jed Wallace commenting on Mr. Freedman's discussion of legal strategy and advice contained in entry 67.	Attorney-Client Communication; Work Product; Common Interest
73	12/28/2024 7:17 AM	Justin Baldoni	Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Summer Benson; Melissa Nathan	Communication providing information to attorney necessary to enable provision of informed legal advice regarding evidence to rebut certain allegations made by Blake Lively in her lawsuit in support of drafting countersuit.	Attorney-Client Communication; Work Product; Common Interest
74	12/28/2024 12:28 PM	Spencer Freedman; Melissa Nathan; Jennifer Abel	Spencer Freedman; Jennifer Abel; Melissa Nathan	Communication providing information to attorney necessary to enable provision of informed legal advice regarding evidence to be used in drafting countersuit.	Attorney-Client Communication; Work Product; Common Interest
75	12/28/2024 12:28 PM	Spencer Freedman; Melissa Nathan; Jennifer Abel	Melissa Nathan; Spencer Freedman; Jennifer Abel	Attachment to entry 74. This document provides information requested by Liner Freedman for the purpose of providing informed legal advice regarding evidence to be used in drafting countersuit and reflects attorney opinion work product.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
76	12/28/2024 3:39 PM	Jared Freedman; Spencer Freedman; Breanna Butler Koslow; Melissa Nathan; Jared Freedman	Spencer Freedman; Breanna Butler Koslow; Melissa Nathan; Jared Freedman	Communication reflecting work product related to legal advice regarding legal implications of public relations and media strategy in furtherance of legal advice and litigation objectives concerning the lawsuit against The New York Times. This communication contains drafts of a proposed statement written by Mr. Freedman for public issuance on behalf of the Wayfarer Parties, including comments and revisions by Mr. Freedman, Melissa Nathan, Jared Freedman, Spencer Freedman, and Breanna Butler Koslow. The drafts were never used and the statement was never issued. This communication reflects Mr. Freedman's advice and opinion work product about the advisability of issuing the statement.	Attorney-Client Communication; Work Product; Common Interest
77	12/28/2024 9:49 PM	Mitra Ahouraian; Mitz Toskovic	Jamey Heath; Mitz Toskovic; Mitra Ahouraian; Justin Baldoni	Communication seeking and providing information to attorney necessary to facilitate the provision of informed legal advice regarding drafting legal response and countersuit in response to allegations made by Blake Lively in her lawsuit.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
78	12/28/2024 11:16 PM	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication seeking and providing information to be communicated to attorney to facilitate the provision of informed legal advice regarding legal response and countersuit in response to allegations made by Blake Lively in her lawsuit.	Attorney-Client Communication; Work Product
79	12/29/2024 12:01 AM	Jennifer Abel; Spencer Freedman; Melissa Nathan	Spencer Freedman; Jennifer Abel; Melissa Nathan	Communication seeking and providing information to be communicated to attorney to facilitate the provision of legal advice regarding drafting suit against New York Times in response to allegations made by Blake Lively in her lawsuit and publicized by the Times.	Attorney-Client Communication; Work Product; Common Interest
80	12/29/2024 12:01 AM	Spencer Freedman	Jennifer Abel; Melissa Nathan; Spencer Freedman	Attachment to entry 79. Document prepared at the request and direction of Bryan Freedman assembling evidence into various categories of legal theories to assist with his legal analysis of Lively's claims. The document reflects Mr. Freedman's opinion work product and the clients' communications of information to assist in Mr. Freedman's strategy in the Lively lawsuit and Jones/Jonesworks lawsuit.	Attorney-Client Communication; Work Product; Common Interest
81				This document was previously produced at NATHAN_000024968, NATHAN_000027529, and TAG_000022103.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
82				This document was previously produced at NATHAN_000024969, NATHAN_000027530, and TAG_000022104.	
83	12/29/2024 12:02 AM	Jennifer Abel	Jennifer Abel; Mitra Ahouraian; Summer Benson	Communication seeking legal advice regarding drafting complaint against New York Times in response to allegations made by Blake Lively in her lawsuit and publicized by the Times.	Attorney-Client Communication; Work Product; Common Interest
84	12/29/2024 2:52 AM	Jamey Heath; Spencer Freedman; Bryan Freedman; Justin Baldoni	Jamey Heath; Spencer Freedman; Bryan Freedman; Michael Garlie; Justin Baldoni; Erik Rasmussen	Communication providing legal advice and direction regarding collection of evidence to rebut allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits and to draft suit against New York Times.	Attorney-Client Communication; Work Product; Common Interest
85	12/29/2024 2:52 AM	Erik Rasmussen	Bryan Freedman; Spencer Freedman; Erik Rasmussen; Jamey Heath; Justin Baldoni; Michael Garlie	Attachment to communication conveying attorney's legal advice and direction regarding collection of evidence to rebut allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits and to draft suit against New York Times and including such advice and direction therein.	Attorney-Client Communication; Work Product; Common Interest
86	12/29/2024 2:52 AM	Justin Baldoni	Bryan Freedman; Spencer Freedman; Erik Rasmussen; Jamey Heath; Justin Baldoni; Michael Garlie	Attachment to communication providing legal advice and direction regarding collection of evidence to rebut allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits and to draft suit against New York Times and including such advice and direction therein.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
87	12/29/2024 2:52 AM	Justin Baldoni	Bryan Freedman; Spencer Freedman; Erik Rasmussen; Jamey Heath; Justin Baldoni; Michael Garlie	Attachment to communication providing legal advice and direction regarding collection of evidence to rebut allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits and to draft suit against New York Times and including such advice and direction therein.	Attorney-Client Communication; Work Product; Common Interest
88	12/29/2024 2:59 AM	Spencer Freedman; Katie Case; Jennifer Abel; Breanna Butler Koslow; Melissa Nathan	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Communication seeking and providing information to attorney to facilitate provision of informed legal advice regarding legal response to allegations made by Blake Lively and Stephanie Jones/Jonesworks in their lawsuits and drafting complaint against the New York Times.	Attorney-Client Communication; Work Product; Common Interest
89	12/29/2024 3:08	Mitra Ahouraian; Justin Baldoni	Jamey Heath; Mitra Ahouraian; Justin Baldoni	Attorney-client communication providing legal advice regarding potential outcomes of litigation for opposing party.	Attorney-Client Communication; Work Product; Common Interest
90	12/29/2024 3:08	Justin Baldoni	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attorney-client communication attachment conveying information necessary to provide informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
91	12/29/2024 5:34	Justin Baldoni; Jennifer Abel; Jamey Heath; Mitz Toskovic; Mitra Ahouraian; Bryan Freedman; Melissa Nathan; Jed Wallace	Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Summer Benson; Melissa Nathan	Attorney-client communication requesting and conveying information necessary to provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
92	12/29/2024 5:34	Jed Wallace	Justin Baldoni; Mitz Toskovic; Summer Benson; Melissa Nathan; Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian	Attorney-client communication attachment conveying information necessary to provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
93	12/29/2024 10:45	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Attorney-client communication conveying and seeking information necessary to provide to attorney to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product
94	12/29/2024 10:45	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	This is an attachment to entry 93. It is a document prepared at the request and direction of Bryan Freedman assembling evidence into various categories of legal theories to assist with his legal analysis of Lively's claims. The document reflects Mr. Freedman's opinion work product and the clients' communications of information to assist in Mr. Freedman's strategy in the Lively lawsuit and Jones/Jonesworks lawsuit.	Attorney-Client Communication; Work Product
95	12/29/2024 11:36	Jamey Heath; Mitz Toskovic	Jamey Heath; Mitz Toskovic	Communication between company executives regarding locating and conveying information to attorney to enable provision of informed legal services re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
96	12/29/2024 11:36	Jamey Heath; Mitz Toskovic	Mitz Toskovic; Jamey Heath	Attachment to entry 95. Document provides information requested by Liner Freedman for the purpose of analyzing specific allegations made in Lively's complaint and for preparing defense.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
97	12/29/2024 12:47	Melissa Nathan; Jennifer Abel; Michael Lawrence; Breanna Butler Koslow	Jennifer Abel; Breanna Butler Koslow; Melissa Nathan; Michael Lawrence	Communication regarding locating and conveying information to attorney to enable provision of informed legal services re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
98	12/29/2024 15:14	Mitz Toskovic; Jennifer Abel	Mitz Toskovic; Jennifer Abel	Communication necessary to convey information to attorney to facilitate provision of informed legal advice regarding preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
99	12/30/2024 2:16	Justin Baldoni; Erik Rasmussen; Spencer Freedman; Michael Garlie	Jamey Heath; Spencer Freedman; Bryan Freedman; Michael Garlie; Justin Baldoni; Erik Rasmussen	Communication between attorney, client, and attorney's agent re collection and preservation of evidence in response to legal action filed by Lively.	Attorney-Client Communication; Work Product; Common Interest
100	12/30/2024 3:33	Justin Baldoni; Jamey Heath; Mitz Toskovic; Mitra Ahouraian; Jennifer Abel; Bryan Freedman; Melissa Nathan	Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Summer Benson; Melissa Nathan	Attorney-client communication conveying information necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
101	12/30/2024 16:36	Jennifer Abel; Summer Benson; Melissa Nathan	Jennifer Abel; Summer Benson; Melissa Nathan	Attorney-client communication conveying information necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
102	12/30/2024 19:40	Melissa Nathan	Summer Benson; Melissa Nathan	Attorney-client communication conveying information necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product
103	12/30/2024 19:40	Summer Benson; Melissa Nathan	Summer Benson; Melissa Nathan	Attorney-client communication attachment conveying information necessary to enable provision of informed legal advice re preparation of draft complaint and reflecting attorney work product.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
