

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

No. 24-cv-10049 (LJL) (lead case)

ORAL ARGUMENT REQUESTED

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

No. 25-cv-449 (LJL) (member case)

**NOTICE OF BLAKE LIVELY'S MOTION FOR RULE 11 SANCTIONS AGAINST
PLAINTIFFS STEVE SAROWITZ, JAMEY HEATH, MELISSA NATHAN, JENNIFER
ABEL, IT ENDS WITH US MOVIE LLC, AND THEIR COUNSEL**

PLEASE TAKE NOTICE that, for the reasons stated in the accompanying Memorandum of Law in Support of Blake Lively's Motion for Rule 11 Sanctions Against Plaintiffs Steve Sarowitz, Jamey Heath, Melissa Nathan, Jennifer Abel, It Ends With Us Movie LLC, (together, the "Rule 11 Plaintiffs") and Their Counsel ("Motion"), and the accompanying Declaration of Esra A. Hudson, the undersigned will move this Court, before Judge Lewis J. Liman, at the United States Courthouse for the Southern District of New York, located at 500 Pearl St., New York, NY 10007, on a date and time to be set by the Court, for an order, under Federal Rule of Civil Procedure 11, imposing sanctions against the Rule 11 Plaintiffs and their counsel Bryan Freedman and Mitchell Schuster ("Plaintiffs' Counsel"), and Plaintiffs' Counsel's respective law firms Liner Freedman Taitelman + Cooley LLP and Meister Seelig & Fein PLLC. The Motion seeks sanctions

in the form of attorneys' fees and costs that Ms. Lively incurred in defending against the Rule 11 Plaintiffs' baseless claims, a formal reprimand, and any sanctions that the Court deems just and proper.

Dated: May 19, 2025

/s/ Esra A. Hudson

MANATT, PHELPS & PHILLIPS, LLP
Esra A. Hudson (admitted *pro hac vice*)
Stephanie A. Roeser (admitted *pro hac vice*)
2049 Century Park East, Suite 1700
Los Angeles, California 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com

Matthew F. Bruno
Manatt, Phelps & Phillips, LLP
7 Times Sq
New York, NY 10036
(212) 790-4500
mbruno@manatt.com

WILLKIE FARR & GALLAGHER LLP
Michael J. Gottlieb
Kristin E. Bender
Meryl Governski (admitted *pro hac vice*)
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com
mgovernski@willkie.com

Aaron Nathan
Willkie Farr & Gallagher LLP
787 7th Avenue
New York, NY 10019
(212) 728-8000
anathan@willkie.com

Counsel for Blake Lively