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December 20, 2025

VIA ECF

Hon. 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.*, Case No. 1:24-cv-10049-LJL

Dear Judge Liman:

Plaintiff Blake Lively respectfully submits this notice to correct Ms. Lively's letter-motion to seal, filed December 19, 2025 (Dkt. No. 1131), and to provide the Court with an unredacted copy of Exhibit 2 to Ms. Lively's letter-motion to compel and for sanctions ("Exhibit 2"; Dkt. No. 1132-2). The letter-motion to seal requests that the Court preliminarily seal Exhibit 2. Exhibit 2 is an excerpt of the Court's December 15, 2025 public proceedings concerning the deposition of one of the Wayfarer Defendants'¹ designated experts, Nicole Alexander, which was inadvertently filed under seal. An unredacted copy of Exhibit 2 is attached hereto as Exhibit A.

Respectfully submitted,

/s/ Michael J. Gottlieb

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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.

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