104	12/30/2024 23:04	Spencer Freedman; Jennifer Abel	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication seeking and conveying information necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
105	12/31/2024 14:40	Summer Benson; Melissa Nathan	Summer Benson; Melissa Nathan	Attorney-client communication seeking and conveying information necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product
106	12/31/2024 14:40	Summer Benson; Melissa Nathan	Summer Benson; Melissa Nathan	Attorney-client communication attachment conveying information necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product
107	12/31/2024 15:21	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication conveying information intended to be conveyed to attorney and necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product
108	12/31/2024 15:21	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication attachment conveying information intended to be conveyed to attorney and necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product
109	12/31/2024 15:45	Jennifer Abel	Spencer Freedman; Jennifer Abel; Melissa Nathan	Communication conveying information intended to be conveyed to attorney and necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
110	12/31/2024 15:48	Jennifer Abel; Summer Benson	Jennifer Abel; Summer Benson; Melissa Nathan	Attorney-client communication seeking and conveying information necessary to enable provision of informed legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
111	1/1/2025 15:15	Bryan Freedman; Justin Baldoni	Bryan Freedman; Justin Baldoni	Attorney-client communication seeking and conveying information necessary to enable provision of informed legal advice re filing of draft complaint.	Attorney-Client Communication; Work Product
112	1/1/2025 23:51	Spencer Freedman	Spencer Freedman; Jennifer Abel; Melissa Nathan	Communication conveying information from attorney and necessary to communicating legal advice re preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
113	1/2/2025 0:05	Jennifer Abel	Spencer Freedman; Jennifer Abel; Melissa Nathan	Communication conveying information intended to be conveyed to attorney and expressing client view on preparation of draft complaint.	Attorney-Client Communication; Work Product; Common Interest
114	1/2/2025 1:04	Justin Baldoni; Bryan Freedman	Bryan Freedman; Justin Baldoni	Attorney-client communication seeking information necessary to enable provision of informed legal advice and conveying information from attorney necessary to communicate legal advice to client re evidence in support of potential claims against Lively.	Attorney-Client Communication; Work Product
115	1/3/2025 0:58	Bryan Freedman	Bryan Freedman; Justin Baldoni	Attorney-client communication conveying legal advice to client re comparison of CRD complaint and SDNY complaint.	Attorney-Client Communication; Work Product
116	1/3/2025 0:58	Bryan Freedman	Bryan Freedman; Justin Baldoni	Attorney-client communication attachment conveying legal advice to client re comparison of CRD complaint and SDNY complaint.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
117	1/3/2025 0:58	Bryan Freedman	Bryan Freedman; Justin Baldoni	Attorney-client communication attachment conveying legal advice to client re comparison of CRD complaint and SDNY complaint.	Attorney-Client Communication; Work Product
118	1/3/2025 1:03	Bryan Freedman	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication conveying legal advice to client re comparison of CRD complaint and SDNY complaint.	Attorney-Client Communication; Work Product; Common Interest
119	1/3/2025 1:03	Bryan Freedman	Jennifer Abel; Melissa Nathan; Bryan Freedman; Summer Benson; Miles Cooley; Carolina Hurley; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Spencer Freedman; Jason Sunshine; Jared Freedman; Katie Case	Attorney-client communication attachment conveying legal advice to client re comparison of CRD complaint and SDNY complaint.	Attorney-Client Communication; Work Product; Common Interest
120	1/3/2025 1:04	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Attorney-client communication conveying legal advice to client re comparison of CRD complaint and SDNY complaint.	Attorney-Client Communication; Work Product
121	1/3/2025 1:04	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Attorney-client communication attachment conveying legal advice to client re comparison of CRD complaint and SDNY complaint.	Attorney-Client Communication; Work Product
122	1/3/2025 10:32	Bryan Freedman; Melissa Nathan	Summer Benson; Melissa Nathan	Attorney client communication seeking and conveying legal advice re filing of notice of errata to state court complaint against New York Times.	Attorney-Client Communication; Work Product
123	1/5/2025 2:40	Justin Baldoni; Michael Garlie	Justin Baldoni; Michael Garlie	Communication between client and attorney's agent re collection and preservation of evidence in response to legal action filed by Lively.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
124	1/5/2025 6:34	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication conveying information intended to be communicated to attorney and necessary to enable provision of informed legal advice re preparation of complaint.	Attorney-Client Communication; Work Product
125	1/5/2025 6:34	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication conveying information intended to be communicated to attorney and necessary to enable provision of informed legal advice re preparation of complaint.	Attorney-Client Communication; Work Product
126	1/5/2025 6:34	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication conveying information intended to be communicated to attorney and necessary to enable provision of informed legal advice re preparation of complaint.	Attorney-Client Communication; Work Product
127	1/5/2025 6:34	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication conveying information intended to be communicated to attorney and necessary to enable provision of informed legal advice re preparation of complaint.	Attorney-Client Communication; Work Product
128	1/5/2025 6:34	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication conveying information intended to be communicated to attorney and necessary to enable provision of informed legal advice re preparation of complaint.	Attorney-Client Communication; Work Product
129	1/5/2025 6:34	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication conveying information intended to be communicated to attorney and necessary to enable provision of informed legal advice re preparation of complaint.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
130	1/5/2025 9:49	Melissa Nathan; Jennifer Abel; Jed Wallace; Jason Sunshine	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication conveying information necessary to enable provision of informed legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product; Common Interest
131	1/5/2025 13:44	Mitz Toskovic; Bryan Freedman	Jamey Heath; Mitz Toskovic; Bryan Freedman; Summer Benson	Attorney-client communication conveying information necessary to enable provision of informed legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product; Common Interest
132	1/5/2025 19:58	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Attorney-client communication conveying information to client in order to provide legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product
133	1/6/2025 0:29	Justin Baldoni; Michael Garlie	Justin Baldoni; Michael Garlie	Communication between client and attorney's agent re collection and preservation of evidence in response to legal action filed by Lively.	Attorney-Client Communication; Work Product
134	1/6/2025 0:34	Justin Baldoni; Mitz Toskovic; Spencer Freedman; Bryan Freedman; Jed Wallace; Jamey Heath; Theresa Troupson; Mitra Ahouraian; Jennifer Abel	Steve Sarowitz; Ahmed Musiol; Jamey Heath; Mitz Toskovic; Jennifer Abel; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Justin Baldoni; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Jared Freedman; Theresa Troupson; Spencer Freedman; Kevin Fritz	Communication between client and attorney's agent re collection and preservation of evidence in response to legal action filed by Lively.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
135	1/6/2025 0:34	Justin Baldoni	Bryan Freedman; Jennifer Abel; Jamey Heath; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Justin Baldoni; Melissa Nathan	Attachment to entry 134. This document was prepared by Mr. Baldoni in response to Liner Freedman's requests for information and evidence to enable provision of informed legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product; Common Interest
136	1/6/2025 0:34	Jed Wallace	Bryan Freedman; Jennifer Abel; Jamey Heath; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Justin Baldoni; Melissa Nathan	Attachment to entry 134. Voice note communication from Jed Wallace conveying information to Liner Freedman, as requested, to enable provision of informed legal advice re factual defenses to Lively's allegations and potential affirmative claims.	Attorney-Client Communication; Work Product; Common Interest
137	1/6/2025 0:34	Jed Wallace	Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz, Justin Baldoni; Melissa Nathan	Attachment to entry 134. Voice note communication from Jed Wallace conveying information to Liner Freedman, as requested, to enable provision of informed legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
138	1/6/2025 0:34	Jed Wallace	Bryan Freedman; Jennifer Abel; Jamey Heath; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz, Justin Baldoni; Melissa Nathan	Attachment to entry 134. Voice note communication from Jed Wallace conveying information to Liner Freedman, as requested, to enable provision of informed legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product; Common Interest
139	1/6/2025 0:34	Jed Wallace	Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Justin Baldoni; Melissa Nathan	Attachment to entry 134. Voice note communication from Jed Wallace conveying information to Liner Freedman, as requested, to enable provision of informed legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product; Common Interest
140	1/6/2025 0:34	Bryan Freedman	Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Justin Baldoni; Melissa Nathan;	Attachment to entry 134. Document prepared by and at the direction of Bryan Freedman analyzing significance of evidence and legal theories for defense and prosecution of claims against Lively and Jones/Jonesworks.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
141	1/6/2025 0:34	Jed Wallace	Justin Baldoni; Melissa Nathan; Bryan Freedman; Jennifer Abel; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 134. Voice note communication from Jed Wallace conveying information to Liner Freedman, as requested, to enable provision of informed legal advice re factual defenses to Lively's allegations.	Attorney-Client Communication; Work Product; Common Interest
142	1/6/2025 3:57	Spencer Freedman; Melissa Nathan	Spencer Freedman; Melissa Nathan	Communication seeking information intended to be conveyed to attorney to enable provision of informed legal advice re factual bases for potential claims against Lively and others.	Attorney-Client Communication; Work Product
