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ELLYN S. GAROFALO

December 11, 2025

Via ECF

Hon. Lewis J. Liman  
United States District Court  
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;  
rel. *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL**

Dear Judge Liman:

On behalf of Defendants Jennifer Abel, Melissa Nathan, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, The Agency Group PR LLC, and Wayfarer Studios LLC (collectively, the “Wayfarer Parties”), we write pursuant to the Court’s Order of December 9, 2025 (Dkt. 1099) to submit documents claimed as privileged for *in camera* review.

Attached hereto as Exhibit A is a true and correct copy of the Wayfarer Parties’ Revised Supplemental Privilege Log, reflecting the challenged documents that have now been produced. The rows highlighted in gray reflect the entries challenged by Plaintiff Blake Lively in her motion to compel (Dkt. 1032).

Documents corresponding to the following entries were produced by the Wayfarer Parties on December 8, 2025: 21, 143, 160, 181, 197, 199, 200, 223, 225, 245, 249, 259, 268, 277, 291B, 291C, 297, 298, 303, 305, 311, and 313.

Documents corresponding to the following entries were produced by the Wayfarer Parties in redacted form on December 8, 2025: 225A, 267, 289, 290, 291, 302, and 303A. Copies of these documents in their redacted and unredacted forms are submitted herewith.

The following entries remain at issue: 10, 11, 13, 14, 25, 37, 42, 44, 46, 47, 52, 53, 56, 57, 63, 64, 65, 68, 69, 70, 71, 72, 75, 76, 80, 81, 82, 94, 96, 135, 136, 137, 138, 139, 140, 141, 146, 148, 149, 150, 156, 158, 179, 180, 182, 183, 184, 185, 186, 188, 189, 190, 191, 201, 211, 212, 215, 217, 218, 219, 229, 230, 231, 232, 233, 234, 235, 236, 246, 266, 272, 274, 275, 276, 278, 292, 295, 299, 301, and 304. Pursuant to the Court’s order (Dkt. 1099) and the Court’s Individual Practices ¶ 2.N, these documents are submitted under seal herewith via ECF where possible. All of the documents, including the audio and video files that cannot be submitted via ECF, are also concurrently submitted via a link provided to the Wayfarer Parties’ counsel by the Court’s chambers.

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Respectfully submitted,

/s/ Ellyn S. Garofalo

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cc: all counsel of record (via ECF)