

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

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

Civ. Action No. 1:24-cv-10049-LJL  
(Consolidated for pretrial purposes with  
1:25-cv-00449-LJL)

rel. 1:25-cv-00449-LJL

**THIRD-PARTY DEFENDANT  
JONESWORKS LLC'S REPLY IN  
FURTHER SUPPORT OF ITS  
MOTION FOR SPOILIATION  
SANCTIONS**

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

**TABLE OF CONTENTS**

INTRODUCTION .....	1
ARGUMENT .....	2
A. Abel’s Duty to Preserve Was Triggered Before the Signal Messages Disappeared.....	2
B. Abel Used Signal During the Relevant Period and Failed to Preserve Those Communications .....	4
C. Abel’s Destroyed Signal Messages Are Highly Relevant and Not Cumulative .....	6
D. Jonesworks Has Established All Elements for Sanctions Under Rule 37(e)(2).....	8
CONCLUSION.....	10

## INTRODUCTION

Jennifer Abel destroyed critical evidence while anticipating litigation, and now asks this Court to excuse that destruction with semantics and selective memory. Her opposition fails on every ground. Abel [REDACTED]—yet claims her duty to preserve extended only to “[REDACTED]” allegations, not to the public relations campaign launched specifically to counter those very allegations. This artificial distinction collapses under the slightest scrutiny. The PR campaign was conceived for one purpose: to shape the narrative surrounding the on-set conduct that Abel contemporaneously believed would spawn litigation. Communications about that campaign—including whether Abel’s own employer, Jonesworks, participated or even knew about it—were plainly relevant to any anticipated dispute. Abel did not preserve those records, spoliating relevant evidence.

Abel [REDACTED]  
[REDACTED]. Yet Abel produced not a single Signal message prior to December 2024. The reason is obvious: she and her collaborators enabled Signal’s auto-delete feature to ensure these communications would vanish. Abel’s attempt to characterize the missing messages as “cumulative” misses the point entirely. The existing evidence shows Jones and Jonesworks were excluded from the campaign. The Signal messages would have shown that Abel deliberately concealed her actions, operated outside her authority, and aligned herself with a client’s interests against her employer’s. That evidence goes to the heart of Abel’s indemnification claim and her defense that she acted within the scope of her employment.

Abel’s [REDACTED]—and her inability to explain the disappearance of all pre-December 2024 messages—reflects bad faith. This is precisely the conduct Rule 37(e)(2) sanctions are designed to address.

## ARGUMENT

### **A. Abel’s Duty to Preserve Was Triggered Before the Signal Messages Disappeared**

Abel’s principal argument—that she was not required to preserve her Signal messages because she anticipated litigation about “[REDACTED]” in 2023 but not litigation about the PR campaign in 2024—is incorrect as a matter of law and fact. Opp. at 18-20. The “obligation to preserve evidence arises when [a] party has notice that the evidence is relevant to litigation” or “*when a party should have known that the evidence may be relevant to future litigation.*” *Kronisch v. United States*, 150 F.3d 112, 126 (2d Cir. 1998) (emphasis added).

Abel admitted that [REDACTED]  
[REDACTED] Ex. 30 at 7-8; Ex. 31 at No. 23. Those allegations are the very reason the PR campaign existed. The PR campaign Abel seeks to characterize as unrelated was conceived solely to influence the narrative surrounding those misconduct allegations. The distinction Abel now draws is artificial and unavailing. The August 2 Scenario Planning Document makes this explicit: the PR strategy was designed to protect the reputation of Baldoni and Wayfarer studios against Lively’s anticipated public allegations and to prepare for public scenarios. Ex. 15. [REDACTED]

[REDACTED] Ex. 29 at 5-6.

Abel cannot plausibly claim that PR work designed to manage anticipated litigation fallout was irrelevant to that litigation. The PR campaign was not an independent, unrelated activity—it was part and parcel, undertaken specifically to manage the fallout from the very conduct that Abel admits she believed would lead to litigation. Opp. at 21, Garafalo Decl. Ex. 57, 9/25/25 Abel Dep. Tr. 78:22-79:6 [REDACTED]

[REDACTED]). Communications about

that PR work—including how it was conceived, who participated, and, critically here, whether Jones and Jonesworks were involved—were plainly relevant to any anticipated litigation concerning Lively’s allegations.

None of the authorities Abel cites support her distorted argument that the preservation duty is limited to the specific legal theory ultimately asserted or begins only once suit is filed. *See* Opp. at 18, citing *Kronisch*, 150 F.3d at 126-27 (“This obligation to preserve evidence arises . . . *also on occasion in other circumstances, as for example when a party should have known that the evidence may be relevant to future litigation.*”) (emphasis added) and *Kosmidis v. Port Auth. of New York & New Jersey*, 2020 WL 5754605, at \*4 (S.D.N.Y. Aug. 27, 2020), *report and recommendation adopted*, No. 18-CV-8413 (AJN), 2020 WL 7022479 (S.D.N.Y. Nov. 30, 2020) (internal citations omitted) (“The duty to preserve can arise even before the formal initiation of an action, once a party reasonably anticipates litigation.”). Abel admitted that she [REDACTED] Ex. 31 at No. 23. And, under own authority, her duty to preserve was triggered by mid-August 2024 at the latest.<sup>1</sup> Abel’s attempt to cabin her preservation duty to what happens to now be preserved to avoid the consequences of this motion is untenable.

Moreover, Abel’s timeline is off base. She claims she could not have anticipated litigation over “August 2024 public relations activities” in November 2023 because those “public relations activities” had not yet occurred. Opp. at 20. But her duty to preserve did not end in November 2023—it continued and intensified as litigation became increasingly likely. By August 2024, when Abel was actively using Signal to coordinate PR strategy and [REDACTED]

---

<sup>1</sup> Abel received explicit notice that a lawsuit may be afoot on November 10, 2023, when she saw Lively’s lawyer’s letter threatening that Lively was “prepared to pursue her full legal rights and remedies.” Garofalo Decl. Ex. 18 (HEATH\_000049558).

[REDACTED], the foreseeability of litigation was undeniable. By that point at the latest, her duty to preserve communications relating to that anticipated litigation attached, regardless of when those communications occurred.

**B. Abel Used Signal During the Relevant Period and Failed to Preserve Those Communications**

Abel claims Jonesworks “does not show that Abel used Signal prior to December 20, 2024 to communicate about Lively.” Opp. at 20. This is demonstrably false.

*First*, [REDACTED]  
[REDACTED]. Opp. at 21, Garafalo Decl. Ex. 57, 9/25/25 Abel Dep. Tr. 78:22-79:6. The timing is not coincidental. When Abel was asked whether she used Signal for Wayfarer during the campaign, she did not deny it; instead, she claimed she [REDACTED].” Ex. 3, 9/26/25 Abel Dep. Tr. at 250:17-252:2. This loss of memory is not exculpatory. To the contrary it, combined with the complete absence of any Signal production from before December 2024, supports the inference that Abel did in fact use Signal and that those messages have been deleted.

*Second*, Heath testified that he believed he communicated with Abel via Signal during the relevant period. Ex. 33, Oct. 8, 2025 Deposition of Jamey Heath (“10/8/25 Heath Dep. Tr.”) at 359:15-24, 364:2-7) (confirming he may have started using Signal to speak with Abel and Nathan by September 2024). Because there is no evidence suggesting that Heath and Abel worked together on any other client or project during that period, Heath’s recollection confirms that Signal was used for the campaign.

*Third*, Abel was added to Signal threads during this period. On August 12, 2024, Nathan started a new [REDACTED]

[REDACTED] Ex. 29 at 5-6. This [REDACTED]

[REDACTED] is strong evidence that Signal was being used for substantive communications about the anticipated litigation. This also demonstrates that Abel understood the nature of the communications and consciously chose to shift them to a platform that she could enable to automatically delete them.

Abel relies on *Cooper Foods International, LLC v. Yourd*, arguing that “speculation” about deleted messages does not show spoliation. Opp. at 22 (citing 2025 WL 2663977, at \*2 (E.D.N.Y. Sept. 17, 2025)). There, the court denied spoliation sanctions because the movant’s argument rested on the “speculative assertion” that because the parties communicated on WhatsApp at other times, similar messages must have existed during the relevant period. *Id.* at \*2-3. Here, by contrast, there is direct, contemporaneous evidence that Signal communications existed during the relevant period and that Abel participated in them: (1) [REDACTED] (Ex. 29); (2) she [REDACTED] (*id.*); (3) Heath testified that he may have communicated with Abel via Signal during the campaign (Ex. 33 at 364:2-7); and (4) Abel [REDACTED] (Opp. at 21, Garafalo Decl. Ex. 57, 9/25/25 Abel Dep. Tr. 78:22-79:6). *Cooper Foods* therefore underscores that Jonesworks has established spoliation.<sup>2</sup>

---

<sup>2</sup> Each of *Dilworth*, *Adato*, and *Khaldei* (Opp. at 23) are likewise inapposite because the courts there denied sanctions for the same fundamental reason that is *not* present here: the movants failed to establish that the allegedly missing materials ever existed, making their spoliation theories entirely speculative. See *Dilworth v. Goldberg*, 3 F.Supp. 3d 198, 202, 202-03 (S.D.N.Y. 2014) (rejecting sanctions where plaintiffs offered only conjecture and “pure speculation” that sought after evidence existed); *Adato v. Gala Tour, Inc.*, 2011 WL 4458852, at \*10-11 (E.D.N.Y. Sept. 23, 2011) (denying sanctions because plaintiffs “have not established that the subject evidence ever existed” where no witness testified a logbook entry about the incident was ever created); *Khaldei v. Kaspiiev*, 961 F. Supp. 2d 564, 569-70 (S.D.N.Y. 2013), *aff’d*, 961 F.Supp. 2d 572 (S.D.N.Y. 2013) (rejecting spoliation claim where plaintiff’s theory that evidence was destroyed amounted to “pure speculation” and there was no actual loss of evidence). Here, the evidence, by Abel’s own admission, existed but was not preserved.

