



Kevin Fritz
Partner
Direct (212) 655-3570
kaf@msf-law.com

December 12, 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

Dear Judge Liman:

On behalf of third-party defendant Jennifer Abel, we write pursuant to Rule 4.b of Attachment A to Your Honor's Individual Rules to respectfully request that the Court preliminarily seal portions of her reply papers in further support motion for conditional summary judgment against third-party defendant Jonesworks LLC, filed contemporaneously herewith. Specifically, we request that the Court preliminarily seal Exhibit 2 to the Reply Declaration of Kevin Fritz, and the portions of the other motion papers referencing the content of that exhibit and other exhibits previously filed under seal.

All of these materials are documents, communications, or other discovery materials that have been designated as Confidential by parties or certain non-parties in the above-captioned matter.

Respectfully submitted,

/s/ Kevin Fritz
MEISTER SEELIG & FEIN PLLC
Mitchell Schuster
Kevin Fritz
125 Park Avenue, 7th Floor
New York, NY 10017
Tel: (212) 655-3500
Email: ms@msf-law.com
kaf@msf-law.com

LINER FREEDMAN TAITELMAN + COOLEY, LLP

Bryan J. Freedman (*pro hac vice*)
Ellyn S. Garofalo (*pro hac vice*)
1801 Century Park West, 5th Floor
Los Angeles, CA 90067
Tel: (310) 201-0005
Email: bfreedman@lftcllp.com
egarofalo@lftcllp.com

AHOURAIAN LAW

Mitra Ahouraian (*pro hac vice*)
2029 Century Park East
4th Floor
Los Angeles, CA 90067
(310) 376-7878
Email: mitra@ahouraianlaw.com

SHAPIRO ARATO BACH LLP

Alexandra A. E. Shapiro
Jonathan Bach
Alice Buttrick
1140 Avenue of the Americas, 17th Floor
New York, NY 10036
Tel: 212-257-4881
Email: ashapiro@shapiroarato.com
jbach@shapiroarato.com
abuttrick@shapiroarato.com

cc: all counsel of record (via ECF)