

# GIBSON DUNN

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VIA ECF

The Honorable Lewis J. Liman  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 1620  
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC, et al.*, No. 1:24-cv-10049-LJL

Dear Judge Liman:

We write on behalf of non-party, Sony Pictures Entertainment (“SPE”), to request an extension of time to file a motion to seal portions of deposition testimony and confidential documents produced by SPE and designated Attorneys Eyes Only (“AEO”), which Defendant Wayfarer Studios filed in connection with its Motion for Summary Judgment. On November 18, 2025, counsel for Defendant Wayfarer Studios informed SPE it had filed 26 documents produced by SPE and 34 pages of deposition testimony of an SPE witness as exhibits to its Motion for Summary Judgment. All of the documents and testimony were designated Confidential and four documents were designated AEO. Wayfarer’s counsel informed SPE the information had been conditionally filed under seal, and the deadline for SPE to request that the documents be permanently sealed is November 26. On November 19, SPE wrote to counsel for Wayfarer to inform counsel that SPE required additional time to review the documents and testimony, meet and confer with counsel for Wayfarer, and evaluate whether it was necessary to file a motion requesting that confidential and AEO information be permanently sealed. Having received no response from Wayfarer’s counsel and given the impending deadline, we write on behalf of SPE to request such an extension from the Court. We understand that Plaintiff has sought an extension until December 8, 2025 to request that the Court permanently seal information filed in connection with Wayfarer’s Motion for Summary Judgment. SPE respectfully requests the same or a similar extension of time.

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Ilissa Samplin

*Attorneys for Non-Party SPE*