Finally, Abel's pure speculation that perhaps she used Signal only for unrelated matters, Opp. at 21, is contradicted by witness testimony (Ex. 33 at 364:2-7), contradicted by timing (Opp. at 21, Garafalo Decl. Ex. 57, 9/25/25 Abel Dep. Tr. 78:22-79:6), contradicted by the shift of attorney communications to Signal (Ex. 29), and contradicted by the complete absence of messages from the app during the relevant window. Abel cannot escape spoliation sanctions through speculation that evaporates under scrutiny.

**C. Abel's Destroyed Signal Messages Are Highly Relevant and Not Cumulative**

Abel argues that even if Signal messages existed and were deleted, they would be merely "cumulative" of other evidence showing Jonesworks was excluded from the PR campaign. Opp. at 23. This fundamentally misunderstands the law at issue and the relevance of the destroyed evidence. Abel's own cited authority confirms that spoliation turns on whether evidence was lost or destroyed, not on whether additional proof might have supplemented existing evidence. *See Khaldei*, 961 F. Supp. 2d at 569-70 (spoliation doctrine "predicated on evidence actually exist[ing] and [being] destroyed" and no sanctions warranted where evidence "has not in fact been destroyed" and remains available for inspection). Abel's reliance on "cumulative evidence" cases is thus misplaced. Opp. 23. None of the authorities she cites for that contention concern spoliation or sanctions, and, of course, none stand for the proposition that a party may withhold or spoliates relevant documents in discovery simply because they may be "cumulative".<sup>3</sup>

Abel's indemnification claim turns on whether she "conducted the actions at issue in the Lively Complaint in the course of her employment at Jonesworks and at the direction of

---

<sup>3</sup> Abel incorrectly conflates admissibility under Rule 403 with the standard for spoliation. Of course, Rule 403 does not address spoliation and, in any event, courts have recognized that the loss of even "cumulative" evidence may "still cause[] substantive prejudice to the innocent plaintiff because 'Plaintiff's case against Defendants is weaker when it cannot present the overwhelming quality of evidence it otherwise would have to support its case.'" *Cat3, LLC v. Black Lineage, Inc.*, 164 F. Supp. 3d 488, 497 (S.D.N.Y. 2016) (quoting *Victor Stanley, Inc. v. Creative Pipe, Inc.*, 269 F.R.D. 497, 533 (D. Md. 2010)).

Jonesworks.” ECF No. 852 at 27. The destroyed Signal messages would show she did not. They would show deliberate concealment: Abel’s choice to use Signal rather than normal business channels indicates she knew she lacked authority and sought to hide her conduct from Jones. They would show decision-making by Abel, not Jones or Jonesworks: the content would depict Abel alone setting strategy, coordinating with Nathan and Wallace, and directing the campaign without Jones’s knowledge or approval. *See* ECF No. 1050 at 19-24 (discussing disputed facts bearing on whether Abel acted within the scope of her employment, including evidence that she operated independently of Jonesworks, excluded Jones from the PR strategy, and coordinated campaign activity without Jonesworks’ knowledge or authorization). And they would show personal benefit: the messages may reveal Abel’s conspiracy to leave Jonesworks, take the Wayfarer account, and continue working with Nathan—evidence that she acted for herself, not for the company. *Id.* This evidence goes to the heart of whether Abel was operating within the scope of her employment. *Id.* Abel’s use of Signal to operate independent of the Jonesworks platform and thus hide her activities from Jones is powerful evidence that she was not.

Moreover, Abel’s “cumulative” argument is inconsistent with her own litigation position. Abel seeks summary judgment on indemnification by contending that she acted within the scope of her employment and with Jonesworks’ knowledge and authorization, ECF No. 945, yet she simultaneously dismisses evidence showing Jones was excluded from her actions as supposedly “cumulative.” These positions cannot be reconciled. If Abel genuinely acted with Jones’s awareness and direction, then communications demonstrating concealment, circumvention of Jones, or unilateral decision-making would be uniquely probative—not cumulative—of whether Abel’s indemnification theory is false. Abel cannot both assert company-sanctioned conduct

warranting summary judgment and argue that evidence of concealment and exclusion adds nothing to the record.

The existing emails and text messages produced in this litigation show that Jones was excluded from the Wayfarer PR strategy. ECF No. 1050 at 23-24. The Signal messages would have shown how and why. They would have revealed that Abel consciously hid her actions from her employer, that she coordinated strategy that contradicted Jones's directives, and that she aligned herself with Wayfarer's interests rather than those of Jonesworks. *Judith M. v. Sisters of Charity Hosp.*, 715 N.E.2d 95, 96 (N.Y. 1999); *see also Riviello v. Waldron*, 391 N.E.2d 1278, 1281 (N.Y. 1979) (factors include whether the specific act was one that the employer could reasonably have anticipated); ECF No. 1050 at 18-25 (collecting cases showing the factors courts consider in deciding whether an employee was acting within the scope of her employment for indemnification purposes). Those facts bear directly on whether Abel acted within the scope of her employment—the central issue in her indemnification claim. *Id.* The Signal messages would also show that Abel affirmatively chose to use an ephemeral messaging platform to coordinate work for Jones's own client behind Jones's back. This goes directly to Abel's state of mind, her intent to conceal her activities, and whether she was acting within or outside the scope of her employment. *Id.*

**D. Jonesworks Has Established All Elements for Sanctions Under Rule 37(e)(2)**

Abel applies the four-factor test from *Charlestown Capital Advisors* but fails to meaningfully address what Jonesworks showed in its Motion—i.e., how the facts here readily satisfy each factor and establish Abel's intent to deprive required under Rule 37(e)(2). 337 F.R.D. 47, 67 (S.D.N.Y. 2020). The test requires: “(1) evidence once existed that could fairly be supposed to have been material. . . ; (2) the spoliating party engaged in an affirmative act causing the evidence to be lost; (3) the spoliating party did so while it knew or should have known of its duty to preserve

the evidence; and (4) the affirmative act causing the loss cannot be credibly explained as not involving bad faith.” *Id.* Each factor is readily established here.<sup>4</sup>

As to the first factor—whether evidence once existed that could fairly be supposed to have been material—the answer is yes. [REDACTED]. Ex. 29 at 5-

6. She [REDACTED].

*Id.* She cannot credibly deny she participated in these threads; she [REDACTED]

[REDACTED] Ex. 3, 9/26/25 Abel Dep. Tr. at 250:17-252:2. And the materiality of these messages to Abel’s indemnification claim is obvious: they would show that Abel acted outside the scope of her employment, that Jones was not involved in the campaign, and that Abel deliberately sought to conceal her activities from her employer by using an ephemeral platform. *See* ECF No. 1050 at 18-24 (discussing factors courts consider in determining whether an employee is entitled to indemnification). They would also show that Abel was acting in her own self-interest and adverse to Jonesworks, as continued use of Signal to coordinate Wayfarer-related activity would reflect a pattern of unilateral, unauthorized conduct rather than an isolated lapse. *Id.* Because Abel bears the burden of establishing that any liability arose from actions taken on behalf of—and for the benefit of—Jonesworks, evidence showing that she acted independently, in her own interest, or against Jonesworks’ interests is directly relevant to her indemnification claim.

The second factor—whether Abel engaged in an affirmative act causing the evidence to be lost—is equally clear. Signal does not auto-delete messages by default, the auto-delete feature

---

<sup>4</sup> Abel’s contention that Jonesworks must prove the contents of the spoliated messages misstates the law. Opp. at 20–24. A party seeking spoliation sanctions is not required to reconstruct or prove the substance of evidence that was destroyed as destruction itself forecloses such proof and permits a reasonable inference of prejudice. *See Apple Inc. v. Samsung Elecs. Co.*, 888 F. Supp. 2d 976, 993 (N.D. Cal. 2012) (“[N]either Apple nor the Court may ever know the contents of any destroyed Samsung emails, [but] the fact that the emails of key Samsung witnesses were among those destroyed permits the reasonable inference that Apple was prejudiced by Samsung’s spoliation.”).

must be manually enabled. Opp. at 14 (“[T]o the extent Signal was used, the participants had Signal set on its auto-delete feature.”) (citing exhibits). This means Abel and the other Defendants could only have lost these messages because they affirmatively enabled Signal’s disappearing-messages setting. This was a conscious choice to ensure communications would not be preserved, not a passive failure to act.

As to the third factor—whether Abel knew or should have known of her preservation duty—Abel admits she [REDACTED] Ex. 31 at No. 23. [REDACTED] Ex. 29 at 5-6; Ex. 30 at 7-8. There can be no serious dispute that Abel was on notice of her obligation to preserve relevant communications when she chose to use Signal’s auto-delete feature.

Finally, Abel’s conduct reveals bad faith. [REDACTED] strains credulity given the documentary evidence showing [REDACTED] [REDACTED]. And her purported justification—that Signal was chosen for security reasons to protect against “hackers and aggressive media players,” (Opp. at 29)—does not explain why the auto-delete feature was necessary, particularly when Abel knew she had a duty to preserve these communications for anticipated litigation. The far more plausible explanation is that Abel and her co-conspirators chose Signal precisely because it would make their coordination disappear without a trace. The Court should therefore impose sanctions under Rule 37(e)(2), including an adverse inference and preclusion as requested.

### **CONCLUSION**

For the foregoing reasons, Jonesworks LLC respectfully requests that the Court enter an order granting Jonesworks’ motion for Rule 37(e) sanctions in its entirety.

Dated: December 8, 2025

By: /s/ Kristin Tahler

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

Kristin Tahler  
865 S. Figueroa Street, 10th Floor  
Los Angeles, California 90017  
(213) 443-3000  
kristintahler@quinnemanuel.com

Maaren A. Shah  
Morgan L. Anastasio  
295 5th Avenue  
New York, New York 10016  
(212) 849-7000  
maarensah@quinnemanuel.com  
morgananastasio@quinnemanuel.com

Nicholas Inns (*pro hac vice*)  
1300 I Street NW  
Suite 900  
Washington, D.C. 20005  
(202) 538-8000  
nicholasinns@quinnemanuel.com

*Attorneys for Jonesworks LLC*

# **DECLARATION**

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

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

Civ. Action No. 1:24-cv-10049-LJL  
(Consolidated for pretrial purposes with  
1:25-cv-00449-LJL)  
rel. 1:25-cv-00449-LJL

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

**DECLARATION OF KRISTIN TAHLER IN SUPPORT OF JONESWORKS LLC'S  
MOTION FOR SPOILIATION SANCTIONS**

I, Kristin 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 Jonesworks LLC (“Jonesworks”) in the above-captioned action.

