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February 17, 2026

Via ECF

Hon. Lewis J. Liman
United States District Court
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Jones et al. v. Abel et. al.*, No. 1:25-cv-00779-LJL

Dear Judge Liman:

Pursuant to Section 1.D of Your Honor's Individual Practices in Civil Cases, Plaintiffs Stephanie Jones and Jonesworks LLC (the "Jones Parties" or "Plaintiffs") and Defendants Wayfarer Studios LLC, Justin Baldoni, Melissa Nathan, and Jennifer Abel (the "Wayfarer Parties" and with the Jones Parties, the "Parties") respectfully jointly move the Court for (1) leave for the Wayfarer Parties to take an additional 30(b)(6) deposition of Jonesworks before taking the depositions of Plaintiffs' damages experts, and (2) for an order extending the deadline for completion of expert depositions from February 28, 2026 to April 30, 2026.

The Parties' agreement and request to the Court to reopen fact discovery for the purpose of allowing the Wayfarer Parties to take an additional 30(b)(6) deposition of Jonesworks arises from the Jones Parties' production of 13 documents alongside their expert reports related to their alleged damages, which had not been produced during fact discovery. To potentially avoid a dispute regarding excluding the documents and the experts' testimony based upon the documents (which the Jones Parties in any event dispute), the Parties agreed to jointly ask the Court to reopen discovery to allow the Wayfarer Parties an additional 30(b)(6) deposition regarding those few documents prior to the expert depositions.

Additionally, the Jones Parties request to extend the expert deposition deadline to April 30, 2026. This accommodates the Wayfarer Parties' schedule and need to complete pretrial submissions (due March 20) and engage in trial preparation in the related *Lively v. Wayfarer* action, Case No. 24-cv-10049, set for May 18, 2026. Extending the expert deposition deadline as requested will not affect any other deadline set by this Court, as no further deadlines are currently scheduled in this action or in the related *Lively v. Wayfarer Studios* action, Case No.24-cv-10049 as relates to the Jones Parties.

Respectfully Submitted,

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