143				This document will be produced by December 8, 2025.	
144	1/6/2025 13:05	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Attorney-client communication conveying information to attorney to enable provision of informed legal advice with respect to damages resulting from claims against Lively and others.	Attorney-Client Communication; Work Product
145	1/6/2025 18:15	Spencer Freedman	Spencer Freedman; Jennifer Abel	Communication conveying information from attorney and seeking information necessary to enable provision of informed legal advice with respect to potential claims against Leslie Sloane.	Attorney-Client Communication; Work Product
146	1/6/2025 18:15	Spencer Freedman	Jennifer Abel	Attachment to entry 145. Document prepared by Spencer Freedman at the direction of Bryan Freedman containing Bryan Freedman's legal theory and analysis of evidence in support of potential claims against Leslie Sloane.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
147	1/7/2025 0:02	Jamey Heath; Justin Baldoni; Mitra Ahouraian; Theresa Troupson; Bryan Freedman; Jed Wallace; Mitz Toskovic; Jason Sunshine; Summer Benson	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information to attorney to enable provision of informed legal advice re drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
148	1/7/2025 0:02	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 147. This voice note communication from Jed Wallace comments on the significance of evidence gathered at the request of Liner Freedman to enable provision of informed legal advice re drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
149	1/7/2025 0:02	Mitz Toskovic	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 147. Notes from a conversation with Jamey Heath and Justin Baldoni, conducted in the presence of attorneys Mitra Ahouraian, Bryan Freedman, and Summer Benson, on December 23, 2024 discussing factual allegations in Lively's complaint.	Attorney-Client Communication; Work Product; Common Interest
150				This document is part of the document previously produced bearing Bates number WAYFARER 00140494.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
151	1/7/2025 10:10	Jennifer Abel	Spencer Freedman; Jennifer Abel	Communication conveying information intended to be conveyed to attorney to enable provision of informed legal advice with respect to drafting federal complaint.	Attorney-Client Communication; Work Product
152	1/8/2025 0:03	Mitra Ahouraian; Jennifer Abel; Mitz Toskovic; Justin Baldoni; Bryan Freedman; Jamey Heath; Melissa Nathan; Theresa Troupson; Jed Wallace	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and conveying information to attorney to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
153	1/8/2025 0:04	Jason Sunshine; Jennifer Abel	Jennifer Abel; Jason Sunshine	Attorney-client communication seeking information necessary to drafting federal complaint.	Attorney-Client Communication; Work Product
154	1/8/2025 5:09	Justin Baldoni; Michael Garlie	Justin Baldoni; Michael Garlie	Communication between client and attorney's agent regarding collection and preservation of evidence in response to legal action filed by Lively.	Attorney-Client Communication; Work Product
155	1/8/2025 10:54	Jennifer Abel	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding service of summons on client.	Attorney-Client Communication; Work Product; Common Interest
156	1/8/2025 15:29	Brooke Denham	Brooke Denham; Steve Sarowitz	Communication by Mr. Sarowitz's executive assistant conveying request from Liner Freedman for information relating to removal of Jonesworks' action from state court.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
157	1/9/2025 1:12	Justin Baldoni; Mitz Toskovic; Jason Sunshine; Jamey Heath; Jed Wallace; Bryan Freedman	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
158	1/9/2025 1:12	Justin Baldoni	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 157. Communication between Bryan Freedman, Justin Baldoni and forensic discovery vendor expert regarding collection of evidence for Lively and Jonesworks' lawsuits.	Attorney-Client Communication; Work Product; Common Interest
159	1/9/2025 1:12	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
160				This document will be produced by December 8, 2025.	
161	1/10/2025 10:27	Jamey Heath; Melissa Nathan	Jamey Heath; Melissa Nathan	Communication regarding attorneys' legal advice with respect to inclusion of allegations in federal complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
162	1/10/2025 14:55	Jamey Heath; Mitra Ahouraian; Justin Baldoni	Jamey Heath; Mitra Ahouraian; Justin Baldoni	Attorney-client communication regarding terms of client's engagement of the Law Offices of Mitra Ahouraian.	Attorney-Client Communication; Work Product; Common Interest
163	1/10/2025 14:55	Mitra Ahouraian	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attorney-client communication attachment reflecting terms of client's engagement of the Law Offices of Mitra Ahouraian.	Attorney-Client Communication; Work Product; Common Interest
164	1/10/2025 14:55	Mitra Ahouraian	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attorney-client communication attachment reflecting terms of client's engagement of the Law Offices of Mitra Ahouraian.	Attorney-Client Communication; Work Product; Common Interest
165	1/10/2025 14:55	Justin Baldoni	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attorney-client communication attachment reflecting terms of client's engagement of the Law Offices of Mitra Ahouraian.	Attorney-Client Communication; Work Product; Common Interest
166	1/10/2025 14:55	Justin Baldoni	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attorney-client communication attachment reflecting terms of client's engagement of the Law Offices of Mitra Ahouraian.	Attorney-Client Communication; Work Product; Common Interest
167	1/10/2025 14:55	Mitra Ahouraian	Justin Baldoni; Jamey Heath; Mitra Ahouraian	Attorney-client communication attachment reflecting terms of client's engagement of the Law Offices of Mitra Ahouraian.	Attorney-Client Communication; Work Product; Common Interest
168	1/10/2025 16:48	Mitz Toskovic; Jed Wallace; Jamey Heath; Summer Benson; Mitra Ahouraian	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
169	1/10/2025 23:25	Jennifer Abel; Jason Sunshine	Jennifer Abel; Jason Sunshine	Attorney-client communication conveying legal advice to client regarding removal of New York state court suit to federal court.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
170	1/11/2025 6:01	Justin Baldoni; Jason Sunshine; Mitra Ahouraian; Ahmed Musiol; Summer Benson; Jed Wallace; Jamey Heath	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
171	1/11/2025 6:01	Justin Baldoni	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
172	1/11/2025 6:01	Justin Baldoni	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
173	1/11/2025 6:01	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
174	1/11/2025 6:01	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
175	1/11/2025 6:01	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
176	1/11/2025 12:26	Mitz Toskovic; Justin Baldoni	Mitz Toskovic; Justin Baldoni	Communication between company executives regarding locating and conveying information to attorney to enable provision of informed legal services regarding preparation of draft federal complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
177	1/12/2025 1:38	Ahmed Musiol; Justin Baldoni; Bryan Freedman; Theresa Troupson; Jamey Heath; Mitra Ahouraian; Melissa Nathan; Jennifer Abel; Jed Wallace; Jason Sunshine; Mitz Toskovic	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
178	1/12/2025 20:30	Jennifer Abel; Jason Sunshine	Jennifer Abel; Jason Sunshine	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting federal complaint.	Attorney-Client Communication; Work Product
179	1/12/2025 20:30	Jennifer Abel	Jason Sunshine	Attachment to entry 178. This document was prepared by Jennifer Abel at the request of Jason Sunshine for purposes of enabling Mr. Sunshine to provide informed legal advice regarding the drafting of the counterclaim in the Jonesworks' action and for the Lively lawsuit defense and prosecution.	Attorney-Client Communication; Work Product
180	1/13/2025 0:23	Theresa Troupson; Jason Sunshine; Mitra Ahouraian; Steve Sarowitz; Jennifer Abel; Jed Wallace; Jamey Heath; Melissa Nathan; Mitz Toskovic; Ahmed Musiol; Justin Baldoni;	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
181				This document will be produced by December 8, 2025.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
182	1/13/2025 0:23	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 180. Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
183	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 180. Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
184	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan;	Attachment to entry 180. Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