2. I respectfully submit this declaration in support of Jonesworks’ Motion for

Spoliation Sanctions against Third-Party Plaintiff Jennifer Abel (“Abel”).

3. A true and correct copy of correspondence between Lindsey Strasberg, Imene Meziane, Joseph Lanius, and David Weber, dated November 9, 2023, bearing beginning Bates number WAYFARER\_000140991, is attached hereto as **Exhibit 1**.

4. A true and correct copy of correspondence between [REDACTED]  
[REDACTED] bearing beginning Bates number BALDONI\_000020294, is attached hereto as **Exhibit 2**.

5. A true and correct copy of excerpts from the transcript of the deposition of Jennifer Abel, taken on September 26, 2025, is attached hereto as **Exhibit 3**.

6. A true and correct copy of correspondence between [REDACTED]  
[REDACTED] bearing beginning Bates number TOSKOVIC\_000000677, is attached hereto as **Exhibit 4**.

7. A true and correct copy of correspondence among counsel dated August 18, 2025 through August 26, 2025, is attached hereto as **Exhibit 5**.

8. A true and correct copy of correspondence between [REDACTED]  
[REDACTED], bearing beginning Bates number BBKOSLOW-000008776, is attached hereto as **Exhibit 6**.

9. A true and correct copy of correspondence between [REDACTED]  
[REDACTED], bearing beginning Bates number BBKOSLOW-000005048, is attached hereto as **Exhibit 7**.

10. A true and correct copy of correspondence among counsel dated August 28, 2025 through September 11, 2025, is attached hereto as **Exhibit 8**.

11. A true and correct copy of excerpts from the transcript of the deposition of Justin Baldoni, taken on October 6, 2025, is attached hereto as **Exhibit 9**.

12. A true and correct copy of correspondence among counsel, dated August 1, 2025 through August 11, 2025, and an attachment of the search terms agreed upon on August 11, 2025, is attached hereto as **Exhibit 10**.

13. A true and correct copy of excerpts from the transcript of the deposition of Jamey Heath taken on October 9, 2025, is attached hereto as **Exhibit 11**.

14. A true and correct copy of correspondence between [REDACTED], bearing beginning Bates number JONESWORKS\_JB\_000001142, is attached hereto as **Exhibit 12**.

15. A true and correct copy of correspondence between [REDACTED], bearing beginning Bates number HANKS\_000000016, is attached hereto as **Exhibit 13**.

16. A true and correct copy of correspondence between counsel, dated August 13, 2025 through August 15, 2025, and an attachment of the search terms agreed upon on August 15, 2024, is attached hereto as **Exhibit 14**.

17. A true and correct copy of correspondence between [REDACTED], bearing beginning Bates WAYFARER\_000141577, is attached hereto as **Exhibit 15**.

18. A true and correct copy of The Agency Group's ("TAG") Scope of Work prepared for Wayfarer Studios LLC ("Wayfarer") and Justin Baldoni, dated July 26, 2024, bearing

beginning Bates number WAYFARER\_000135368, is attached hereto as **Exhibit 16**.

19. A true and correct copy of TAG's agreement for services with Wayfarer, dated August 2, 2024, bearing beginning Bates number WAYFARER\_000133653, is attached hereto as **Exhibit 17**.

20. A true and correct copy of excerpts from the transcript of the deposition of Jennifer Abel, taken on September 25, 2025, is attached hereto as **Exhibit 18**.

21. A true and correct copy of correspondence between [REDACTED] [REDACTED] bearing beginning Bates number KCASE-000000585, is attached hereto as **Exhibit 19**.

22. A true and correct copy of correspondence between [REDACTED] [REDACTED], bearing beginning Bates number KCASE-000005118, is attached hereto as **Exhibit 20**.

23. A true and correct copy of correspondence between [REDACTED] [REDACTED], bearing beginning Bates number KCASE-000002654, is attached hereto as **Exhibit 21**.

24. A true and correct copy of correspondence between Katie Case, Jamey Heath, Jennifer Abel, Melissa Nathan, and Breanna Butler Koslow, dated August 7, 2024, bearing beginning Bates number ABEL\_000005094, is attached hereto as **Exhibit 22**.

25. A true and correct copy of correspondence between [REDACTED] [REDACTED] [REDACTED] [REDACTED], bearing beginning Bates number HEATH\_000048496, is attached hereto as **Exhibit 23**.

26. A true and correct copy of excerpts from the transcript of the deposition of Jed

Wallace, taken on October 10, 2025, is attached hereto as **Exhibit 24**.

27. A true and correct copy of correspondence among Counsel dated September 26, 2025 through September 29, 2025, is attached hereto as **Exhibit 25**.

28. A true and correct copy of correspondence between Jennifer Abel and Melissa Nathan, dated August 9, 2024, bearing beginning Bates number JONESWORKS\_00016275, is attached hereto as **Exhibit 26**.

29. A true and correct copy of correspondence between Jennifer Abel and Melissa Nathan, dated July 29, 2024, bearing beginning Bates number JONESWORKS\_00037451, is attached hereto as **Exhibit 27**.

30. A true and correct copy of correspondence between [REDACTED], bearing beginning Bates number JONESWORKS\_WAYFARER\_000004205, is attached hereto as **Exhibit 28**.

31. A true and correct copy of correspondence between [REDACTED], bearing beginning Bates number NATHAN\_000002151, is attached hereto as **Exhibit 29**.

32. A true and correct copy of correspondence between [REDACTED], bearing beginning Bates number NATHAN\_000002237, is attached hereto as **Exhibit 30**.

33. A true and correct copy of Defendant/Third-Party Plaintiff Jennifer Abel's Responses and Objections to Plaintiff Blake Lively's Seventh Set of Interrogatories, dated September 29, 2025, is attached hereto as **Exhibit 31**.

34. A true and correct copy of correspondence between [REDACTED], bearing beginning Bates number BBKOSLOW-000004099, is

attached hereto as **Exhibit 32**.

35. A true and correct copy of excerpts from the transcript of the deposition of Jamey Heath taken on October 8, 2025, is attached hereto as **Exhibit 33**.

36. A true and correct copy of excerpts from the transcript of the deposition of Melissa Nathan taken on September 29, 2025, is attached hereto as **Exhibit 34**.

37. A true and correct copy of excerpts from the transcript of the deposition of Jed Wallace, taken on October 9, 2025, is attached hereto as **Exhibit 35**.

38. A true and correct copy of correspondence between [REDACTED]  
[REDACTED], bearing beginning Bates number NATHAN\_000018774, is attached hereto as **Exhibit 36**.

39. A true and correct copy of correspondence between [REDACTED]  
[REDACTED], bearing beginning Bates number ABEL\_000019523, is attached hereto as **Exhibit 37**.

40. A true and correct copy of correspondence between [REDACTED]  
[REDACTED], bearing beginning Bates number NATHAN\_000003332, is attached hereto as **Exhibit 38**.

41. A true and correct copy of correspondence [REDACTED],  
bearing beginning Bates number STREET 3.000495, is attached hereto as **Exhibit 39**.

42. A true and correct copy of excerpts from the transcript of the deposition of Katie Case, taken on September 5, 2025, is attached hereto as **Exhibit 40**.

43. A true and correct copy of correspondence between [REDACTED]  
[REDACTED], bearing beginning Bates number KCASE-000004949, is attached hereto as **Exhibit 41**.

44. A true and correct copy of an audio file of [REDACTED]  
[REDACTED] bearing beginning Bates number KCASE-000004957, is  
attached hereto as **Exhibit 42**.

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

DATED: October 22, 2025  
Los Angeles, California

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

By : /s/ Kristin Tahler

Kristin Tahler  
865 S. Figueroa Street, 10th Floor  
Los Angeles, California 90017  
(213) 443-3000  
kristintahler@quinnemanuel.com

Maaren A. Shah  
Morgan L. Anastasio  
295 5th Avenue  
New York, New York 10016  
(212) 849-7000  
maarenschah@quinnemanuel.com  
morgananastasio@quinnemanuel.com

Nicholas Inns (*pro hac vice*)  
1300 I Street NW  
Suite 900  
Washington, D.C. 20005  
(202) 538-8000  
nicholasinns@quinnemanuel.com

*Attorneys for Third-Party Defendant  
Jonesworks, LLC*

# **EXHIBIT 4**

+ [REDACTED]

**Thread Participants:** + [REDACTED] Jamey Heath; + [REDACTED] Mitz Toskovic (Owner);  
[REDACTED] Mitz Toskovic (Owner)

**Active Participants:** + [REDACTED] Jamey Heath; + [REDACTED] Mitz Toskovic (Owner)

**First Message:** 6/17/2024 12:48:07 PM

**Last Message:** 6/17/2024 3:26:45 PM

+ [REDACTED] Mitz Toskovic (Owner)

Why is there a suitcase here at the office ? Did you need this?

6/17/2024 12:48:07 PM

+ [REDACTED] Mitz Toskovic (Owner)

Yes!! It should use google authenticator. It was supposed to default to that

6/17/2024 2:10:47 PM

+ [REDACTED] Mitz Toskovic (Owner)

Im resetting it. Should put you back to the first window. But it need like 15 mins to connect with support

6/17/2024 2:13:11 PM

+ [REDACTED] Jamey Heath

Can you just turn off my 2 step

6/17/2024 2:14:38 PM

+ [REDACTED] Mitz Toskovic (Owner)

I will try

6/17/2024 2:15:05 PM

+ [REDACTED] Mitz Toskovic (Owner)

Are you getting emails? Can you reply approved on the email I jsut sent? Frame will reset your authentication

6/17/2024 2:32:18 PM

+ [REDACTED] Jamey Heath

Got a big job for you

6/17/2024 3:14:59 PM

+ [REDACTED] Mitz Toskovic (Owner)

Yes!

