

From: Lindsey Strasberg <Lindsey@SOWDLLP.COM>
Sent: Thu, 9 Nov 2023 17:14:18 -0500 (EST)
To: "Imene Meziane <imene@wayfarerstudios.com>" <imene@wayfarerstudios.com>; "Joseph Lanius (joseph@convergence-ml.com)" <joseph@convergence-ml.com>
Cc: David Weber <David@SOWDLLP.COM>
Subject: Lively - It Ends With Us - CONFIDENTIAL
Attachments: Lively_It Ends With Us_Ltr Nov 9 23.DOCX

Dear Imene and Joseph,

With the tentative resolution of the SAG-AFTRA strike, we are writing to address how to handle a return to the set of "It Ends With Us" (the "Film"). It is no surprise to the Film's producers that the experience of shooting the Film has been deeply concerning on many levels. The complaints of our client and others have been repeatedly conveyed and well-documented throughout pre-production and photography.

While we reserve all legal rights, at this stage our client is willing to forego a more formal HR process in favor of everyone returning to work and finishing the Film as long as the set is safe moving forward. In order for our client to feel safe returning to the production, we are attaching a list of protections that will need to be guaranteed and observed by the Film's producers. If the production is unwilling to accept or uphold these protections, our client is prepared to pursue her full legal rights and remedies.

This letter is not intended to constitute a full statement of all facts and circumstances relating to this matter. It is not intended to be, nor should it be construed as, a waiver, release or relinquishment of any of our client's rights or remedies, legal or equitable, all of which are hereby expressly reserved.

Sincerely,

Lindsey

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Protections for Return to Production

In order for Blake Lively (BL) to be able to return to production on the Film, **each** of the following protections must be agreed to in writing and met without fail going forward:

1. An intimacy coordinator must be present at all times when BL is on set.
2. There must be a closed set during the rehearsal or filming of any scene involving simulated sex or nudity and any observation via remote monitors shall be restricted to essential personnel as approved by BL (to be further described in a fully-negotiated, fully-executed, SAG-compliant nudity rider (“Nudity Rider”)).
3. There is to be no spontaneous improvising of any scenes involving physical touching, simulated sex, or nudity. Scenes involving kissing, depictions of sexual intercourse, or any other physical touching must be contained in the screenplay (as approved by BL), choreographed in advance in the presence of the intimacy coordinator, and may only proceed as choreographed with the consent of all participants in advance.
4. Physical touching and/or comments on BL’s physical appearance must only be done/made in connection with the character and scene work, not as to BL personally. Except as written into the screenplay or as strictly required in connection with make-up or costume preparation, there is to be no physical touching (including hugging) of BL, her on-set personnel and/or her employees.
5. There are to be no discussions of personal experiences with sex or nudity, including as it relates to conduct with spouses or others.
6. No one will enter, attempt to enter, interrupt, pressure, or request entrance to BL’s trailer while she is in a state of undress for any reason.
7. There shall be no rehearsal or filming of any nudity and/or simulated sex without the Nudity Rider in place. Any such footage previously shot without the Nudity Rider in place, and in direct violation of SAG requirements, may not be used without BL’s and her legal representatives’ prior, written consent.
8. BL may have a representative of her choosing present with her on set for the remainder of the rehearsal and shooting days, including while on a closed set.
9. If BL is exposed to COVID-19, she must be provided notice as soon as possible after Wayfarer or any producer or production executive becomes aware of such exposure.
10. There shall be no retaliation of any kind against BL for raising concerns about the conduct described in this letter or for these requirements. Any changes in attitude, sarcasm, marginalization or other negative behavior, either on set or otherwise, including during publicity and promotional work, as a result of these requests is retaliatory and unacceptable, and will be met with immediate action.

11. Sony must have a mutually-approved representative on set for the remainder of the rehearsal and shooting days, including on a closed set, to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
12. Wayfarer will engage an additional, experienced A-level producer, approved by Ms. Lively, to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
13. Wayfarer must empower any existing third party producer with appropriate and customary authority to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
14. Wayfarer will engage an A-list stunt double, approved by Ms. Lively, to rehearse and perform any scenes involving the character “Lily” that depicts rape or any act of sexual violence. Ms. Lively will only perform close-up work or other pre-approved shots for such scenes.
15. Any rehearsal or shooting involving Ms. Lively, or any other performer depicting the character of “Lily,” that involves nudity (including partial nudity) or simulated sex must be conducted strictly in accordance with the Nudity Rider and must adhere to the approved script.
16. Any and all day players must be engaged through customary industry talent agencies and not through personal connections of the director and/or producer.
17. Hold an all-hands, in-person meeting before production resumes which will include the director, all producers, the Sony representative, the newly-engaged third party producer, BL and BL’s designated representatives to confirm and approve a plan for implementation of the above that will be adhered to for the physical and emotional safety of BL, her employees and all the cast and crew moving forward.