185	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 180. Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
186	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 180. Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
187	1/13/2025 0:23	Mitz Toskovic	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment reflecting attorney work product relating to drafting of complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
188	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 180 (out of order on log). Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
189	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 180 (out of order on log). Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
190	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 180 (out of order on log). Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
191	1/13/2025 0:23	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan;	Attachment to entry 180 (out of order on log). Voice note from Jed Wallace reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding drafting complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
192	1/13/2025 7:20	Jennifer Abel; Jamey Heath; Jason Sunshine; Justin Baldoni; Melissa Nathan; Mitra Ahouraian; Mitz Toskovic; Jed Wallace; Steve Sarowitz	Ahmed Musiol; Breanna Butler Koslow; Bryan Freedman; Jennifer Abel; Jamey Heath; Jared Freedman; Jason Sunshine; Justin Baldoni; Kevin Fritz; Melissa Nathan; Mitra Ahouraian; Mitz Toskovic; Spencer Freedman; Jed Wallace; Steve Sarowitz; Summer Benson; Tera Hanks; Theresa Troupson	Attorney-client communication reflecting attorney work product relating to drafting of complaint and potential publication of legal pleadings.	Attorney-Client Communication; Work Product; Common Interest
193	1/13/2025 10:53	Jed Wallace	Bryan Freedman; Jed Wallace; Steve Sarowitz	Attorney-client communication providing information to attorney to enable provision of informed legal advice with respect to legal response to allegations by Blake Lively and others and drafting complaint.	Attorney-Client Communication; Work Product; Common Interest
194	1/13/2025 10:53	Jed Wallace	Bryan Freedman; Jed Wallace; Steve Sarowitz	Attorney-client communication attachment providing information to attorney to enable provision of informed legal advice with respect to legal response to allegations by Blake Lively and others and drafting complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
195	1/14/2025 2:03	Mitz Toskovic; Justin Baldoni	Mitz Toskovic; Justin Baldoni	Communication conveying information to be conveyed to attorney to enable provision of informed legal advice with respect to drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
196	1/14/2025 3:54	Steve Sarowitz; Ahmed Musiol; Melissa Nathan; Jamey Heath; Theresa Troupson; Jason Sunshine; Justin Baldoni; Mitra Ahouraian; Jed Wallace; Bryan Freedman; Spencer Freedman	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and conveying legal advice with respect to drafting federal complaint.	Attorney-Client Communication; Work Product; Common Interest
197				This document will be produced by December 8, 2025.	
198	1/14/2025 11:10	Jed Wallace; Steve Sarowitz	Bryan Freedman; Jed Wallace; Steve Sarowitz	Attorney-client communication conveying information necessary to enable provision of legal advice regarding third-party witness subpoenas in discovery.	Attorney-Client Communication; Work Product; Common Interest
199				This document will be produced by December 8, 2025.	
200				This document will be produced by December 8, 2025.	
201	1/14/2025 11:10	Jed Wallace	Bryan Freedman; Jennifer Abel; Jamey Heath; Jared Freedman; Jason Sunshine; Justin Baldoni; Kevin Fritz; Melissa Nathan; Mitra Ahouraian; Mitz Toskovic; Spencer Freedman; Jed Wallace; Steve Sarowitz; Summer Benson; Tera Hanks; Theresa Troupson; Ahmed Musiol; Breanna Butler Koslow	Attachment to entry 192 (out of order on log). Voice note from Jed Wallace providing information requested by Liner Freedman for the purpose of enabling counsel to provide informed legal advice with respect to managing legal risks incurred in connection with publishing legal pleadings.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
202	1/15/2025 0:01	Steve Sarowitz; Justin Baldoni; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Melissa Nathan; Jed Wallace; Jamey Heath; Jennifer Abel	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and conveying legal advice regarding drafting complaint.	Attorney-Client Communication; Work Product; Common Interest
203	1/15/2025 1:49	Jennifer Abel; Mitra Ahouraian	Jennifer Abel; Mitra Ahouraian	Attorney-client communication seeking and conveying information necessary to enable provision of informed legal advice regarding drafting complaint.	Attorney-Client Communication; Work Product
204	1/15/2025 14:49	Jennifer Abel	Jennifer Abel; Theresa Troupson; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding drafting and filing federal complaint.	Attorney-Client Communication; Work Product; Common Interest
205	1/15/2025 16:25	Mitz Toskovic; Justin Baldoni	Mitz Toskovic; Justin Baldoni	Communication seeking and conveying information to be conveyed to attorney as necessary to enable provision of informed legal advice regarding drafting and filing federal complaint.	Attorney-Client Communication; Work Product; Common Interest
206	1/16/2025 0:36	Melissa Nathan; Jason Sunshine	Melissa Nathan; Jason Sunshine	Communication seeking and conveying information necessary to enable provision of informed legal advice regarding drafting and filing federal complaint and corporate disclosures for The Agency Group PR LLC.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
207	1/16/2025 9:07	Jennifer Abel; Theresa Troupson; Jason Sunshine; Summer Benson	Jennifer Abel; Theresa Troupson; Summer Benson; Melissa Nathan; Jason Sunshine	Communication seeking and conveying information necessary to enable provision of informed legal advice regarding drafting and filing federal complaint and corporate disclosures for RWA Communications LLC.	Attorney-Client Communication; Work Product; Common Interest
208	1/16/2025 9:07	Theresa Troupson	Jennifer Abel; Jason Sunshine; Summer Benson; Theresa Troupson; Melissa Nathan	Attorney-client communication conveying legal advice regarding legal ramifications of public statement by Lively in response to federal complaint.	Attorney-Client Communication; Work Product; Common Interest
209	1/16/2025 9:07	Theresa Troupson	Jennifer Abel; Jason Sunshine; Summer Benson; Theresa Troupson; Melissa Nathan	Attorney-client communication conveying legal advice regarding legal ramifications of public statement by Lively in response to federal complaint.	Attorney-Client Communication; Work Product; Common Interest
210	1/16/2025 10:51	Theresa Troupson; Justin Baldoni; Jed Wallace; Melissa Nathan; Ahmed Musiol; Steve Sarowitz; Jennifer Abel; Jason Sunshine; Summer Benson; Mitra Ahouraian; Bryan Freedman	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to provision of informed legal advice regarding filing of federal complaint and service of summons on client.	Attorney-Client Communication; Work Product; Common Interest
211	1/16/2025 10:51	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 210. Voice note from Jed Wallace raising potential issue with Liner Freedman regarding PII issues in connection with filing of federal complaint and service of summons on complaint.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
212	1/16/2025 10:51	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 210. Voice note from Jed Wallace raising potential issue with Liner Freedman regarding PII issues in connection with filing of federal complaint and service of summons on complaint.	Attorney-Client Communication; Work Product; Common Interest
213	1/16/2025 10:51	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding Lively's public response to federal complaint.	Attorney-Client Communication; Work Product; Common Interest
214	1/16/2025 13:11	Breanna Butler Koslow	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication conveying information necessary to enable provision of informed legal advice regarding redaction of federal complaint.	Attorney-Client Communication; Work Product; Common Interest
215	1/16/2025 13:11	Breanna Butler Koslow	Jennifer Abel; Melissa Nathan; Bryan Freedman; Summer Benson; Miles Cooley; Carolina Hurley; Jed Wallace; Breanna Butler Koslow; Mitra Ahouraian; Spencer Freedman; Jason Sunshine; Jared Freedman; Katie Case	Attachment to entry 214. Document conveying concerns of TAG regarding potential disclosure of PII in connection with federal complaint and seeking legal advice from Liner Freedman regarding same.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