6/17/2024 3:18:16 PM

+ [REDACTED] Jamey Heath

I need you to start putting a timeline doc.  
Try to get as close to dates as possible. We can fill in the  
Links when I get back. But..  
When Justin and Blake met to write. AJ maybe had in  
calendr  
Can you access?  
When we shot the first karaoke scene (it's when I showed  
her the video of Tasha)  
When ange visited the first time and had the "make up  
trailer convo that apparently looked at her"  
When we shot the graveyard scene.  
When Justin met with trainer.  
When Justin had convo with Blake and Ryan regarding  
asking about her weight.  
When we had the convo when we went back in Blake's  
house with ange and Todd.  
Essentially anything we can get either the date and  
alleged incident or the general time frame and we can  
narrow in later. Something chronological. Best you can.  
Consult with Reese where needed. The doc can be have  
gaps but at least let's get something started.

6/17/2024 3:24:19 PM

+ [REDACTED] Jamey Heath

Whatever you can remember whatever Reese remembers  
whatever AJ may remember. Anything at all. Also when  
we got letter from Blake.  
Just anything that tells the story chronologically, and then  
we would just continue to build it

6/17/2024 3:26:45 PM

# **EXHIBIT 8**

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Thursday, September 11, 2025 6:13 PM  
**To:** Morgan Anastasio  
**Cc:** Theresa Troupson; Rose Khatchikian; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman; Ellyn Garofalo; Amir Kaltgrad; Kim Zeldin; Summer Benson; Cortni Davis; Joanna Rivera; Vaneta Birtha; Christina Puello; Local MS. Counsel; Local KAF. Counsel; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler; Maaren Shah; Nicholas Inns  
**Subject:** RE: Jones v. Abel - Interrogatories  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

---

Morgan,

I write in response to your September 9 correspondence regarding document discovery in *Jones v. Abel* (the “Jonesworks Action”). In the interest of civility, this response will ignore the pejoratives and focus on the substance, including your repeated and deliberate misrepresentations of the facts.

We have worked diligently and cooperatively with the Jones Parties, providing far more information than required under the governing rules, including sharing original search terms, custodians, sources of data, and raw hit reports across all data sources. We have worked in good faith to resolve any remaining concerns. The application of the vastly expanded search terms you requested required the Wayfarer Parties to process and review enormous amounts of additional data, on short notice, and we did so to provide the Jones Parties with what they asked for. Only one source of data remains, Signal communications, which has presented significant technical hurdles. We have repeatedly conveyed this to you and have represented that we will produce any non-privileged, responsive documents from the Signal data no later than tomorrow.

As for the purported documents identified in your email, I suggest you review the Wayfarer Parties’ document production more closely. We are investigating your allegation and have so far located an email and attachment that you claim was not produced. The Bates numbers on the documents, JA2472 through 2474, prove otherwise. We are also puzzled by your claim that “neither [Ms. Ahourian] nor [Mr. Freedman] was [Nathan’s] attorney regarding this case[,]” as both have been counsel for the Wayfarer Parties from the commencement of this litigation.

In light of our extensive correspondence, innumerable phone calls and conferences, and generally collegial and cooperative working relationship, your unfounded accusations of impropriety are, frankly, offensive.

We are available tomorrow to meet and confer regarding the Jonesworks 30(b)(6) topics. Please provide your availability.

Thanks,  
Jason

Jason H. Sunshine, Esq.

LINER FREEDMAN TAITELMAN + COOLEY LLP

1801 Century Park West, 5<sup>th</sup> Floor

Los Angeles, California 90067

Tel: (310) 201-0005

Direct: (310) 201-4285

[REDACTED]

Fax: (310) 201-0045

Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from ftllp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <morgananastasio@quinnemanuel.com>

**Sent:** Wednesday, September 10, 2025 12:11 PM

**To:** Jason Sunshine <jsunshine@lftcllp.com>

**Cc:** Theresa Troupson <ttroupson@lftcllp.com>; Rose Khatchikian <rkhatchikian@lftcllp.com>; matthew@umklaw.com; anthony@umklaw.com; jonas@umklaw.com; Bryan Freedman <bfreedman@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Amir Kaltgrad <akaltgrad@lftcllp.com>; Kim Zeldin <kzeldin@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Joanna Rivera <jrivera@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Christina Puello <cpuello@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Kristin Tahler <kristintahler@quinnemanuel.com>; Maaren Shah <maarensah@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>

**Subject:** RE: Jones v. Abel - Interrogatories

Jason,

The Wayfarer Parties' continued and repeated failures to provide timely and complete document productions in this case have prejudiced and continue to prejudice our clients.

As you well know, the deadline for substantial completion of document production in this case was initially July 1, 2025. The Wayfarer Parties missed that deadline, producing a miniscule number of documents before that date. The Court subsequently set a deadline that the production of documents in response to requests served before July 15 be completed by July 25, and a deadline that all documents be produced in response to later issued requests before August 15. The Wayfarer Parties missed both of those deadlines too. You subsequently assured us that the Wayfarer Parties would complete documents productions by August 27, including promising on August 11 to search Signal messages; the Wayfarer Parties did not and belatedly informed us they did not search Signal messages as agreed and required. Now, after nearly half a dozen depositions have been taken, the Wayfarer Parties assert, unilaterally, that they need yet more time to produce documents that should, by court order, have been produced months ago.

Just Monday, September 8, the Wayfarer Parties compounded their discovery failures and the prejudice they are inflicting. On that one day—months after substantial completion—the Wayfarer Parties produced tens of thousands of documents. They also defied yet another court order in *Lively v. Wayfarer Studios*, failing to produce Signal data as ordered and taking the liberty of granting themselves an extension under the guise of seeking one from the Court, which the Court swiftly denied. In that same purported extension request, the Wayfarer Parties now represent that they will not produce Signal data in the related case until September 15—even later than your already overly tardy production proposal below.

This pattern of discovery defiance and deficiency is materially prejudicing Jonesworks' ability to litigate this case. On September 8, Jonesworks deposed Tera Hanks, Wayfarer Studios' president, without the benefit of the tens of thousands of pages of documents Wayfarer produced that same day or of the Signal data the Wayfarer Parties still have not produced. On September 5 and 9, Jonesworks deposed two third parties—a current and former employee of The Agency Group—both of whom testified to the use of Signal to communicate regarding the events at issue in this case, including Melissa Nathan's surreptitious campaign to defame Jonesworks and Ms. Jones. Yet, the Wayfarer Parties have not even begun production of Signal messages.

Those depositions have also confirmed that the Wayfarer Parties' productions—to the extent they have made them—are deficient. For example, Ms. Case testified that (1) she participated in a Signal chat with Jed Wallace and Melissa Nathan regarding their scheme to defame Jonesworks, (2) Ms. Nathan sent an email to Business Insider as part of her effort to prompt a negative article about Jonesworks; and (3) she sent TAG PR's statement of work to Ms. Abel's [rwacomunications.com](mailto:rwacomunications.com) email address. The Wayfarer Parties have produced none of these documents despite their obvious relevance. In addition, just yesterday, Ms. Koslow testified that Ms. Nathan sent an email to a Variety reporter with statements attacking Jonesworks and Ms. Jones, and that she participated in a message thread with Mr. Freedman and Ms. Ahouraian, neither of whom was her attorney, regarding this case. The Wayfarer Parties have not produced these communications either.

Additionally, given Ms. Case's testimony about her and Ms. Nathan's involvement in the websites and social media pages disparaging Ms. Jones on behalf of prospective TAG client Dwayne Johnson, we also expect you to conduct a manual search and produce all communications (including Signal messages) or documents between any of Ms. Nathan, Ms. Case, Mr. Johnson, Mr. Wallace or anyone else at TAG about Ms. Jones, Jonesworks, or relating to the disparaging websites or related social media pages or the Business Insider article, including any payment in connection with the sites and pages.

Jonesworks reserves its right to pursue all available remedies for the prejudice caused by the Wayfarer Parties' refusal to participate in discovery in good faith, including but not limited to reopening each and every deposition taken before the Wayfarer Parties fully comply with their document production obligations, and seeking monetary, evidentiary, and terminating sanctions. To prevent this prejudice from continuing to grow, the Wayfarer Parties must immediately produce all outstanding documents, including Signal messages, the specific documents identified above, and all other documents the Wayfarer Parties have wrongfully failed to produce. Further, because of the Wayfarer Parties' unreasonable document production failures, they must immediately provide a comprehensive description, for each of the 4 parties to this case, of (1) each and every source from which documents were collected (including every application, platform, account, and other repository); (2) describe the means by which documents were collected from each such source (including the specific software used and identifying the individual performing the collection); (3) describe each and every search conducted to identify potentially relevant documents including the source and time period to which each search was applied; and (4) describe the process by which the Wayfarer Parties reviewed documents to identify those that were responsive (including the standards used to determine responsiveness and the identities of the individuals conducting the review).

We agree with the Lively Parties that the Wayfarer Parties' repeated discovery failures have upended the planned deposition schedule. So too has the Wayfarer Parties' belated 30(b)(6) notice on Jonesworks, which they failed to serve until just one week before the scheduled deposition noticing 25 topics. We are willing to discuss with you and the Lively Parties the consequences to the planned schedule caused by your delinquent discovery conduct.

Jonesworks reserves all rights. We await your response.

