

Exhibit A

From: [Kevin A. Fritz](#)
To: [Bender, Kristin](#); [Christina Puello](#); [Jason Sunshine](#); [Mitch Schuster](#); [Amit Shertzer](#); [Theresa Troupson](#); [Bryan Freedman](#); [Summer Benson](#); [Sigrid McCawley](#); [Andrew Villacastin](#); [Lindsey Ruff](#); [katebolger@dwt.com](#); [kristintahle](#); [REDACTED]; [maarensah](#); [REDACTED]; [nicholasinns](#); [REDACTED]
Cc: [Gottlieb, Michael](#); [Hudson, Esra](#); [Roeser, Stephanie](#); [Governski, Meryl Conant](#); [Nathan, Aaron E.](#)
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

125 Park Avenue | 7th Floor | New York, NY | 10017



[New York](#) | [New Jersey](#) | [Connecticut](#) | [California](#) | [Website](#)

IMPORTANT NOTICES: NOTICE UNDER E-SIGN ACT: Unless specifically set forth herein, the transmission of this communication is not intended to be a legally binding electronic signature, and no offer, commitment or assent on behalf of the sender or its client is expressed or implied by the sending of this facsimile, or any attachments hereto.

NOTICE OF ATTORNEY'S CONFIDENTIALITY: The material submitted herewith contains, and is intended to be a confidential transmission of information or documents from MEISTER SEELIG & FEIN PLLC which is legally privileged. The materials or information enclosed are intended only for the use of the individual or entity named in this transmission sheet. If you are not the intended recipient, any disclosure, copying, distribution or the taking of any action in reliance on the contents of this transmission is strictly prohibited. If you have received this telecopy transmission in error, please notify us by telephone immediately, so that we can arrange for the return of the original documents to us at our cost.

IRS CIRCULAR 230 DISCLOSURE: As required by U.S. Treasury Regulations governing tax practice, you are hereby advised that any written tax advice contained herein was not written or intended to be used (and cannot be used) by any taxpayer for the purpose of avoiding penalties that may be imposed under the U.S. Internal Revenue Code.

From: Bender, Kristin <[REDACTED]>
Sent: Monday, February 17, 2025 5:32 PM
To: Kevin A. Fritz <[REDACTED]>; Christina Puello <[REDACTED]>; Jason Sunshine <[REDACTED]>; Mitch Schuster <[REDACTED]>; Amit Shertzer <[REDACTED]>; Theresa Troupson <[REDACTED]>; Bryan Freedman <[REDACTED]>; Summer Benson <[REDACTED]>; Sigrid McCawley <[REDACTED]>; Andrew Villacastin <[REDACTED]>; Lindsey Ruff <[REDACTED]>; katebolger <[REDACTED]>; kristintahle <[REDACTED]>; maarensah <[REDACTED]>; nicholasinns <[REDACTED]>
Cc: Gottlieb, Michael <[REDACTED]>; Hudson, Esra <[REDACTED]>; Roeser, Stephanie <[REDACTED]>; Governski, Meryl Conant <[REDACTED]>; Nathan, Aaron E. <[REDACTED]>

Subject: 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

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

Kristin Bender
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238

 | [vCard](#) | www.willkie.com/bio

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.