216	1/19/2025 0:08	Mitra Ahouraian; Bryan Freedman; Melissa Nathan; Jamey Heath; Justin Baldoni; Jennifer Abel; Steve Sarowitz; Jed Wallace; Mitz Toskovic	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and providing information necessary to enable provision of informed legal advice regarding legal ramifications of release of dailies footage owned by It Ends With Us Movie LLC and regarding potential legal responses to religiously motivated attacks from social media accounts believed to be affiliated with Lively.	Attorney-Client Communication; Work Product; Common Interest
217	1/19/2025 0:08	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 216. Voice note from Jed Wallace providing information to Liner Freedman necessary to enable provision of informed legal advice regarding potential legal responses to religiously motivated attacks from social media accounts believed to be affiliated with Lively.	Attorney-Client Communication; Work Product; Common Interest
218	1/19/2025 0:08	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 216. Voice note from Jed Wallace providing information to Liner Freedman necessary to enable provision of informed legal advice regarding potential legal responses to religiously motivated attacks from social media accounts believed to be affiliated with Lively.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
219	1/19/2025 0:08	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 216. Voice note from Jed Wallace providing information to Liner Freedman necessary to enable provision of informed legal advice regarding potential legal responses to religiously motivated attacks from social media accounts believed to be affiliated with Lively.	Attorney-Client Communication; Work Product; Common Interest
220	1/22/2025 0:27	Mitra Ahouraian; Jennifer Abel	Jennifer Abel; Mitra Ahouraian	Attorney-client communication seeking and conveying information necessary to enable provision of informed legal advice with respect to potential amendment of complaint.	Attorney-Client Communication; Work Product
221	1/22/2025 0:27	Mitra Ahouraian	Mitra Ahouraian; Jennifer Abel	Attorney-client communication attachment conveying information necessary to enable provision of informed legal advice with respect to potential amendment of complaint.	Attorney-Client Communication; Work Product
222	1/22/2025 0:29	Bryan Freedman; Justin Baldoni; Mitra Ahouraian; Steve Sarowitz; Melissa Nathan; Jed Wallace; Theresa Troupson; Jason Sunshine; Jennifer Abel	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying legal advice with respect to Lively's filing demand for judicial conference regarding public statements by counsel.	Attorney-Client Communication; Work Product; Common Interest
223				This document will be produced by December 8, 2025.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
224	1/22/2025 18:36	Jennifer Abel	Jamey Heath; Jennifer Abel; Bryan Freedman; Summer Benson; Melissa Nathan	Attorney-client communication conveying information necessary to enable provision of legal advice regarding prior representation of potentially adverse party.	Attorney-Client Communication; Work Product; Common Interest
225				This document will be produced by December 8, 2025.	
226	1/23/2025 4:47 PM	Jennifer Abel; Jed Wallace; Mitra Ahouraian; Melissa Nathan	Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Melissa Nathan	Attorney-client communication providing legal advice and direction regarding cooperation with internal investigation.	Attorney-Client Communication; Work Product; Common Interest
227	1/23/2025 4:58 PM	Jennifer Abel; Jed Wallace; Mitra Ahouraian; Melissa Nathan	Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Melissa Nathan	Attorney-client communication providing legal advice and direction regarding cooperation with internal investigation.	Attorney-Client Communication; Work Product; Common Interest
228	1/24/2025 12:01 AM	Justin Baldoni; Jed Wallace; Jason Sunshine; Jennifer Abel; Mitra Ahouraian ; Jamey Heath; Mitz Toskovic; Melissa Nathan; Bryan Freedman	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and providing information to facilitate provision of informed legal advice regarding factual support for legal defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.; provision of legal advice regarding same subjects.	Attorney-Client Communication; Work Product; Common Interest
229	1/24/2025 12:01 AM	Jed Wallace	Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz; Jennifer Abel; Melissa Nathan	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
230	1/24/2025 12:01 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
231	1/24/2025 12:01 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
232	1/24/2025 12:01 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
233	1/24/2025 12:01 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
234	1/24/2025 12:01 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
235	1/24/2025 12:01 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
236	1/24/2025 12:01 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 228. Voice note from Jed Wallace providing information requested by Liner Freedman for purposes of providing informed legal advice regarding defenses to lawsuit filed by Blake Lively and amending of complaint against Lively et al.	Attorney-Client Communication; Work Product; Common Interest
237	1/24/2025 7:12 PM	Melissa Nathan; Jason Sunshine	Melissa Nathan; Jason Sunshine	Attorney-client communication providing legal advice regarding corporate disclosure for The Agency Group PR, LLC.	Attorney-Client Communication; Work Product
238	1/24/2025 7:12 PM	Jason Sunshine; Melissa Nathan	Jason Sunshine; Melissa Nathan	Attorney-client communication attachment providing legal advice regarding corporate disclosure for The Agency Group PR, LLC.	Attorney-Client Communication; Work Product
239	1/25/2025 1:56 AM	Mitra Ahouraian; Jason Sunshine; Jamey Heath; Jed Wallace; Bryan Freedman; Melissa Nathan; Justin Baldoni; Jennifer Abel; Summer Benson; Steve Sarowitz	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking legal advice relating to potential legal theories and claims against Blake Lively and Ryan Reynolds as well as legal advice regarding strategy in response to judicial officer assignment.	Attorney-Client Communication; Work Product; Common Interest
240	1/25/2025 1:56 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information to attorneys necessary to facilitate provision of informed legal advice regarding strategy in response to judicial officer assignment.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
241	1/25/2025 1:56 AM	Justin Baldoni	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to facilitate provision of informed legal advice regarding amending complaint against Lively et al. and asserting defenses in response to claims by Lively.	Attorney-Client Communication; Work Product; Common Interest
242	1/25/2025 1:56 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication conveying information necessary to facilitate provision of informed legal advice regarding amending complaint against Lively et al. and asserting defenses in response to claims by Lively.	Attorney-Client Communication; Work Product; Common Interest
243	1/25/2025 1:56 AM	Bryan Freedman	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment conveying information necessary to providing and understanding legal advice regarding legal strategy judicial officer assignment.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
244	1/26/2025 12:03 AM	Jamey Heath; Steve Sarowitz; Bryan Freedman; Melissa Nathan; Jed Wallace; Justin Baldoni; Mitra Ahouraian; Mitz Toskovic; Jennifer Abel; Ahmed Musiol; Jason Sunshine	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and providing legal advice regarding use of evidence gathered in support of response to allegations made by Blake Lively in her lawsuit for purposes of amending complaint.	Attorney-Client Communication; Work Product; Common Interest
245				This document will be produced by December 8, 2025.	
246	1/26/2025 1:50 AM	Jamey Heath; Mitz Toskovic	Jamey Heath; Mitz Toskovic	Communication between company executives regarding providing response to Liner Freedman's requests for information and evidence to support preservation of documents and evidence relating to Lively's lawsuit.	Attorney-Client Communication; Work Product; Common Interest
247	1/26/2025 3:04 AM	Bryan Freedman; Justin Baldoni	Bryan Freedman; Justin Baldoni	Attorney-client communication seeking and providing legal advice regarding collection and preservation of evidence gathered in support of defenses to allegations in lawsuit filed by Blake Lively and amending complaint.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
248	1/27/2025 1:40 AM	Jamey Heath; Justin Baldoni; Melissa Nathan; Jed Wallace; Steve Sarowitz; Jason Sunshine; Summer Benson; Jennifer Abel; Ahmed Musiol; Mitra Ahouraian; Mitz Toskovic	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communications seeking and providing legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company; attorney-client communication seeking legal advice regarding response to M. Gottlieb's January 27 letter requesting court conference to discuss extrajudicial statements.	Attorney-Client Communication; Work Product; Common Interest
