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January 5, 2026

VIA ECF

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

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

Dear Judge Liman:

On behalf of Plaintiff Blake Lively, we write pursuant to Attachment A to the Court's Individual Rules to respectfully request that the Court temporarily seal Exhibits A–D to Ms. Lively's letter-motion for continued sealing of limited materials filed under seal in connection with Ms. Lively's and Ryan Reynolds's motions for sanctions pursuant to Rule 11, the Wayfarer Defendants' Motion for Summary Judgment (the "MSJ"), and Ms. Lively's opposition to the MSJ (the "Motion"), pending the Court's ruling on the Motion. Exhibits A–C contain Ms. Lively's proposed redactions to documents that are currently temporarily sealed in this action. Exhibit D is a corrected copy of Pl. MSJ Ex. 285 (Dkt. No. 1071-135), designated "Confidential" in this action.

In addition, Ms. Lively respectfully requests that the Court permanently seal portions of the declaration of Kristin E. Bender in support of the Motion, which implicate privacy interests of third parties that are appropriately sealed for the same reasons discussed in the Motion.

Respectfully submitted,

/s/ Michael J. Gottlieb

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