

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

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN  
BALDONI, JAMEY HEATH, STEVE  
SAROWITZ, IT ENDS WITH US MOVIE LLC,  
MELISSA NATHAN, THE AGENCY GROUP PR  
LLC, JENNIFER ABEL, JED WALLACE, and  
STREET RELATIONS INC.,

Defendants.

JENNIFER ABEL,

Third-Party Plaintiff,

-v-

JONESWORKS LLC,

Third-Party Defendant.

Case No. 1:24-cv-10049-LJL  
(consolidated with 1:25-cv-00449-LJL)

**DECLARATION OF KEVIN FRITZ**

I, Kevin Fritz, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Meister Seelig and Fein PLLC, 125 Park Avenue, 7<sup>th</sup> Floor, New York, NY 10017, and counsel of record for defendants Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”) in the above-captioned action.

2. I respectfully submit this declaration in opposition to Blake Lively’s motion for sanctions and related relief in connection with the deposition of Nicole M. Alexander.

3. Ms. Alexander is an expert in digital ecosystems, AI-mediated brand perception, and online reputation measurement. She was retained by the Wayfarer Parties to rebut certain expert reports concerning whether the social media activity regarding Ms. Lively during August 2024 through February 2025 was caused by a coordinated, negative manipulation campaign (as Ms. Lively alleges) or was the result of organic public engagement and entertainment industry media cycles.

4. A true copy of the transcript of the deposition of Ms. Alexander, taken on December 15, 2025, is attached as Exhibit 1.<sup>1</sup>

5. True copies of excerpts from the deposition of Jenny Slate, taken on September 26, 2025, are attached as Exhibit 2.

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<sup>1</sup> The specifics of an illness suffered by Ms. Alexander have been redacted.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: December 23, 2025  
New York, NY

/s/ Kevin Fritz  
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