



Esra A. Hudson
Manatt, Phelps & Phillips, LLP
Direct Dial: 310-312-4381
ehudson@manatt.com

December 19, 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, and pursuant to Rule 4.b of Attachment A to Your Honors' Individual Rules and the Court's suggestion at the December 9, 2025 post-discovery conference, we write to respectfully request a brief extension of the deadlines to move for continued sealing, and to oppose continued sealing, of documents filed under seal in connection with Ms. Lively's motion for spoliation sanctions (ECF No. 862), Ms. Lively's and Mr. Reynolds' (the "Lively Parties") motions for sanctions pursuant to Rule 11 (ECF Nos. 222, 229), and Defendants' and Third-Party Plaintiffs' Motions for Summary Judgment (ECF Nos. 938, 952) (collectively, the "Motions"). Unless extended, the deadline to file motions for continued sealing is December 19, 2025, and the deadline to oppose such motions is January 9, 2025. (ECF Nos. 998, 1026).

Given the volume of evidence submitted in connection with the Motions, the Parties have met and conferred and have agreed to a streamlined process to submit sealing requests to the Court, which will enable a more efficient review and promote judicial economy. Specifically, the Parties have agreed to jointly submit a chart that will detail each proposed redaction, the proponent for that redaction, the proponent's stated basis for sealing, and whether any other party opposes the redaction and on what ground. To enable that process, the Parties have also reached a preliminary agreement to extend the schedule for briefing motions for continued sealing but have been unable to agree on an appropriate extended schedule.¹ Ms. Lively's counsel has engaged in extensive discussions with third parties to address their ongoing requests for sealing certain documents.

Ms. Lively respectfully requests that the Court extend the sealing deadlines as follows:

- December 29, 2025: Parties to exchange highlighted documents indicating their respective sealing requests.
- January 6, 2026: Parties and third parties to file opening sealing briefs.
- January 13, 2026: Opposing sealing briefs to be filed.

¹ Defendants insist that opening submissions and oppositions be filed on December 29 and January 9, respectively. The Jones Parties and third-parties Sony Pictures Entertainment ("Sony") and William Morris Endeavor Entertainment ("WME") join in Ms. Lively's request to extend the deadlines to January 6 and January 13.



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Ms. Lively submits that good cause exists to grant the requested extension. The extension will allow the Parties additional time to confer and finalize their joint submission, as well as continue discussions with third parties to reduce the number of sealing requests presented to the Court. While these efforts are already under way, the Parties – and particularly, the third parties – would benefit from additional time given the upcoming holidays and related travel obligations. The Parties have previously requested, and received, an extension of these deadlines; however, Ms. Lively submits that the proposed amended deadlines will not materially impact the case schedule. If granted, the extension would extend the opposition deadline by only two business days. The date of the Parties’ next scheduled appearance before the Court is January 22, 2026.

Respectfully submitted,

/s/ Esra A. Hudson

WILLKIE FARR & GALLAGHER LLP
Michael J. Gottlieb
2049 Century Park East
Los Angeles, California 90067
(310) 855-3000
mgottlieb@willkie.com

Kristin E. Bender
1875 K Street NW
Washington, DC 20006
(202) 303-1000
kbender@willkie.com

Aaron E. Nathan
Michaela A. Connolly
Melissa Taustine
Willkie Farr & Gallagher LLP
787 7th Avenue New York, NY 10019
(212) 728-8000
anathan@willkie.com
mconnolly@willkie.com
mtaustine@willkie.com

DUNN ISAACSON RHEE LLP
Meryl C. Governski (admitted *pro hac vice*)
401 Ninth Street, NW
Washington, DC 20004
(202) 240-2900
mgovernski@dirllp.com

MANATT, PHELPS & PHILLIPS, LLP
Esra A. Hudson (admitted *pro hac vice*)
Stephanie A. Roeser (admitted *pro hac vice*)
Sarah E. Moses (admitted *pro hac vice*)
2049 Century Park East, Suite 1700
Los Angeles, CA 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com
smoses@manatt.com

Matthew F. Bruno
7 Times Sq.
New York, NY 10036
(212) 790-4500
mbruno@manatt.com

Attorneys for Blake Lively