Best,  
Morgan

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Friday, September 5, 2025 5:17 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>  
**Subject:** RE: Jones v. Abel - Interrogatories

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

For clarity, my email below refers to the production of Signal data with respect to the Jonesworks action.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

**From:** Jason Sunshine  
**Sent:** Friday, September 5, 2025 1:43 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>  
**Subject:** RE: Jones v. Abel - Interrogatories

Morgan,

With respect to the supplemental production of Signal data, I am being told that, given the demands of the Court-ordered production in the Lively action, we will not be able to make the production on Monday. We are working as quickly as possible and will produce no later than (and likely earlier than) September 12<sup>th</sup>.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from filp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Jason Sunshine  
**Sent:** Wednesday, September 3, 2025 5:22 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>  
**Subject:** RE: Jones v. Abel - Interrogatories

Morgan,

I'm following up on the redactions referenced in your previous email. Having re-reviewed the documents, the non-responsiveness redactions are appropriate. We do not intend to un-redact them.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Jason Sunshine

**Sent:** Wednesday, September 3, 2025 3:38 PM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>

**Subject:** RE: Jones v. Abel - Interrogatories

Morgan,

Having conferred with our vendor, you are correct that the bates ranges referenced in my previous email do not, in fact, exist. However, the documents were produced in the Jonesworks and Lively actions (JONESWORKS\_WAYFARER\_000003756; WAYFARER\_000135375). I will revert on the balance of your email.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Sent:** Wednesday, September 3, 2025 2:39 PM

**To:** Jason Sunshine <[j sunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)>

**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha

<[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>

**Subject:** RE: Jones v. Abel - Interrogatories

Counsel,

First, you were quite clear yesterday that you did not search Signal messages for your August 27 production. You now claim that you already have searched Signal messages. We do not understand why you are unable to clearly communicate whether or not you searched for documents in line with your prior agreements. Regardless, we appreciate that you now will be producing all non-privileged responsive communications, as you agreed to do. For the avoidance of doubt, please immediately confirm that you will be producing documents responsive to the Jones' Parties' requests in the Jones and Lively actions, and not just the Lively Parties' requests, and that the production will include WhatsApp and Signal messages. Given that you have already searched such messages, please produce them as soon as possible and in any event no later than **tomorrow at 12 pm**, given Friday's deposition.

Second, you did not produce any of the documents you note in your email. Your August 27 and 29 productions included documents with only the following bates ranges:

- Jonesworks\_JA\_003: JONESWORKS\_JA\_000001774 - JONESWORKS\_JA\_000002152
- Jonesworks\_JB\_004: JONESWORKS\_JB\_000002044 - JONESWORKS\_JB\_000002369
- Jonesworks\_MN\_004: JONESWORKS\_MN\_000001535 - JONESWORKS\_MN\_000002868
- Jonesworks\_Wayfarer\_002: JONESWORKS\_WAYFARER\_000004668 - JONESWORKS\_WAYFARER\_000004672

It appears that at least hundreds of pages of documents are missing from your Abel production. This is a recurring problem with your productions. Please immediately produce any and all documents responsive to the August 11 and 15 Agreements (other than any Signal messages as noted above), including those noted in your email, by the **end of the day today**. Given that you agreed to give us these documents last week and apparently were prepared to do so, there is no good faith explanation for any additional delay. Moving forward, please include the bates ranges and production volume in all production letters so we can more promptly identify your production mistakes.

Additionally, on August 11 you agreed to produce any TAG agreements, and you agreed to do so by August 26, and then we subsequently agreed to your one-day extension request. We similarly expect the executed version(s) of the TAG/Wayfarer agreement no later than **tomorrow at 12 pm**. You represented you would produce this document to us in your August 11 Agreement on August 27. There is again no good faith reason to delay producing it almost two weeks after you agree to.

Finally, while we have tried to resolve our disputes in good faith, we cannot accept any further delay on your part in light of the upcoming deposition schedule. Provide your position on the non-responsive redactions noted in my email no later than **12 pm tomorrow**, and your amended ROG responses by **September 8**.

Best,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Sent:** Wednesday, September 3, 2025 2:49 PM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Elyn Garofalo

<[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>

**Subject:** RE: Jones v. Abel - Interrogatories

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Counsel:

This will confirm that the Wayfarer Parties searched the agreed-upon repositories of data, including iMessages, WhatsApp, and Signal. All non-privileged, responsive documents either have already been produced or will be produced (to the extent they exist) on or before the September 8, 2025 deadline set by the Court in the Lively action.

The RWA/Wayfarer agreements have already been produced (JONESWORKS\_JA\_000002477; JONESWORKS\_JA\_000002626; JONESWORKS\_JA\_000002662; JONESWORKS\_JA\_000002753). The executed version(s) of the TAG/Wayfarer agreement will be produced on or before September 8, 2025.

As for indemnification, given the pendency of the litigation, I am not aware of documents responsive to Jonesworks' indemnification-related requests other than legal invoices and her engagement agreement(s). We will produce the latter. Given that this and other related litigations are currently ongoing and considering the number of other Wayfarer Parties represented by LFTC and MSF, we are not prepared to produce invoices at this time.

We will reproduce the referenced redacted documents to replace black box redactions with text box redactions indicating the reason for the redaction by September 8, 2025. I will have to get back to you regarding our willingness to un-redact any of these documents.

As for the interrogatory responses, we are prepared to supplement Ms. Nathan's response to Interrogatory No. 18 to provide the amounts and dates of relevant payments. We are also willing to supplement Wayfarer's response to Interrogatory No. 18 to provide the amounts, dates of payment, and recipients. With respect to Interrogatory No. 24 to Ms. Abel, Jonesworks is seeking highly sensitive information as to clients with no relation to the claims or defenses in this case and outside the temporal scope of any purported restrictive covenants. We are not willing to provide such information. With respect to Interrogatory No. 17 to Wayfarer, the quantification Jonesworks is seeking is not readily obtainable and, for reasons both obvious and known to Jonesworks, calls for expert opinion. Wayfarer has listed lost and/or imperiled projects in response to other interrogatories, and we stand by Wayfarer's response in its present form. The other referenced interrogatories variously seek irrelevant information and/or are overbroad and compound. We intend to stand on our objections to those.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Sent:** Tuesday, September 2, 2025 4:27 PM

**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[btturnauer@lftcllp.com](mailto:btturnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>

**Subject:** RE: Jones v. Abel - Interrogatories

Counsel,

Thank you for the time earlier. As discussed, in our August 11 agreement, the Wayfarer Parties agreed that any “mobile” search would include iMessages, WhatsApp, and Signal messages. The Wayfarer Parties also agreed to produce “any agreements or contracts with or among Nathan, Baldoni, Wayfarer, TAG, and RWA” and “[a]ll engagement letters or agreements and invoices for any expenditures or losses (including attorneys’ fees) for which Abel seek indemnification, including legal bills, requests for retainer, and proof of payment.” You did not condition or limit your agreement to search for and produce those specific documents, nor have you previously raised any privilege concerns regarding Abel’s indemnification documents. Your August 27 production did not include any of these specific documents or any Signal or WhatsApp messages.

You represented on our conferral that you do not believe there are any agreements between Wayfarer or Baldoni and RWA or any executed agreements between Wayfarer or Baldoni and TAG. Regarding Abel’s indemnification documents, you represented that at present Abel seeks only legal fees—even though her complaint is not so limited—and that you would need to confirm your position on providing any engagement letter or similar documents, despite your prior agreement to produce those documents.

You further represented that you did not search Signal messages in advance of your August 27 production—despite your agreement to do so on August 11 and repeated subsequent confirmation that you would search for and produce documents in line with our agreement by August 27—because you cannot run search terms on Signal messages. You would not answer when you became aware that you could not run search terms on Signal, including whether you became aware before or after our August 11 agreement. Nor could you explain why you would agree to run search terms on Signal or repeatedly confirm that you would do so if you were aware you could not. You represented that you will now search for and produce Signal messages for documents responsive to the Jones Parties’ requests for production. We reiterate our view that your failure to do so before your August 27 production violated the parties’ prior agreements to search Signal messages.

On August 11, you also agreed to search WhatsApp messages but did not represent today that you cannot apply search terms to WhatsApp messages. Please immediately confirm that you ran the terms across WhatsApp or that you will search and produce responsive WhatsApp messages along with the Signal messages.

You further stood by your production as complete.

As discussed, by noon pt tomorrow, you will confirm the following:

1. That there are no agreements between Baldoni or Wayfarer and RWA or Abel
2. That there is no executed agreement between Baldoni or Wayfarer and Nathan or TAG
3. Whether you will produce “[a]ll engagement letters or agreements and invoices for any expenditures or losses (including attorneys’ fees) for which Abel seek indemnification, including legal bills, requests for retainer, and proof of payment” as agreed on August 15, including a date certain for the production of these documents
4. Written confirmation Abel seeks only legal fees for indemnification damages
5. The date certain you will produce Signal (and if not previously searched, WhatsApp) messages responsive to the Jones Parties’ requests
6. The date certain you will re-produce documents with ESI-compliant redactions
7. Whether you will remove or amend any non-responsive redactions to the specific list of documents in my August 29 email
8. Whether you stand by your objections or will agree to amend the specific ROG responses noted in my August 28 email

We will follow up regarding deposition scheduling, as discussed.

Best,  
Morgan

---

**From:** Morgan Anastasio

**Sent:** Friday, August 29, 2025 5:10 PM

**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[btturnauer@lftcllp.com](mailto:btturnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>

**Subject:** RE: Jones v. Abel - Interrogatories

Jason,

We are fine accommodating a 4 pm et conferral so you are able to join, but we do not understand how despite the Wayfarer Parties’ multiple attorneys across law firms, no one else is able or prepared to discuss your discovery obligations and agreements. It also is not entirely clear whether your latest emails confirms that you intended to produce documents from Wayfarer but inadvertently excluded them in your production or whether emails across other productions were excluded. Please confirm.

In addition to your ROG responses, we note your latest production is facially deficient (by a significant degree and in many respects) and we will need to discuss the following:

- Your Wayfarer production;
- The discrepancy in the number of documents produced vs. hit counts for our agreed terms, including documents concerning Mr. Wallace or Maverick;
- Your failure to produce any documents supporting Ms. Abel’s indemnification damages—including any engagement letters or agreements and invoices for any expenditures or losses (including attorneys’ fees) for which she seeks indemnification, such as invoices or proof of payment—despite your agreement to do so;

- Your failure to produce any contracts or agreements or negotiations thereof between RWA and Mr. Baldoni and/or Wayfarer, despite your agreement to do so;
- Your failure to produce any WhatsApp or Signal messages, despite your agreement to do so; and
- Overbroad and improper redactions, which appear to redact responsive information or otherwise violate the ESI protocol, including but not limited to:
  - JONESWORKS\_JA\_000001922
  - JONESWORKS\_JA\_000001933
  - JONESWORKS\_JA\_000001874
  - JONESWORKS\_MN\_000002595
  - JONESWORKS\_MN\_000002678
  - JONESWORKS\_MN\_000001575
  - JONESWORKS\_MN\_000001584
  - JONESWORKS\_MN\_000001876
  - JONESWORKS\_MN\_000002261
  - JONESWORKS\_MN\_000002636
  - JONESWORKS\_MN\_000000699
  - JONESWORKS\_MN\_000000842
  - JONESWORKS\_MN\_000000864

Regards,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Sent:** Friday, August 29, 2025 12:21 PM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Cc:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[btturnauer@lftcllp.com](mailto:btturnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>

**Subject:** Re: Jones v. Abel - Interrogatories

---

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

It will have to be later than 10 PST. I have a deposition starting at 7 am PST that will likely be ongoing. It's not a full day but probably more than 3 hours. How about 12 or 1 PST?

