

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al,

Defendants.

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, et al.,

Consolidated Plaintiffs,

v.

BLAKE LIVELY, et al.

Consolidated Defendants.

**NOTICE OF BLAKE LIVELY'S MOTION FOR ATTORNEYS' FEES, TREBLE  
DAMAGES, AND PUNITIVE DAMAGES UNDER CALIFORNIA CIVIL CODE  
SECTION 47.1**

PLEASE TAKE NOTICE that, for the reasons stated in the accompanying Memorandum of Law in Support of Blake Lively's Motion for Attorneys' Fees, Treble Damages, and Punitive Damages under California Civil Code Section 47.1, and the accompanying Declarations of Esra Hudson and Claire Ayoub, with the exhibits attached thereto, 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, pursuant to California Civil Code Section 47.1, ruling that she is a “prevailing defendant” under Section 47.1 and, as such, that she is entitled to (i) attorneys’ fees and costs for successfully defending herself in the litigation; (ii) treble damages for the harm caused by 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 (collectively, the “Wayfarer Parties”) in bringing their retaliatory “defamatory action” against her; and (iii) punitive damages sufficient to deter the Wayfarer Parties from engaging in such conduct in the future. For these reasons, and those set forth in more detail in the accompanying memorandum of law, the Court should grant Ms. Lively’s motion in its entirety.

Dated: September 8, 2025

/s/ Esra A. Hudson

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