249				This document will be produced by December 8, 2025.	
250	1/27/2025 11:21 AM	Jennifer Abel; Melissa Nathan; Jason Sunshine	Jennifer Abel; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication providing legal advice relating to removal of Stephanie Jones/Jonesworks lawsuit.	Attorney-Client Communication; Common Interest
251	1/27/2025 11:21 AM	Melissa Nathan; Jason Sunshine; Jennifer Abel;	Jennifer Abel; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication providing legal advice relating to removal of Stephanie Jones/Jonesworks lawsuit.	Attorney-Client Communication; Common Interest
252	1/27/2025 10:27 PM	Mitz Toskovic; Melissa Nathan	Mitz Toskovic; Melissa Nathan	Communication conveying information necessary to seeking informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
253	1/28/2025 12:36 AM	Mitra Ahouraian; Jennifer Abel; Melissa Nathan; Bryan Freedman; Theresa Troupson; Justin Baldoni; Steve Sarowitz; Jed Wallace; Mitz Toskovic; Jason Sunshine; Ahmed Musiol; Jamey Heath	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and providing legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
254	1/28/2025 12:45 AM	Mitz Toskovic; Melissa Nathan	Mitz Toskovic; Melissa Nathan	Communication necessary to providing attorneys with information to facilitate provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
255	1/28/2025 10:14 AM	Carolina Hurley; Melissa Nathan; Jason Sunshine	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication providing information necessary to facilitate provision of informed legal advice and seeking legal advice regarding possible claims against the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
256	1/28/2025 8:48 PM	Melissa Nathan	Jamey Heath; Melissa Nathan	Communication necessary to providing attorneys with information to facilitate provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
257	1/29/2025 12:06 AM	Ahmed Musiol; Jed Wallace; Jason Sunshine; Justin Baldoni; Mitra Ahouraian; Melissa Nathan; Jennifer Abel; Jamey Heath	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication providing information necessary to facilitate provision of informed legal advice and seeking said legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
258	1/29/2025 12:06 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment providing information necessary to facilitate provision of informed legal advice and reflecting work product regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
259				This document will be produced by December 8, 2025.	
260	1/29/2025 1:15 AM	Mitz Toskovic; Melissa Nathan	Mitz Toskovic; Melissa Nathan	Communication necessary to providing attorneys with information to facilitate provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
261	1/29/2025 9:27 AM	Caroline Hurley; Jed Wallace	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication providing information necessary to the provision of informed legal advice and seeking legal advice regarding possible claims against the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
262	1/29/2025 5:08 PM	Jamey Heath; Mitz Toskovic; Jed Wallace; Melissa Nathan	Jamey Heath; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Summer Benson; Melissa Nathan	Attorney-client communication providing information necessary to the provision of informed legal advice and seeking legal advice regarding possible claims against Blake Lively and defenses to her allegations.	Attorney-Client Communication; Work Product; Common Interest
263	1/29/2025 5:25 PM	Jed Wallace; Mitz Toskovic	Jamey Heath; Jennifer Abel; Theresa Troupson; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Summer Benson; Melissa Nathan; Mitz Toskovic; Tera Hanks	Attorney-client communication providing information necessary to the provision of informed legal advice and seeking legal advice regarding possible claims against Blake Lively and defenses to her allegations.	Attorney-Client Communication; Work Product; Common Interest
264	1/29/2025 8:58 PM	Jamey Heath; Melissa Nathan	Jamey Heath; Jennifer Abel; Bryan Freedman; Melissa Nathan	Attorney-client communication seeking legal advice regarding filing of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Common Interest
265	1/29/2025 9:05 PM	Mitz Toskovic; Jennifer Abel	Mitz Toskovic; Jennifer Abel	Communication providing information necessary to seeking legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
266	1/29/2025 9:05 PM	Mitz Toskovic	Jennifer Abel	Attachment to entry 265. Document reflecting information requested by Liner Freedman for potential inclusion or analysis for purposes of Liner Freedman's preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
267	1/30/2025 1:37 AM	Summer Benson; Theresa Troupson; Mitz Toskovic; Jennifer Abel; Tera Hanks; Steve Sarowitz; Justin Baldoni; Jamey Heath; Melissa Nathan; Jed Wallace; Mitra Ahouraian; Jennifer Abel; Ahmed Musiol	Bryan Freedman; Summer Benson; Theresa Troupson; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol; Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel	Attorney-client communication seeking and reflecting legal advice from Liner Freedman regarding pending litigation strategy, including preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company; discussion regarding Liner Freedman's legal advice on publication of amended complaint on website. This document will be produced in redacted form by December 8, 2025.	Attorney-Client Communication; Work Product; Common Interest
267A	1/30/2025 1:37 AM	Jed Wallace	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attachment to entry 267. Attorney-client communication providing information to Liner Freedman Taitelman + Cooley and Meister Seelig & Fein regarding metadata indicating dates of creation of New York Times article and accompanying multimedia to be incorporated into amended complaint. <i>Note: Inadvertently omitted from prior privilege log.</i>	Attorney-Client Communication; Work Product; Common Interest
268				This document will be produced by December 8, 2025.	
269	1/30/2025 10:07 AM	Jed Wallace	Jamey Heath; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Summer Benson; Melissa Nathan	Attorney-client communication seeking legal advice relating to potential third-party witnesses in response to claims by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
270	1/30/2025 8:42 PM	Mitz Toskovic	Mitz Toskovic; Melissa Nathan	Communication providing information to be conveyed to attorney as necessary to provision of informed legal advice regarding tortious interference claim against Ryan Reynolds.	Attorney-Client Communication; Work Product; Common Interest
271	1/31/2025 1:05 AM	Bryan Freedman; Ahmed Musiol; Jed Wallace; Mitz Toskovic; Melissa Nathan; Justin Baldoni; Mitra Ahouraian; Theresa Troupson; Jennifer Abel; Jamey Heath; Jason Sunshine; Steve Sarowitz; Summer Benson; Tera Hanks	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication seeking and providing information necessary to provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
272	1/31/2025 1:05 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to 271. Voice note from Jed Wallace providing information requested by Liner Freedman for the purpose of providing informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
273	1/31/2025 1:05 AM	Mitz Toskovic	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment containing work product and providing information necessary to provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
274	1/31/2025 1:05 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 273. Voice note from Jed Wallace providing information requested by Liner Freedman for the purpose of providing informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
275	1/31/2025 1:05 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 273. Voice note from Jed Wallace providing information requested by Liner Freedman for the purpose of providing informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
276	1/31/2025 1:05 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 273. Voice note from Jed Wallace providing information requested by Liner Freedman for the purpose of providing informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
277				This document will be produced by December 8, 2025.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
278	1/31/2025 1:05 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 273. Voice note from Jed Wallace providing information requested by Liner Freedman for the purpose of providing informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
279	1/31/2025 1:25 AM	Mitz Toskovic; Melissa Nathan	Mitz Toskovic; Melissa Nathan	Communication providing information to be conveyed to attorney to facilitate provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
280	1/31/2025 1:39 AM	Mitz Toskovic; Justin Baldoni	Mitz Toskovic; Justin Baldoni	Communication seeking information to be conveyed to attorney to facilitate provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
281	1/31/2025 1:39 AM	Mitz Toskovic; Justin Baldoni	Mitz Toskovic; Justin Baldoni	Communication attachment reflecting attorney work product regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
282	1/31/2025 1:39 AM	Mitz Toskovic; Justin Baldoni	Mitz Toskovic; Justin Baldoni	Communication attachment reflecting attorney work product regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
283	1/31/2025 4:07 AM	Ahmed Musiol; Mitz Toskovic	Ahmed Musiol; Jamey Heath; Mitz Toskovic	Communication providing information to be conveyed to attorney to facilitate provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product
284	1/31/2025 4:34 PM	Mitz Toskovic; Jennifer Abel	Jamey Heath; Mitz Toskovic; Jennifer Abel	Communication providing information to be conveyed to attorney to facilitate provision of informed legal advice regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
285	1/31/2025 4:34 PM	Mitz Toskovic	Jennifer Abel; Jamey Heath; Mitz Toskovic	Communication attachment reflecting attorney work product regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
286	1/31/2025 4:34 PM	Mitz Toskovic	Jennifer Abel; Jamey Heath; Mitz Toskovic	Communication attachment reflecting attorney work product regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
