

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

Civ. Action No. 1:24-cv-10049-LJL  
(Consolidated for pretrial purposes with  
1:25-cv-00449-LJL)

rel. 1:25-cv-00449-LJL

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

**THIRD-PARTY DEFENDANT JONESWORKS LLC'S NOTICE OF MOTION FOR  
SPOILATION SANCTIONS**

Please take notice that, third-party defendant Jonesworks LLC (“Jonesworks”), by and through its undersigned counsel, will move this Court before the Honorable Lewis L. Liman at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order pursuant to Federal Rule of Civil Procedure 37(e) imposing spoliation sanctions on Third-Party Plaintiff Jennifer Abel (“Abel”), including at minimum (1) an adverse inference that the Signal messages Abel destroyed would have been favorable to Jonesworks and unfavorable to Abel and demonstrated that the Defendants in the above-captioned action, including Abel, conducted a retaliatory smear campaign without Stephanie Jones’s or Jonesworks’ knowledge, involvement, or approval, and that Abel’s participation in that campaign while a Jonesworks employee (a) was for her own personal benefit, (b) was not in furtherance of and was outside the course and scope of her employment, and not in discharge of her duties and (c) was not at Jones’s or Jonesworks’ direction; (2) preclusion of Abel from arguing otherwise; (3) monetary sanctions for the costs and prejudice caused by her spoliation; and (4) any other relief the Court deems proper.

In support of this motion, Jonesworks respectfully submits the accompanying Memorandum of Law and Declaration of Kristin Tahler, as well as attached exhibits, and relies on all prior pleadings and proceedings in this action.

DATED: October 22, 2025

**QUINN EMANUEL URQUHART &  
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