

F3512 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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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, and JENNIFER ABEL,

Defendants.

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JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

**DEFENDANTS' OPPOSITION TO PLAINTIFF BLAKE LIVELY'S
MOTION FOR SPOILATION SANCTIONS**

mark. Garofalo Decl. Ex. 15 (BL-000019455); Ex. 16 (SPE_WF0000641); Ex. 17 (SPE_BL0022958); Ex. 18 (Baldoni Dep. 10/7/25 at 328:9-17); Ex. 19 (Greenberg Dep. at 138:2-19). [REDACTED]

[REDACTED] Garofalo Decl. Ex. 13 (BL-000018396). Lively accomplished her takeover through threats that if her demands were not met, she would not participate in marketing the Film, even though she was contractually obligated to do so. Garofalo Decl. Ex. 20 (BALDONI_000018831). A Sony executive aptly characterized Lively as a “terrorist.” Garofalo Decl. Ex. 21 (SPE_WF0000415 at -16).

Not content with usurping Baldoni’s role as director and excluding him from the marketing of the Film he developed, financed, directed and starred in, Lively then sidelined – indeed banished – Baldoni from the premiere, refusing to be photographed with him, and demanding that he and his guests be hidden from sight and shunning Baldoni and his guests into another screening room. Garofalo Decl. Ex. 22 (WME_00001254) [REDACTED]

[REDACTED]; Ex. 23 (WME_00001266); Ex. 24 (Heath Dep. 10/9/25 at 96:18-21); Ex. 25 (Sarowitz Dep. at 140:11-13); Ex. 26 (WAYFARER_000141754); Ex. 27 (WAYFARER_000141765). Baldoni was also barred from appearing with Lively in publicity photos or promotional appearances. Lively very publicly “unfollowed” Baldoni on social media [REDACTED]

[REDACTED]. Dkt. 520 at 186 n.26; Garofalo Decl. Ex. 28 (Hoover Dep. at 197:8-12); Ex. 29 (BL-000020979 at -80).

D. The Public Relations Response to Lively’s Attacks and the Surging Chatter Over Discord on the Film’s Set.

By the time of the Film’s August 6, 2024 premiere, rumors of discord on the Film’s set were already swirling on social media and in the press. Dkt. 520, ¶ 237 n.36. These rumors were