

WILLKIE FARR & GALLAGHER^{LLP}

2029 Century Park East
Los Angeles, CA 90067-2905
Tel: 310 855 3000
Fax: 310 855 3099

December 19, 2025

VIA ECF

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

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

Dear Judge Liman:

On behalf of Plaintiff Blake Lively, we write pursuant to Rule 4.b of Attachment A of the Court's Individual Rules to respectfully request that the Court preliminarily seal portions of Ms. Lively's letter-motion to compel a supplemental deposition of Nicole Alexander and for sanctions, as well as Exhibits 1–3 and 5 filed contemporaneously herewith. Pursuant to this Court's Protective Order, which dictates that "[d]uring the 30-day period following the conclusion of a deposition, the entire deposition transcript will be treated as if it had been designated Confidential or Attorneys' Eyes Only," the Parties (defined below) are currently obliged to treat Exhibits 1, 2 and 5 as "Confidential" or "Attorneys' Eyes Only." Dkt. No. 125 at 4. The redacted portions of Exhibit 3 refer to deposition testimony that was designated as Attorneys' Eyes Only pursuant to the Protective Order.

In accordance with Rule 4.b of Attachment A and the Court's Order (Dkt. No. 998), Ms. Lively respectfully requests that the Court not rule on this letter-motion to seal for one week, so that Ms. Lively and the Wayfarer Defendants¹ (cumulatively, the "Parties") have the opportunity to meet and confer, and the Parties and/or any third parties may file a motion for continued sealing if they so choose.

¹ The "Wayfarer Defendants" shall refer to Justin Baldoni, Jamey Heath, Wayfarer Studios LLC, It Ends With Us Movie LLC, Steve Sarowitz, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel.

Respectfully submitted,

/s/ Michael J. Gottlieb

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

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

Attorneys for Blake Lively

WILLKIE FARR & GALLAGHER LLP
Michael J. Gottlieb
Kristin E. Bender
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com

Aaron E. Nathan
Michaela A. Connolly
787 7th Avenue
New York, NY 10019
(212) 728-8000
anathan@willkie.com
mconnolly@willkie.com