287	1/31/2025 4:34 PM	Mitz Toskovic	Jennifer Abel; Jamey Heath; Mitz Toskovic	Communication attachment reflecting attorney work product regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
288	1/31/2025 4:34 PM	Mitz Toskovic	Jennifer Abel; Jamey Heath; Mitz Toskovic	Communication attachment reflecting attorney work product regarding preparation of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
289	1/31/2025 7:30 PM	Theresa Troupson; Jason Sunshine; Summer Benson; Jennifer Abel; Melissa Nathan;	Jennifer Abel; Theresa Troupson; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication seeking legal advice from Liner Freedman regarding filing of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company and seeking legal advice regarding legal permissibility of sharing filed pleading with press. This document will be produced in redacted form by December 8, 2025.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
290	1/31/2025 7:34 PM	Theresa Troupson; Summer Benson; Melissa Nathan; Jason Sunshine; Jennifer Abel;	Jennifer Abel; Theresa Troupson; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication seeking legal advice from Liner Freedman regarding filing of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company and seeking legal advice regarding legal permissibility of sharing filed pleading with press. This document will be produced in redacted form by December 8, 2025.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
291	2/1/2025 12:02 AM	Jennifer Abel; Jed Wallace; Jamey Heath; Mitra Ahouraian; Justin Baldoni; Bryan Freedman; Melissa Nathan; Jason Sunshine; Ahmed Musiol; Mitz Toskovic; Tera Hanks	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	<p>Attorney-client communication seeking legal advice from Liner Freedman regarding filing of amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company; reflecting Liner Freedman's request for information and clients' conveyance of information necessary to enable provision of informed legal advice regarding prosecution of claims against Lively, the New York Times et al. and defense against claims by Lively, including information regarding apparent attempts to silence social media creators critical of Lively and others.; and reflecting request for legal advice from Liner Freedman, and providing information requested by Liner Freedman, regarding potential liability of New York Times to Wayfarer Parties based on newly issued statement by New York Times in response to the Wayfarer Parties' amended complaint.</p> <p>This document will be produced in redacted form by December 8, 2025.</p>	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
291A	2/1/2025 12:02 AM	Jed Wallace	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attachment to entry 291. Jed Wallace voice note providing information requested by Liner Freedman Taitelman + Cooley and Meister Seelig & Fein attorneys regarding apparent attempts to silence social media creators critical of Lively and others. <i>Note: Inadvertently omitted from previous privilege log.</i>	Attorney-Client Communication; Work Product; Common Interest
291B				This document will be produced by December 8, 2025. <i>Note: Inadvertently omitted from previous privilege log.</i>	
292	2/1/2025 12:02 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 291. Voice note from Jed Wallace providing information requested by Liner Freedman regarding potential liability of New York Times to Wayfarer Parties based on newly issued statement by New York Times in response to the Wayfarer Parties' amended complaint.	Attorney-Client Communication; Work Product; Common Interest
293	2/1/2025 12:02 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 291. Voice note from Jed Wallace providing information requested by Liner Freedman to enable the attorneys to provide legal advice regarding prosecution of newly filed claims against the New York Times.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
294	2/1/2025 12:02 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment seeking legal advice regarding the amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and The New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
295	2/1/2025 12:02 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 291. Jed Wallace voice note providing information requested by Liner Freedman to enable the attorneys to provide legal advice regarding prosecution of newly filed claims against the New York Times.	Attorney-Client Communication; Work Product; Common Interest
296	2/1/2025 12:02 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment providing information necessary to provision of informed legal advice regarding amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and the New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
297				This document will be produced by December 8, 2025.	
298				This document will be produced by December 8, 2025.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
299	2/1/2025 12:02 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 291. Jed Wallace voice note seeking legal advice regarding the amended pleading against Blake Lively, Ryan Reynolds, Leslie Sloane, Vision PR, and The New York Times Company.	Attorney-Client Communication; Work Product; Common Interest
300	2/1/2025 1:02 AM	Jason Sunshine; Jennifer Abel; Melissa Nathan; Theresa Troupson; Summer Benson	Jennifer Abel; Theresa Troupson; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication seeking legal advice regarding filing issue related to amended pleading and preparation for February 3 court conference.	Attorney-Client Communication; Work Product; Common Interest
301	2/1/2025 10:18 PM	Melissa Nathan; Jason Sunshine	Melissa Nathan; Jason Sunshine	Attorney-client communication seeking and providing legal advice regarding legal ramifications of media strategy in support of litigation objectives in preparation for the February 3 court conference. This communication also contains a draft of a proposed public statement written by Melissa Abel and proposed to be made by Bryan Freedman, which was forwarded to attorney Jason Sunshine for legal advice regarding the contents of the statement. The statement was never issued by Mr. Freedman.	Attorney-Client Communication; Work Product; Common Interest
302				This document will be produced, with non-responsive portions redacted, by December 8, 2025.	
303				This document will be produced by December 8, 2025.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
303A	2/3/2025 10:07 AM	Jed Wallace; Steve Sarowitz; Melissa Nathan; Jennifer Abel; Summer Benson; Mitra Ahouraian; Theresa Troupson; Jason Sunshine; Jamey Heath; Bryan Freedman; Justin Baldoni; Mitz Toskovic; Ahmed Musiol	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication evaluating February 3 judicial conference and providing information requested by Liner Freedman and provided by Justin Baldoni relating to third party witness Taylor Swift's involvement and potential deposition. This document will be produced in redacted form by December 8, 2025. <i>Note: Inadvertently omitted from previous privilege log.</i>	Attorney-Client Communication; Work Product; Common Interest
304	2/3/2025 10:07 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to entry 303A. Jed Wallace voice note commenting on significance of information requested by Liner Freedman and provided by Justin Baldoni relating to third party witness Taylor Swift's involvement and potential deposition.	Attorney-Client Communication; Work Product; Common Interest
305				This document will be produced by December 8, 2025.	
306	2/3/2025 1:35 PM	Melissa Nathan; Jason Sunshine	Melissa Nathan; Jason Sunshine	Attorney-client communication seeking and providing legal advice concerning litigation strategy and analysis of outcomes from the February 3 court conference.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
307	2/3/2025 1:45 PM	Melissa Nathan	Jennifer Abel; Theresa Troupson; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication conveying information necessary to provision of informed legal advice concerning discovery strategy in connection with ongoing litigation.	Attorney-Client Communication; Work Product; Common Interest
308	2/3/2025 4:15 PM	Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Jason Sunshine	Spencer Freedman; Jennifer Abel; Bryan Freedman; +13109137283 Miles Cooley; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Carolina Hurley; Melissa Nathan; Jason Sunshine; Jared Freedman; Katie Case	Attorney-client communication seeking and providing legal advice concerning litigation strategy and analysis of outcomes from the February 3 court conference.	Attorney-Client Communication; Work Product; Common Interest
309	2/4/2025 12:11 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Attorney-client communication seeking and providing legal advice concerning litigation strategy and analysis of outcomes from the February 3 court conference.	Attorney-Client Communication; Work Product
310	2/4/2025 12:27 AM	Mitra Ahouraian; Jed Wallace; Jamey Heath; Justin Baldoni; Mitz Toskovic; Bryan Freedman; Melissa Nathan; Jed Wallace; Jennifer Abel; Steve Sarowitz; Theresa Troupson; Jason Sunshine; Summer Benson	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to provision of informed legal advice concerning evidence to be marshalled in defense of claims by Blake Lively and regarding legal ramifications of media communications, and provision of said advice.	Attorney-Client Communication; Work Product; Common Interest
311				This document will be produced by December 8, 2025.	

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
312	2/4/2025 1:56 PM	Breanna Butler Koslow; Jason Sunshine; Jed Wallace	Spencer Freedman; Jennifer Abel; Bryan Freedman; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Melissa Nathan; Jason Sunshine; Carolina Hurley; Jared Freedman; Miles Cooley; Katie Case	Attorney-client communication seeking legal advice regarding public statement by Blake Lively in light of court order.	Attorney-Client Communication; Work Product; Common Interest
