

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

Civ. Action No. 1:24-cv-10049-LJL
(Consolidated for pretrial purposes with
1:25-cv-00449-LJL)

rel. 1:25-cv-00449-LJL

JOINT STIPULATION AND PROPOSED ORDER REGARDING THIRD-PARTY CLAIMS

WHEREAS, on December 31, 2024, Blake Lively (“Lively”) commenced this action by filing a complaint that named Jennifer Abel (“Abel”) as a defendant. ECF No. 1;

WHEREAS, on July 30, 2025, Lively filed a second amended complaint, again naming Abel as a defendant. ECF No. 520;

WHEREAS, on August 13, 2025, Abel answered the second amended complaint and filed an amended third-party complaint (the “Third-Party Complaint”) against Jonesworks LLC (“Jonesworks”) as a third-party defendant. ECF No. 639;

WHEREAS, the Third-Party Complaint asserts claims for statutory indemnification pursuant to California Labor Code Section 2802, common law indemnification, and contribution against Jonesworks (together, the “Third-Party Claims”). ECF No. 639;

WHEREAS, on October 23, 2025, Jonesworks answered the Third-Party Claims and denied that Abel is entitled to indemnification or contribution. ECF No. 877;

WHEREAS, on November 11, 2025, Abel moved for conditional summary judgment on her claim for common law indemnification against Jonesworks, ECF No. 938, and, on November 12, 2025, Abel moved for summary judgment on Lively’s claims against Abel, ECF No. 952;

WHEREAS, on December 3, 2025, Lively and Jonesworks each opposed Abel’s motions for summary judgment. ECF Nos. 1058 (Jonesworks), 1064 (Lively);

WHEREAS, on December 9, 2025, the Court scheduled oral argument on the motion for summary judgment on Lively’s claims for January 22, 2026;

WHEREAS, the parties agree that, if Lively's claims against Abel and the Third-Party Claims proceed to trial, the Third-Party Claims should be bifurcated and tried separately from Lively's claims against Abel;

WHEREAS, the parties agree that judicial economy would be served by bifurcating the Third-Party Claims, and that trying the Third-Party Claims together with Lively's claims against Abel may prejudice the parties and risk confusing the jury; and

WHEREAS, the parties request clarification regarding whether the Court intends to hold oral argument on both Abel's motion for summary judgment as to Lively and Abel's motion for summary judgment as to Jonesworks on January 22, 2026.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the parties through their undersigned counsel, that:

1. The Third-Party Claims shall be bifurcated and tried separately from Lively's claims against Abel;
2. Abel and Jonesworks request that Abel's motion for summary judgment is decided sufficiently in advance of the trial on the Third-Party Claims; and
3. The Court will hold oral argument on the following summary judgment motions on January 22, 2026 (the parties respectfully request the Court to select one option):
 - Abel's motion for summary judgment as to Lively; or
 - Abel's motions for summary judgment as to Lively and Jonesworks.

Respectfully submitted,

Dated: December 23, 2025

LINER FREEDMAN TAITELMAN +
COOLEY, LLP
Bryan J. Freedman (admitted *pro hac vice*)
Ellyn S. Garofalo (admitted *pro hac vice*)
Kim S. Zeldin (admitted *pro hac vice*)
1801 Century Park West, 5th Floor
Los Angeles, CA 90067
(310) 201-0005
bfreedman@lftcllp.com
egarofalo@lftcllp.com
kzeldin@lftcllp.com

MEISTER SEELIG & FEIN PLLC

/s/ Kevin Fritz

Mitchell Schuster
Kevin Fritz
125 Park Avenue, 7th Floor
New York, NY 10017
(202) 655-3500
ms@msf-law.com
kaf@msf-law.com

AHOURAIAN LAW

Mitra Ahouraian (admitted *pro hac vice*)
2029 Century Park East, 4th Floor
Los Angeles, CA 90076
(310) 376-7878
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
ashapiro@shapiroarato.com
jbach@shapiroarato.com
abuttrick@shapiroarato.com
*Attorneys for Defendant and Third-Party
Plaintiff Jennifer Abel*

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Kristin Tahler

Kristin Tahler
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
(213) 443-3000
kristintahler@quinnemanuel.com

Maaren A. Shah
Morgan L. Anastasio
295 5th Avenue
New York, New York 10016
(212) 849-7000
maarenschah@quinnemanuel.com
morgananastasio@quinnemanuel.com

Nicholas Inns (admitted *pro hac vice*)
1300 I Street NW
Suite 900
Washington, D.C. 20005
(202) 538-8000
nicholasinns@quinnemanuel.com

*Attorneys for Third-Party Defendant
Jonesworks LLC*

SO ORDERED:

U.S.D.C.