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285

[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from [ftllp.com](http://ftllp.com) to [lftcllp.com](http://lftcllp.com). Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

On Aug 29, 2025, at 3:51 AM, Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)> wrote:

Theresa,

We are fine accommodating a call on Tuesday at 10 am pt but expect our discussion to include both your ROG responses and recent production, as noted in our last email. To that end, please answer our outstanding yes or no question about whether you intended to make a production from Wayfarer no later than noon pt tomorrow. We reiterate our request for the hit report for our 8/15 agreement before we speak.

Thank you,  
Morgan

---

**From:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>  
**Sent:** Thursday, August 28, 2025 8:19 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Cc:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>  
**Subject:** Re: Jones v. Abel - Interrogatories

[EXTERNAL EMAIL from [ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)]

Counsel:

We are available at 2 pm Pacific tomorrow (Friday). However, we have a team member traveling internationally who will be available Tuesday but not tomorrow. If you would agree to a short extension of the 48 business hour window to accommodate a Tuesday morning call (we propose 10 am PT, just a few hours after the 48 business hour window would otherwise close), we think it will be a more productive call.

If you prefer not to extend the window, please circulate a dial-in or Zoom for 2 pm PT tomorrow.

Regards,  
Theresa Troupson

On Aug 28, 2025, at 6:44 AM, Morgan Anastasio  
<[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)> wrote:

Counsel,

We write in response to your August 18 interrogatory responses and objections, many of which are boilerplate and overbroad. These blanket objections lack merit, as the interrogatories seek discoverable information directly relevant to the claims and damages at issue. We are entitled to complete responses which must be provided forthwith. For example:

**Interrogatories Abel No. 24, Nathan Nos. 17-18, and Wayfarer Nos. 18 and 25** seek payments made and received for PR work related to the Film, and revenue/profits of RWA Communications and Wayfarer, which is relevant to the computation of damages, including lost business (\$100,000+ and \$45,500+ ongoing losses), lost investment deals (\$2 million+), and reputational harm. S.D.N.Y. Civ. R. 33.3(a) (permitting interrogatories seeking computation of each category of damage alleged).

**Interrogatories Baldoni No. 17 and Nathan Nos. 19-21** seek identities of individuals, including media members and TAG employees, with relevant information, which is directly relevant to the interactions forming the focus of significant portions of the Jones Parties' complaint (¶¶ 51-60, 66, 74, 76-91). S.D.N.Y. Civ. R. 33.3(a) (permitting interrogatories seeking names of witnesses with knowledge of information relevant to the subject matter).

**Interrogatory Wayfarer No. 17** seeks information regarding Wayfarer's claimed damages, which is relevant to Wayfarer's allegations of at least \$8 million in reputational damages as stated in its Second Amended Initial Disclosures. Your objection that this seeks premature expert opinion is invalid, given Wayfarer must have a reasonable factual basis for its damage allegations.

Let us know when you are available within 48 business hours to meet and confer on these issues.

Best,  
Morgan

**Morgan L. Anastasio**  
*Associate (she/her)*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

295 Fifth Avenue  
New York, NY 10016  
212-849-7021 Direct  
212-849-7000 Main Office Number  
212-849-7100 FAX

[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

# **EXHIBIT 10**

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Monday, August 11, 2025 5:00 PM  
**To:** Morgan Anastasio  
**Cc:** Nicholas Inns; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah; Kristin Tahler; Bryan Freedman; Ellyn Garofalo; Amir Kaltgrad; Kim Zeldin; Theresa Troupson; Summer Benson; Cortni Davis; Christina Puello; Local MS. Counsel; Local KAF. Counsel; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian  
**Subject:** RE: Jones v. Abel - Search Terms  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

---

Morgan,

We agree to apply these search terms.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from [fllp.com](http://fllp.com) to [lftcllp.com](http://lftcllp.com). Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Monday, August 11, 2025 10:24 AM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>;

mitra@ahouraianlaw.com; Rose Khatchikian <rkhatchikian@lftcllp.com>

**Subject:** RE: Jones v. Abel - Search Terms

Jason – see attached. I will revert on timing for the non-responsive redactions we discussed.

Thanks,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)>

**Sent:** Monday, August 11, 2025 1:01 PM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com);

[jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Kristin Tahler

<[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo

<[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson

<[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello

<[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>;

[mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>

**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)]

Morgan,

For clarity, can you please send a redline of the counter-proposal?

As discussed, we expect to make a supplemental production today or tomorrow that will include properly designated re-productions of the Wayfarer Parties' redactions, as well as the document corresponding to entry 310 on the Wayfarer Parties' privilege log.

When should we expect to receive the documents Jonesworks has agreed to un-redact?

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Monday, August 11, 2025 8:32 AM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkatchikian@lftcllp.com](mailto:rkatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Jason,

While we are okay with several of your edits, we cannot accept the following, which would exclude responsive information we either know exists or is highly likely to exist.

- Term 1: Removal of "Daily Mail," DM, Lillian, or Gissen
- Term 3 in full
- Terms 8, 9: Removal of Melissa Nathan as custodian

Removing your narrowing edits on these terms will also result in minimal additional burden to the Wayfarer Parties. Searching Melissa Nathan as a custodian for Term 9 and searching Term 3 as proposed by the Jones Parties, for instance, results in only approximately 600 total additional hits.

Given tomorrow's deadline, please let us know by 5 pm ET today whether you will agree to remove your narrowing edits to Terms 1, 3, 8, and 9 as specified above or we will consider the parties at an impasse on this issue and need to file a motion to compel.

Best,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Saturday, August 9, 2025 3:38 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkatchikian@lftcllp.com](mailto:rkatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

Attached are the hit reports. As before, these are designated "Confidential" under the protective order.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Friday, August 8, 2025 8:55 PM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Jason,

Please send us the corresponding hit report.

Thanks,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Friday, August 8, 2025 9:03 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

Attached is our counter-proposal. If these are acceptable, we will proceed.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fllp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Friday, August 8, 2025 12:21 PM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Thanks, Jason. You can use Kristin's /s/ and please just add (admission pending) for me.

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Friday, August 8, 2025 2:18 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

I've attached a proposed joint letter for your review and approval. Let me know whose /s/ should be inserted.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Friday, August 8, 2025 10:57 AM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Thanks, Jason. Please prepare a letter to that effect for our review.

Further to our discussions, we have taken another look at the non-responsive redactions noted below. The Jones Parties agree to remove the non-responsive redactions to Jonesworks\_00039444 at pages 1, 2, and 6, and will also adjust the non-responsive redaction to Jonesworks\_00040366 at page 2. The other redactions you point out are, as we discussed on our conferral, conversations related to Jonesworks' other business or otherwise not responsive or relevant to this action. The Jones Parties have similar questions about certain of the Wayfarer Parties' redactions but are not able to meaningfully evaluate your redactions until we receive your re-production with redactions compliant with the ESI protocol. To that end, we request your re-production by August 15. We also request the production of item 310 from the privilege log by Monday.

Regarding the privilege log, to prioritize the Wayfarer Parties' re-production and in light of your agreement to assess individual privilege log entries we may raise, without waiving any rights, we do not request the Wayfarer Parties add an additional column specifying the privilege holder at this time.

Thank you,  
Morgan

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Sent:** Friday, August 8, 2025 1:20 AM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Cc:** Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>

**Subject:** Re: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

We agree to a mutual extension until Tuesday.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from [fillp.com](http://fillp.com) to [lftcllp.com](http://lftcllp.com). Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

On Aug 7, 2025, at 7:37 PM, Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)> wrote:

Jason,

Thank you for the update. We can agree to a short extension, but a week is too long a delay given our need for responsive documents prior to the upcoming depositions. We will agree to an extension until Tuesday, with oppositions due Friday.

We will revert on the non-responsive redactions and privilege log in the morning.

Best,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Thursday, August 7, 2025 9:00 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>  
**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

We are still evaluating these terms and expect to have a counter-proposal tomorrow. I think it makes sense to jointly request a further 1-week extension of the motion to compel deadline so that we can continue to hash this out. I don't expect it to take nearly that long, but the looming deadline is an impediment. As indicated, we are willing to run additional terms; the only remaining issue is exactly which ones and across which data sets and custodians. Let me know if you agree.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Jason Sunshine  
**Sent:** Thursday, August 7, 2025 3:07 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler

<[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>

**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>

**Subject:** RE: Jones v. Abel - Search Terms

Morgan,

We are evaluating the terms with our vendor and will revert.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>

**Sent:** Thursday, August 7, 2025 2:28 PM

**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>

**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>

**Subject:** RE: Jones v. Abel - Search Terms

Thanks, Jason. To confirm, our proposal yesterday was to run term 1 across mobile only, and terms 5–7 across mobile only, so long as any agreements or contracts with or among Nathan, Baldoni, Wayfarer, TAG, and RWA are searched for and provided separately. It looks like those terms on the computer searches result in over 30,000 hits, but those should be excluded under our latest proposal.

For mobile searches, we would propose you run the August 6 search terms, but review only the parent text chain document for responsiveness, and produce it and its family if it is responsive,

which would reduce your review by over 17,000 documents. With those adjustments, that should bring the total to review to under 18,000, which we view as reasonable given the circumstances.

Confirming Jonesworks re-produced the documents produced to Vanzan in response to the subpoena, and that we ran search terms across Ms. Abel's phone and produced documents from her phone with metadata, pursuant to the ESI protocol, separate from the Vanzan documents.

We also are designating the proposed search terms sent to you on August 1 and August 6 as confidential pursuant to the protective order.

Thanks,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Sent:** Thursday, August 7, 2025 4:35 PM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>

**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Elyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>

**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

Thank you for the call this morning.

