

Exhibit A

From: Gottlieb, Michael
Sent: Sunday, January 19, 2025 1:20 PM
To: bfreedman@lftcllp.com; cpuello@lftcllp.com; sliner@lftcllp.com
Cc: Hudson, Esra; Bender, Kristin; Roeser, Stephanie
Subject: RE: Wayfarer v. Lively et al
Attachments: Waiver of Service - Lively.pdf; Waiver of Service - Ryenolds.pdf; FW: Lively v. Wayfarer Studios et al (SDNY)

Dear Mr. Freedman,

I am following up on my email of last night, which like the emails from December and January it references, you have not responded to by email or phone. As you likely know, last night there was an incident where one of your process servers followed a young female employee of our clients, late at night, to the home in which that employee was staying. She was sufficiently disturbed by the conduct that she filed a police report. To avoid further wasting your clients' resources, incidents involving third parties, and trespassing on private property, I reiterate that our clients have waived service, and attach waivers regarding the same.

As you know, Rule 4(d)(1) of the Federal Rules of Civil Procedure provides that any "individual, corporation, or association that is subject to service under Rule 4(e), (f), or (h) has a duty to avoid unnecessary expenses of serving the summons." We asked you to comply with that obligation back in December when Ms. Lively filed her complaint, and again in January, and each time you refused even to respond, instead forcing us to go to the time and expense of serving all of your clients (after which you appear to have taken the position that our clients were at fault for attempting to effectuate personal service, even though you could have avoided all of that by simply complying with your obligations under Rule 4). Last night, to comply with the letter of Rule 4, we reached out to inform you that there was no need to incur unnecessary expenses of serving our clients in person, and offered to accept service by email. We have now attached signed and executed waivers confirming the same.

Please respond in writing **today** with a copy of the complaint so that we may have a complete record of service that can be presented to the Court. If you decline to do so, please explain in writing why you are insisting upon incurring the "unnecessary expenses" of personal service rather than following the process contemplated by Rule 4.

Respectfully,

Michael Gottlieb
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238
Direct: [+1 202 303 1442](tel:+12023031442) | Fax: +1 202 303 2000
mgottlieb@willkie.com | [vCard](tel:+12023031442) | [www.willkie.com bio](http://www.willkie.com/bio)

From: Gottlieb, Michael <MGottlieb@willkie.com>
Sent: Saturday, January 18, 2025 9:16 PM
To: bfreedman@lftcllp.com; cpuello@lftcllp.com
Cc: Hudson, Esra <EHudson@manatt.com>; Bender, Kristin <KBender@willkie.com>; Roeser, Stephanie

<SRoeser@manatt.com>

Subject: Wayfarer v. Lively et al

Mr. Freedman,

As I am sure you will recall, we reached out to you to ask whether you would accept service on behalf of your clients when Ms. Lively filed her lawsuit against your clients in the Southern District of New York. We made that request because we generally find it less invasive, and far more efficient for all parties, to effectuate service in a collegial manner. Unfortunately, you did not respond to that request, or agree to accept service on behalf of any of your clients in response to our request.

By this email, I am notifying you that you may serve your clients' complaints against Ms. Lively and Mr. Reynolds by email to me or my colleagues. Our clients have authorized us to accept service on their behalf. If you would like to send us the complaint, we will send you a waiver of service form for your records. There is no reason to waste any more of your clients' resources, or needlessly frighten uninvolved third parties with process servers.

Respectfully,

Mike

—
Michael Gottlieb
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238
Direct: [+1 202 303 1442](tel:+12023031442) | Fax: +1 202 303 2000
mgottlieb@willkie.com | <vCard> | www.willkie.com [bio](#)

AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Southern District of New York

Wayfarer Studios LLC, et al.)	Civil Action No. 1:25-cv-00449
<i>Plaintiff</i>)	
v.)	
Blake Lively, Ryan Reynolds, et al.)	
<i>Defendant</i>)	

WAIVER OF THE SERVICE OF SUMMONS

To: Bryan Freedman
(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 01/19/2025, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: 01/19/2025

/s/ Michael J. Gottlieb
Signature of the attorney or unrepresented party

Blake Lively
Printed name of party waiving service of summons

Michael J. Gottlieb
Printed name
Willkie Farr & Gallagher LLP
1875 K Street, N.W.
Washington, DC 20006-1238
Address

mgottlieb@willkie.com
E-mail address

(202) 303-1000
Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

AO 399 (01/09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Southern District of New York

Wayfarer Studios LLC, et al.)	Civil Action No. 1:25-cv-00449
<i>Plaintiff</i>)	
v.)	
Blake Lively, Ryan Reynolds, et al.)	
<i>Defendant</i>)	

WAIVER OF THE SERVICE OF SUMMONS

To: Bryan Freedman
(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from 01/19/2025, the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: 01/19/2025

/s/ Michael J. Gottlieb
Signature of the attorney or unrepresented party

Ryan Reynolds
Printed name of party waiving service of summons

Michael J. Gottlieb
Printed name
Willkie Farr & Gallagher LLP
1875 K Street, N.W.
Washington, DC 20006-1238
Address

mgottlieb@willkie.com
E-mail address

(202) 303-1000
Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

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"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

From: Bender, Kristin
Sent: Tuesday, January 7, 2025 8:03 PM
To: bfreedman@lftcllp.com
Cc: Gottlieb, Michael; Hudson, Esra; Roeser, Stephanie
Subject: FW: Lively v. Wayfarer Studios et al (SDNY)
Attachments: 1-24-cv-10049.zip

Mr. Freedman,

Service has been effectuated on Wayfarer Studios LLC, It Ends With Us Movie LLC, and The Agency Group PR LLC. Service of process as to the remainder of the defendants is underway. Please advise if you will accept service on behalf of the remaining defendants – Justin Baldoni, Jamey Heath, Steve Sarowitz, Melissa Nathan, and Jennifer Abel.

Regards,
Kristin

Kristin Bender
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)
kbender@willkie.com | <vCard> | [www.willkie.com bio](http://www.willkie.com/bio)

From: Gottlieb, Michael <MGottlieb@willkie.com>
Sent: Tuesday, December 31, 2024 6:50 PM
To: BFreedman@lftcllp.com
Cc: Hudson, Esra <EHudson@manatt.com>; Bender, Kristin <KBender@willkie.com>; Stephanie Roeser <SRoeser@manatt.com>
Subject: Lively v. Wayfarer Studios et al (SDNY)

Mr. Freedman,

I attach a federal court complaint filed earlier today in the Southern District of New York against Wayfarer Studios, LLC and others, as listed on the caption. Please let us know if you will represent Wayfarer or any of the other listed parties in this action, and, if so, whether you will accept service on their behalf.

Respectfully,

Mike Gottlieb

Michael Gottlieb
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238
Direct: [+1 202 303 1442](tel:+12023031442) | Fax: +1 202 303 2000
mgottlieb@willkie.com | <vCard> | [www.willkie.com bio](http://www.willkie.com/bio)