

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 RYAN REYNOLDS'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 Ryan Reynolds'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 Michael J. Gottlieb, 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 Mr. Reynolds 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 20, 2025

/s/ Michael J. Gottlieb

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