

**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  
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

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

*Counsel for Ryan Reynolds*