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December 8, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 1620
New York, NY 10007

Re: Lively v. Wayfarer Studios LLC, et al., No. 1:24-cv-10049-LJL [rel. No. 1:25-cv-00449]

Dear Judge Liman:

On behalf of Plaintiff Blake Lively, we write pursuant to Rule 4.b of Attachment A to Your Honor's Individual Rules to respectfully request that the Court preliminarily seal certain portions of Ms. Lively's Reply Memorandum of Law in Further Support of Motion for Spoliation Sanctions, and Exhibits 56-60 and 63-68 to the Declaration of Esra Hudson in Further Support of Motion for Spoliation Sanctions, dated December 8, 2025, all filed contemporaneously herewith. Exhibits 56-60 and 63-68 were designated as Confidential or Attorneys' Eyes Only by the producing party. The redacted portions of Ms. Lively's Reply Memorandum of Law discuss material that has been designated Confidential or Attorneys' Eyes Only.

In accordance with Rule 4.b of Attachment A, as modified by the Court's order dated November 20, 2025 (*see* Dkt. No. 998), Ms. Lively respectfully requests that the Court not rule on this letter-motion to seal until after December 19, 2025, so that the parties and non-parties have the opportunity to meet and confer and file a motion for continued sealing if they so choose.

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Respectfully submitted,

/s/ Esra A. Hudson

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