"Groups" are equivalent to "families," meaning they include attachments, gifs, etc. The hit reports for your new proposed search terms are still overly inclusive as would require a review of an additional approximately 65,000 documents. See attached (designated "Confidential" pursuant to the Protective Order).

We are working on a counterproposal to circulate.

You and Mr. Inns represented that in the bates range from 1-12,250, Jonesworks re-produced the documents Jonesworks produced to Vanzan in response to the subpoena using UFDC. You could not explain why Lively and Vanzan produced approximately 4,800 less pages. We will separately ask Lively's counsel and copy you on that communication.

You also advised that you applied search terms across Ms. Abel's phone for a separate, ESI Stipulation-compliant production and that all documents in the Vanzan production should therefore be included in Jonesworks 12,251-41,596. We will review the documents and get back to you.

We also await your follow-up regarding (i) Jonesworks' position on the challenged redactions identified in my previous email and (ii) whether Jonesworks stands by its request that the parties mutually modify their privilege logs to include an additional column specifying the privilege-holder.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Thursday, August 7, 2025 8:11 AM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>  
**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta BIRTHA <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puella <[cpuella@lftcllp.com](mailto:cpuella@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Jason,

Regarding your questions about the Jones Parties' privilege log:

1. [REDACTED] is employed at Quinn Emanuel; [REDACTED] is an independent consultant who Jonesworks considered retaining in connection with Ms. Abel's termination; and [REDACTED] and [REDACTED] were employees of Jonesworks at all relevant times.
2. [REDACTED] are consultants retained by Jonesworks at all times relevant to the privilege log.
3. [REDACTED] are consultants retained by Jonesworks at all times relevant to the privilege log.
4. That appears to be from a technical error in converting the document. The individuals for log #267 are the same as #266: [REDACTED] Stephanie Jones; [REDACTED] [REDACTED]; [REDACTED]
5. These messages reflect legal advice given to Jonesworks, and the privilege belongs to Jonesworks. The inclusion of Ms. Abel on these messages while she was employed at Jonesworks does not waive that privilege, nor make her entitled to these Jonesworks' privileged documents now. That is especially so given that Ms. Abel is now adverse to Jonesworks and

represented by the same counsel as several other individuals who were never entitled to any Jonesworks' privileged documents.

Talk soon,  
Morgan

---

**From:** Morgan Anastasio  
**Sent:** Thursday, August 7, 2025 8:54 AM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>  
**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Elyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkatchikian@lftcllp.com](mailto:rkatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Thanks, Jason, I'll send a zoom shortly.

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Wednesday, August 6, 2025 11:10 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>  
**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Elyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkatchikian@lftcllp.com](mailto:rkatchikian@lftcllp.com)>  
**Subject:** Re: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

We will review these new proposed terms and revert. I can confirm that we conducted a manual review where required by the ESI stipulation. Confirmed for tomorrow at 12 EST. Can you send a Zoom link?

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP

1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from [ftllp.com](http://ftllp.com) to [lftcllp.com](http://lftcllp.com). Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Wednesday, August 6, 2025 8:02:21 PM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com) <[matthew@umklaw.com](mailto:matthew@umklaw.com)>; [anthony@umklaw.com](mailto:anthony@umklaw.com) <[anthony@umklaw.com](mailto:anthony@umklaw.com)>; [jonas@umklaw.com](mailto:jonas@umklaw.com) <[jonas@umklaw.com](mailto:jonas@umklaw.com)>; Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>  
**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Elyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[btturnauer@lftcllp.com](mailto:btturnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com) <[mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Jason,

Thank you for the hit report. Based on the results, we identified the terms that appeared to be hitting on a large number of documents and have adjusted those terms and/or the scope of the custodial sources to be searched accordingly. That revised proposal is attached. Please let us know if you agree to this narrowing proposal or provide an updated hit report as soon as possible.

Regarding the mobile searches, can you please confirm what the "groups" are and whether they include photo attachments, icons, and the like?

We also await your confirmation on whether you conducted a manual search as required by the ESI protocol, which we initially requested by Friday August 1. It is not clear why the Wayfarer Parties have been unable to confirm they abided by the parties' agreement.

Acknowledging your agreement to re-produce the redacted documents with the designations as specified in the ESI Protocol and remove item 310 from the privilege log and produce the document.

We are available tomorrow at 12 pm et and will revert on the remaining issues before we speak. We are happy to discuss the Vanzan issue and well as Ms. Abel's phone on our call, though we again note that we produced the contents of Ms. Abel's phone to the extent they were responsive to other RFPs.

Best,

Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Sent:** Wednesday, August 6, 2025 8:48 PM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>

**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>

**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

Morgan,

This email responds to the remaining issues.

First, we will re-produce the redacted documents with the designations as specified in the ESI Protocol (i.e., non-responsiveness, privilege, personal identifying information, etc.).

Second, as to the privilege log, the Wayfarer Parties maintain that their log adequately apprises Jones and Jonesworks of the basis for each assertion of privilege and who is asserting it. It also bears emphasis that the format of the Wayfarer Parties' privilege log is substantially identical to that of Jones and Jonesworks. We are prepared to consider the inclusion of an additional column specifying who, precisely, is invoking the privilege, but we request that any such addition be mutual.

Third, we agree to remove item 310 from the privilege log and produce the document.

Separately, we still await your substantive response regarding the privilege log. Specifically, the Wayfarer Parties posed a number of questions regarding Jones and Jonesworks' assertions of privilege, including the identities and affiliations of [REDACTED] and [REDACTED]; when and by whom [REDACTED] and [REDACTED] were retained; and the basis for withholding or redacting communications that include Jennifer Abel, who is an adverse party.

Finally, you claim that Jonesworks produced pages 1-12,250 as PDFs because that is the way you produced them to Vanzan. If, in fact, you produced the documents as images to Vanzan and are merely producing exactly what Jonesworks produced to Vanzan, then the number of pages and the order of the documents should match up exactly. They do not. The number of pages in Vanzan's production and Lively's production was approximately 4,837 less than what Jonesworks says was produced to Vanzan. This makes no sense and perhaps can be cleared up by phone.

The documents and communications from Ms. Abel's phone are responsive not only to RFP No. 131 (relating to the Vanzan subpoena), but also to RFP Nos. 3, 4, 45, 47-52, 57-73, 84-87, 100, 102, 136-137,

139, 157, 159-164, 179, 181-182, 185, 187, 189, 192-192. As such, each of the documents produced in PDF must also be produced separately with the required ESI.

I am available to meet and confer tomorrow at 9 a.m. PST.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Jason Sunshine  
**Sent:** Wednesday, August 6, 2025 12:24 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>  
**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Morgan,

I've attached the "hit reports" of Jonesworks' proposed search terms. The Wayfarer Parties provide these documents—which are designated as "Confidential" pursuant to the protective order—without prejudice to their objections to the proposed terms which, as indicated, yield approximately 70,000 *additional* hits. I will revert back regarding the other issues by the close of business today and await a response concerning your clients' privilege log.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP

1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from ftllp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Wednesday, August 6, 2025 6:52 AM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>  
**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Jason,

**Search terms.** We again disagree with your recitation of the parties' history regarding search terms. After you raised search terms for the first time two weeks before the substantial completion deadline, we mutually agreed to re-visit search terms in the event one of our productions was deficient. For all the reasons in our July 18 letter and discussed on subsequent conferrals, the Wayfarer Parties' production both as of the July 1 substantial completion deadline and July 25 completion deadline is deficient. The Jones Parties did not wait to "rais[e] this issue a few days before motions to compel were due" as you claim, but in our July 18 letter when we requested that you run additional search terms in light of your deficient production. During our July 22 conferral, you refused to run or provide a hit report on the search terms proposed in our July 18 letter, but you later agreed to provide the search terms you ran if the Jones Parties provided the same. We agreed. We received your search terms on July 25, but did not receive your hit report on those terms until July 30—days past the parties' agreed deadline. The Jones Parties could not adequately assess your search terms without both those pieces of information, and once received we promptly conferred on July 31, during which time we raised the issues with the Wayfarer Parties' search terms noted in my August 1 email. That August 1 email included our proposal with substantially narrowed terms from our July 18 proposal. While we appreciate your offer to consider another proposal, as you know, we are not able to meaningfully evaluate our proposed terms based solely on an aggregate number, which is why we requested a hit report if you declined our proposal. We reiterate that request. Given that you already ran the terms and have a total hit number, sending that report should not be at all burdensome. Please therefore provide it no later than 5 pm ET today to ensure any meet and confer is productive.

We also reiterate our request you confirm that you conducted manual searches as required by the ESI protocol. Please do so by 5 pm ET today.

**Vanzan documents.** Regarding the documents at Bates range Jonesworks\_00000001 to Jonesworks\_00012250, that entire range are the documents that Jonesworks produced in response to the subpoena issued to it by Vanzan Inc, which includes text messages, email reports, and attached and embedded files including, for example, icons that, because of the way the documents were processed for production and to ensure a comprehensive production, were often imaged separately as family members of the text message threads of which they were part. Regarding the metadata, we are not entirely following what you are asking for. We have produced these documents in response to your request that Jonesworks produce its response to Vanzan's subpoena, so have produced them in the same format in which they were delivered to Vanzan. We do not now have a way to add metadata to those documents, especially where the Cellebrite report process used to generate them does not include metadata for the contents (because, for example, some of the reports include messages from numerous people spanning a period of time). Where the contents of the documents produced to Vanzan were also responsive to the Wayfarer Parties' discovery requests, we have already produced documents including that content in accordance with the ESI protocol. As just one example, JONESWORKS\_00013228 is the RSMF version with metadata (per the ESI protocol) of the messages in JONESWORKS\_00000001. We hope this resolves this issue.

**Redactions.** Your complaint about the Jones Parties' non-relevance redactions is curious given the Wayfarer Parties' ubiquitous redactions applied across their own productions and the terms of the stipulated and court-ordered ESI protocol, which expressly provide that the producing party "may redact the non-responsive material as provided herein and produce the responsive content" "[w]here a Document contains both responsive and non-responsive content," so long as "[a]ny non-responsive redactions shall be clearly indicated on the face of the Document with the redaction designation making clear the reason for the redaction (e.g., 'Redacted – NR')." ECF No. 67 IV(4). The redactions you highlight below were redacted as not responsive in accordance with the ESI Protocol. The Wayfarer Parties' redactions, in contrast, violate the ESI protocol, using black-box redactions with no distinction for privileged, non-responsive, or PII redactions. Please confirm the Wayfarer Parties will promptly remedy their improper redactions to comply with the ESI protocol.