313				This document will be produced by December 8, 2025.	
314	2/5/2025 1:03 AM	Jamey Heath; Jed Wallace; Justin Baldoni; Melissa Nathan; Mitz Toskovic; Steve Sarowitz; Jennifer Abel; Tera Hanks; Mitra Ahouraian; Jason Sunshine; Ahmed Musiol	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to provision of legal advice and seeking legal advice regarding expert consultant on issues raised in cross-complaint; potential claims against third parties; action initiated in Texas; evidence gathering in support of defenses to claims by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
315	2/5/2025 1:03 AM	Ahmed Musiol	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment conveying information necessary to provision of legal advice regarding factual defenses to claims by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
316	2/5/2025 1:03 AM	Ahmed Musiol	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment conveying information necessary to provision of legal advice regarding factual defenses to claims by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
317	2/5/2025 1:03 AM	Ahmed Musiol	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment conveying information necessary to provision of legal advice regarding factual defenses to claims by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
318	2/5/2025 1:03 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment providing information to attorney to enable provision of informed legal advice with respect to legal response to allegations by Blake Lively and others.	Attorney-Client Communication; Work Product; Common Interest
319	2/5/2025 7:11 AM	Jennifer Abel; Melissa Nathan; Jason Sunshine	Jennifer Abel; Summer Benson; Melissa Nathan; Jason Sunshine	Attorney-client communication conveying information necessary to provision of legal advice and seeking legal advice regarding subpoenas to third-party witnesses.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
320	2/5/2025 12:26 PM	Melissa Nathan; Jason Sunshine	Melissa Nathan; Jason Sunshine	Attorney-client communication seeking information necessary to provision of legal advice regarding third-party witness information and contact information for cross-defendant.	Attorney-Client Communication; Work Product
321	2/6/2025 12:23 AM	Justin Baldoni; Ahmed Musiol; Melissa Nathan; Jed Wallace; Mitra Ahouraian; Jamey Heath; Steve Sarowitz; Jason Sunshine; Jennifer Abel	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication providing information necessary to provision of informed legal advice and seeking legal advice regarding potential interview with third-party witnesses; evidence gathering relating to defenses and claims in the actions; potential manipulation of damages assertions by Blake Lively.	Attorney-Client Communication; Work Product; Common Interest
322	2/8/2025 12:15 AM	Mitra Ahouraian; Bryan Freedman; Melissa Nathan; Justin Baldoni; Jennifer Abel; Jamey Heath; Jason Sunshine; Steve Sarowitz; Ahmed Musiol	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to provision of informed legal advice regarding factual defenses to claims asserted by Lively.	Attorney-Client Communication; Work Product; Common Interest
323	2/8/2025 1:03 AM	Bryan Freedman; Melissa Nathan	Bryan Freedman; Melissa Nathan	Attorney-client communication conveying legal advice regarding evidence gathered in support of response to allegations made by Blake Lively in her lawsuit.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
324	2/9/2025 12:20 AM	Ahmed Musiol; Bryan Freedman; Jamey Heath; Melissa Nathan; Mitra Ahouraian; Justin Baldoni; Jennifer Abel; Steve Sarowitz; Jason Sunshine; Summer Benson; Mitz Toskovic	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to provision of informed legal advice, and provision of legal advice, regarding factual defenses to claims asserted by Lively and service of subpoenas on third-party witnesses.	Attorney-Client Communication; Work Product; Common Interest
325	2/9/2025 2:48 AM	Justin Baldoni	Bryan Freedman; Justin Baldoni	Attorney-client communication conveying information necessary to facilitate provision of informed legal advice regarding factual defenses to claims asserted by Lively and factual foundation for allegations in cross-complaint.	Attorney-Client Communication; Work Product
326	2/9/2025 2:48 AM	Bryan Freedman; Justin Baldoni	Bryan Freedman; Justin Baldoni	Attorney-client communication attachment conveying information necessary to facilitate provision of informed legal advice regarding factual defenses to claims asserted by Lively and factual foundation for allegations in cross-complaint.	Attorney-Client Communication; Work Product
327	2/10/2025 12:54 AM	Justin Baldoni; Melissa Nathan; Jamey Heath; Summer Benson; Jason Sunshine; Jennifer Abel; Steve Sarowitz; Bryan Freedman; Jed Wallace; Tera Hanks; Mitra Ahouraian; Mitz Toskovic;	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication conveying information necessary to provision of informed legal advice, and seeking and providing legal advice, regarding subpoena to third party witness; potential third party witnesses; legal strategies and theories and evidence in support of defenses and claims in litigation.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
328	2/10/2025 12:54 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attorney-client communication attachment conveying information necessary to provision of informed legal advice, and seeking and providing legal advice, regarding subpoena to third party witness; potential third party witnesses; legal strategies and theories and evidence in support of defenses and claims in litigation.	Attorney-Client Communication; Work Product; Common Interest
329	2/10/2025 12:54 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to attorney-client communication providing information to attorney to enable provision of informed legal advice with respect to legal response to allegations by Blake Lively and others.	Attorney-Client Communication; Work Product; Common Interest
330	2/10/2025 12:54 AM	Jed Wallace	Jennifer Abel; Melissa Nathan; Bryan Freedman; Justin Baldoni; Jamey Heath; Jed Wallace; Mitra Ahouraian; Mitz Toskovic; Summer Benson; Jason Sunshine; Theresa Troupson; Spencer Freedman; Jared Freedman; Ahmed Musiol; Steve Sarowitz; Tera Hanks; Breanna Butler Koslow; Kevin Fritz	Attachment to attorney-client communication seeking legal advice regarding subpoena to third party witness; potential third party witnesses; legal strategies and theories and evidence in support of defenses and claims in litigation.	Attorney-Client Communication; Work Product; Common Interest
331	2/10/2025 1:28 PM	Jamey Heath; Bryan Freedman	Jamey Heath; Bryan Freedman	Attorney-client communication seeking and providing information regarding subpoenas to third-party witnesses.	Attorney-Client Communication; Work Product

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
332	2/11/2025 12:11 AM	Ahmed Musiol; Jed Wallace; Mitz Toskovic; Mitra Ahouraian; Jamey Heath; Justin Baldoni; Tera Hanks; Justin Baldoni; Jennifer Abel; Melissa Nathan; Steve Sarowitz; Bryan Freedman; Theresa Troupson; Summer Benson; Jason Sunshine	Steve Sarowitz; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Jared Freedman; Justin Baldoni; Ahmed Musiol	Attorney-client communication providing information necessary to provision of informed legal advice, and seeking legal advice, relating to factual bases for claims and defenses against Lively and conveying legal advice relating to court filings related to Blake Lively's time to respond to complaint.	Attorney-Client Communication; Work Product; Common Interest
333	2/11/2025 12:11 AM	Ahmed Musiol; Jed Wallace; Mitz Toskovic; Mitra Ahouraian; Jamey Heath; Mitra Ahouraian; Justin Baldoni; Tera Hanks; Jennifer Abel; Melissa Nathan; Steve Sarowitz; Bryan Freedman; Summer Benson; Jason Sunshine; Theresa Troupson	Steve Sarowitz; Ahmed Musiol; Jamey Heath; Spencer Freedman; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Jared Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Breanna Butler Koslow; Summer Benson; Kevin Fritz; Melissa Nathan; Jason Sunshine; Justin Baldoni	Attorney-client communication providing information necessary to provision of informed legal advice, and seeking legal advice, relating to factual bases for claims and defenses against Lively and conveying legal advice relating to court filings related to Blake Lively's time to respond to complaint.	Attorney-Client Communication; Work Product; Common Interest
334	2/15/2025 9:36 PM	Jamey Heath; Mitz Toskovic; Jennifer Abel; Jed Wallace	Jamey Heath; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Summer Benson; Melissa Nathan	Attorney-client communication providing information necessary to facilitate provision of informed legal advice, and seeking legal advice, relating to factual bases for claims and defenses against Lively and relating to court filings related to Blake Lively's subpoenas to third parties.	Attorney-Client Communication; Work Product; Common Interest
335	2/16/2025 1:49 AM	Spencer Freedman; Bryan Freedman; Summer Benson; Melissa Nathan;	Spencer Freedman; Bryan Freedman; Jed Wallace; Summer Benson; Melissa Nathan	Attorney-client communication seeking and providing legal advice and direction relating to collection and preservation of evidence for review and potential production.	Attorney-Client Communication; Work Product; Common Interest

#	Date and Time	Sender(s)	Recipient(s)	Description	Privilege(s) Asserted
336	2/16/2025 11:17 AM	Summer Benson; Melissa Nathan	Summer Benson; Melissa Nathan	Attorney-client communication providing information necessary to provision of informed legal advice, and seeking legal advice, relating to collection and preservation of evidence for review and potential production, legal response to forthcoming filings by Blake Lively, and efforts to contact third-party witness's attorney.	Attorney-Client Communication; Work Product; Common Interest
337	2/16/2025 1:06 PM	Jed Wallace; Mitz Toskovic; Jamey Heath; Melissa Nathan; Jennifer Abel;	Jamey Heath; Mitz Toskovic; Jennifer Abel; Theresa Troupson; Bryan Freedman; Tera Hanks; Mitra Ahouraian; Jed Wallace; Summer Benson; Melissa Nathan	Attorney-client communication providing information necessary to provision of informed legal advice, and seeking legal advice, relating to collection and preservation of evidence for review and potential production, legal response to forthcoming filings by Blake Lively, and efforts to contact third-party witness's attorney.	Attorney-Client Communication; Work Product; Common Interest