

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

Stephanie Jones, Jonesworks LLC,

Plaintiffs,

-against-

Jennifer Abel, Melissa Nathan, Justin
Baldoni, Wayfarer Studios LLC, and John
Does 1-10

Defendants.

Civil Action No. 1:25-cv-779

**DECLARATION OF KRISTIN N. TAHLER IN SUPPORT OF STEPHANIE JONES
AND JONESWORKS LLC'S REPLY IN FURTHER SUPPORT OF THEIR MOTION
FOR LEAVE TO AMEND THEIR COMPLAINT**

I, Kristin N. Tahler, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Quinn Emanuel Urquhart and Sullivan LLP, 865 South Figueroa Street 10th Floor, Los Angeles, CA, 90017, and counsel of record for Stephanie Jones and Jonesworks LLC ("Jonesworks" and with Jones the "Jones Parties") in the above-captioned action.

2. I respectfully submit this declaration in support of the Jones Parties' Reply in Further Support of Their Motion for Leave to Amend Their Complaint.

3. Attached as **Exhibit 1** is a true and correct copy of Defendant Melissa Nathan's Supplemental Responses and Objections to Plaintiffs Stephanie Jones and Jonesworks LLC's First Set of Interrogatories, dated July 30, 2025.

4. Attached as **Exhibit 2** is a true and correct copy Defendants' First Request for the Production of Documents and Things to Plaintiff Stephanie Jones, dated March 12, 2025.

5. The Jones Parties served numerous subpoenas and discovery requests seeking information regarding the Websites, including the creator or creators of the Websites, and *Business*

Insider article before May 2025, included but not limited to the following:

- a. The Jones Parties served a subpoena duces tecum dated January 10, 2025, on Namecheap, Inc., seeking documents relating to www.stephaniejonesleaks.com;
- b. The Jones Parties served a subpoena duces tecum dated January 10, 2025, on Hostinger International Ltd., seeking documents relating to www.stephaniejoneslies.com; and
- c. The Jones Parties served a subpoena duces tecum dated March 7, 2025, on Meta Platforms, Inc., seeking documents relating to the Facebook account at <https://www.facebook.com/people/Stephanie-Jones/61559205100286/>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: January 22, 2026
Los Angeles, California

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

By : /s/ Kristin N. Tahler

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