Case 1:24-cv-10049-LJL Document 89-1 Filed 02/20/25 Page 1 of 3

Exhibit A

From: Kevin A. Fritz

Bender, Kristin; Christina Puello; Jason Sunshine; Mitch Schuster; Amit Shertzer; Theresa Troupson; Bryan To:

Freedman; Summer Benson; Sigrid McCawley; Andrew Villacastin; Lindsey Ruff; katebolger@dwt.com;

kristintahler ; maarenshah ; nicholasinns Gottlieb, Michael; Hudson, Esra; Roeser, Stephanie; Governski, Meryl Conant; Nathan, Aaron E. Cc:

Subject: RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No.

1:25-cv-00449-LJL

Date: Tuesday, February 18, 2025 9:26:49 AM

Attachments: image001.png

*** EXTERNAL EMAIL ***

Kristin:

With respect to the Lively parties' request for a protective order, the Wayfarer parties are amenable to the Court's model protective order, without the Lively parties' proposed changes thereto.



Kevin A. Fritz

Partner

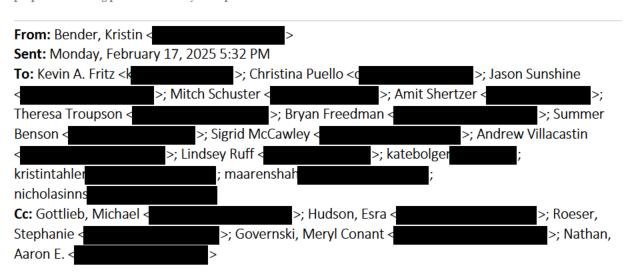
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CAUTION: This is an external email. DO NOT click links or open attachments unless you can confirm the sender and know the content is safe.

All,

I hope you had a restful holiday weekend. I am re-sending the draft protective order to include newly noticed counsel and counsel for the related case.

As discussed during the meet and confer last week, the Lively/Reynolds parties have proposed the attached protective order for the consolidated cases. We understand from last week's correspondence and discussion that the Vision/Sloane parties agree to this draft, and that the Wayfarer defendants do not intend to seek any protective order. Will counsel for the Wayfarer defendants please confirm that you do not intend to seek a protective order?

Additionally, at the parties' February 3 conference with the Court, Judge Liman had inquired as to whether the protective order will also expand to cover the related parties. Will counsel for the parties in *Jones v. Abel* please indicate whether you intend to seek a similar protective order?

Please advise of your positions by 12 pm est tomorrow. In light of the upcoming disclosures, we believe it is important to seek a protective order promptly and plan to file with the Court early this week.

Best, Kristin

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