

December 8, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court for the Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

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

On behalf of Jonesworks LLC (“Jonesworks”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal those portions of Jonesworks’ Reply in Further Support of its Motion for Spoliation Sanctions that refer to or quote documents or testimony designated as confidential.

Pursuant to the Court’s December 3, 2025 Order at ECF No. 1038, Jonesworks further requests that the Court defer ruling on this motion until December 19, 2025, to allow the parties to confer and, if appropriate, seek continued sealing.

Respectfully submitted,

/s/ Kristin Tahler

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