UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WAYFARER STUDIOS LLC, JUSTIN BALDONI, JAMEY HEATH, IT ENDS WITH US MOVIE LLC, MELISSA NATHAN, JENNIFER ABEL, and STEVE SAROWITZ, Plaintiffs, -v- BLAKE LIVELY, RYAN REYNOLDS, LESLIE SLOANE, VISION PR, INC., and THE NEW YORK TIMES COMPANY, Defendants.	Case No. 1:25-cv-00449 (LJL)

DECLARATION OF CLAIRE AYOUB

I, Claire Ayoub, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration. The evidence set out in the foregoing declaration is based on my personal knowledge.

2. I wrote and directed a film called *Empire Waist*, which was produced by Wayfarer Studios LLC. Justin Baldoni, a founder of Wayfarer, was a producer. As part of my work on *Empire Waist*, I had repeated, negative interactions with Mr. Baldoni and his associates, including verbal abuse by Mr. Baldoni. I asked Wayfarer that Mr. Baldoni not be permitted on set during the majority of production as a result of those experiences.

3. *Empire Waist* was set to be released in the fall of 2024. In August of that year, as a result of my experiences with Mr. Baldoni and ongoing press coverage relating to Mr. Baldoni and *It Ends With Us*, I requested that he not be involved in *Empire Waist*'s marketing or public relations efforts. Wayfarer agreed to my request.

4. Less than a week after reaching that agreement, I was contacted by the assistant to Steve Sarowitz (the co-founder and co-chairman of Wayfarer) to schedule a time for me and Mr. Sarowitz to speak.

5. Mr. Sarowitz's assistant did not identify a topic for the meeting. I feared that Mr. Sarowitz wanted to discuss my recent request relating to Mr. Baldoni. Worried that Mr. Sarowitz might pressure me to abandon the prior agreement that I had reached with Wayfarer, I recorded our meeting.

6. A true and correct copy of that recording, produced in discovery as BL-000033428, is being submitted with this declaration as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New Canaan, Connecticut
September 4, 2025

Claire Ayoub
Claire Ayoub (Sep 3, 2025 20:26:47 EDT)
Claire Ayoub