**Privilege log.** Finally, as noted during our conferral, the Wayfarer Parties' privilege log—which purports to cover both the *Lively* and *Jones* actions and all your clients across those two actions—does not provide sufficient information for the Jones Parties to assess the claims of privilege. *Chevron Corp. v. Donziger*, 2013 WL 4045326, at \*2 (S.D.N.Y. Aug. 9, 2013) (Privilege logs must "provide [] information about the nature of the withheld documents sufficient to enable the receiving party to make an intelligent determination about the validity of the assertion of the privilege.") (cleaned up). When multiple defendants are involved, privilege logs must identify which defendant is asserting privilege over each document. *Sulaymu-Bey v. City of New York*, 372 F. Supp. 3d 90, 94 (E.D.N.Y. 2019) ("The failure to provide sufficiently descriptive information in a privilege log may result in a finding that the proponent of the privilege has not satisfied its burden.") (quoting *Certain Underwriters at Lloyd's v. Nat'l R.R. Passenger Corp.*, 2017 WL 1232526, at \*6 (E.D.N.Y. Feb. 17, 2017)); *Siegmund v. Xuelian Bian*, 2018 WL 3725775, at \*6 (S.D. Fla. Aug. 1, 2018) ("By failing to provide sufficient information to aid the Court in deciphering which party is asserting the privilege and what the contours of the communication are, Sidley has not carried its burden to show that the communications withheld are in fact privileged or protected."). Contrary to your statements during our conferral, the information regarding the participants on each communication is not sufficient to determine who is asserting the privilege over each of the 336

entries on the log. Despite this, certain entries appear to be patently improper, including entry 310 at least because it is not possible to tell who is asserting the privilege, but even if all were, as of September 16, 2024, there was no common interest among the listed individuals. To allow the Jones Parties to meaningfully assess this entry as well as your other claims of privilege, please promptly confirm for each entry you will identify the specific defendant(s) asserting privilege.

We will respond separately on your new questions regarding the Jones Parties' privilege log. We can be available to meet and confer tomorrow morning after we have received and have had time to review your hit report. Please let us know your availability.

Best,  
Morgan

---

**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>

**Sent:** Tuesday, August 5, 2025 9:45 PM

**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>

**Cc:** Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Rose Khatchikian <[rkhatichian@lftcllp.com](mailto:rkhatichian@lftcllp.com)>

**Subject:** RE: Jones v. Abel - Search Terms

[EXTERNAL EMAIL from [jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)]

---

Counsel:

We are reviewing Jones and Jonesworks' privilege log. To assist us in evaluating the assertions of privilege, please provide the following information:

1. The identities and affiliations of [REDACTED] (log #46), [REDACTED] (log #145), [REDACTED] (log #192-194; JONESWORKS\_00040299; JONESWORKS\_00040304; JONESWORKS\_00040312), and Marie Halliday (JONESWORKS\_00037311);
2. The date [REDACTED] and [REDACTED] were retained and who retained them;
3. The date when [REDACTED] were retained and by whom (log #146; JONESWORKS\_00038876);
4. Why no individuals are listed in log #267;
5. The basis for withholding or redacting communications that include Jennifer Abel who is a defendant and counterclaimant (#173-174; JONESWORKS\_00039602; JONESWORKS\_0003960; JONESWORKS\_00039631; JONESWORKS\_00037311).

Further, we are awaiting your response to yesterday's inquiry regarding Jonesworks' production, including the lack of metadata with respect to materials from Ms. Abel's phone and a substantial number of improper redactions based on purported non-responsiveness.

We also re-iterate our invitation to further meet and confer regarding, per your request, the application of additional search terms to obviate the need to file motions with the Court.

What is your availability tomorrow to meet and confer on the above?

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Jason Sunshine  
**Sent:** Monday, August 4, 2025 7:13 PM  
**To:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[burnauer@lftcllp.com](mailto:burnauer@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)  
**Cc:** Maaren Shah <[maarensah@quinnemanuel.com](mailto:maarensah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>  
**Subject:** RE: Jones v. Abel - Search Terms

Morgan,

This email follows our meet and confer email exchange last Thursday, July 31<sup>st</sup>.

As you recall, in June we asked you to meet and confer to agree to search terms that both parties would use to conduct the document review. You declined our invitation. On Thursday, July 31<sup>st</sup>, you provided us with search terms and asked us to conduct a search based on those terms; however, the terms you requested are too broad and disjunctive. These terms would require the review of around 70,000 additional documents. Given the Court's Case Management and Scheduling Order, which required the parties' final document production to be substantially completed by July 1, 2025 and completed by July

25, 2025 raising this issue a few days before motions to compel were due is unreasonable. We are, however, willing to consider a more reasonable proposal to conduct an additional search.

Separately and as previously stated, documents bates-labeled Jonesworks\_1 to 12250 do not have any metadata. You previously indicated that this is because that bates-range of documents includes the production of documents to Vanzan, which did not include metadata when produced to Vanzan. As requested, please provide the bates-numbers for the documents Jonesworks produced in response to the Vanzan subpoena (according to Lively this was no more than 7,315 pages). To the extent that documents falling within this bates-range were not documents produced to Vanzan, please provide us with the metadata for those documents. Further, produce all of the documents that were produced to Vanzan separately with its accompanying metadata. The fact that the documents were produced to Vanzan without metadata does not obviate the requirement that Jonesworks comply with the ESI stipulation in this case.

In addition, documents in Jonesworks' second production were improperly redacted as "non-responsive" or "NR," without further explanation. These documents include information about highly relevant topics including: Abel's telephone (Jonesworks 38969-70, 39445-46, 39449, and 40367-68), Wayfarer/Baldoni (39590-92, 40065) and Abel (39787). In the middle of such highly relevant documents, Jonesworks unilaterally removed information. In the Second Circuit, a party may not redact information from admittedly responsive and relevant documents "based on that party's unilateral determinations of relevancy." *Christine Asia Co. v. Alibaba Grp. Holding Ltd.*, 327 F.R.D. 52, 54 (S.D.N.Y. 2018) (citation omitted). Accordingly, please reproduce all documents Jonesworks unilaterally redacted (the list provided here is not exhaustive).

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
[REDACTED]  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from fillp.com to lftcllp.com. Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Morgan Anastasio <[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)>  
**Sent:** Friday, August 1, 2025 11:05 AM  
**To:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Rose Khatchikian <[rkhatchikian@lftcllp.com](mailto:rkhatchikian@lftcllp.com)>; [matthew@umklaw.com](mailto:matthew@umklaw.com); [anthony@umklaw.com](mailto:anthony@umklaw.com); [jonas@umklaw.com](mailto:jonas@umklaw.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Kim Zeldin <[kzeldin@lftcllp.com](mailto:kzeldin@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Tamar Yeghiayan <[tyeghiayan@lftcllp.com](mailto:tyeghiayan@lftcllp.com)>; Brian Turnauer <[btturnauer@lftcllp.com](mailto:btturnauer@lftcllp.com)>; Summer Benson

<[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Joanna Rivera <[jrivera@lftcllp.com](mailto:jrivera@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)

Cc: Maaren Shah <[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com)>; Kristin Tahler <[kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com)>; Nicholas Inns <[nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com)>

**Subject:** Jones v. Abel - Search Terms

Jason,

As discussed yesterday, please find attached our proposed search terms.

These modifications from and additions to the search terms you ran are necessary to identify documents responsive to the Requests for Production, all of which the Wayfarer Parties agreed to produce documents in response to. As discussed on our conferral, the search terms you ran in the first instance artificially limit the Wayfarer Parties' review and resulting production by identifying only documents that include an express reference to Stephanie Jones by her full name or Jonesworks. The document requests—and the Wayfarer Parties' responses to them—have no such limitation, nor is such a limitation reasonable. Overuse of quotation marks also likely excluded a large number of relevant documents. For example, only searching for full names within quotation marks excludes any reference to those same individuals by first name, nick name, or initials. Your use of quotation marks also effectively negated other several terms. For example, you included as search terms "termin\*" and "resign\*" which would not capture variations on those words (like terminating, terminated, resignation, or resigns, as the inclusion of \* is meant to do), but would only result in documents where the literal word termin\* or resign\* with the asterisk was used. Your search terms also did not include sufficient terms to capture documents responsive to all the Jones Parties' document requests. For example, and as we discussed, several requests seek documents related to solicitation of Jonesworks' clients. Despite text messages cited in the Jones Parties' complaint from Ms. Nathan to Ms. Abel stating "once you are gone – we will be on accounts together and make really good money" and "take this fucking client," you could not identify any search term used that would have captured these text messages or other discussions about taking Jonesworks' clients.

Accordingly, by EOD Monday, please confirm that you will run the search terms as in the attached or provide us with a counterproposal that addresses the issues noted above and that we discussed during our conferral, along with a hit count for both our attached proposal and your counter. Please also confirm by EOD today that you complied with the manual search requirements specified in the ESI protocol.

Thank you,  
Morgan

**Morgan L. Anastasio**  
*Associate (she/her)*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

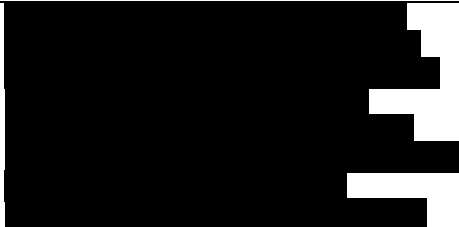
295 Fifth Avenue  
New York, NY 10016  
212-849-7021 Direct  
212-849-7000 Main Office Number  
212-849-7100 FAX  
[morgananastasio@quinnemanuel.com](mailto:morgananastasio@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader

of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

Term No.	Custodian(s)	Search Term
1	Jennifer Abel, Melissa Nathan, Justin Baldoni, Wayfarer Studios LLC	("Jonesworks" OR Jones OR SJ OR Steph* OR "JW") AND (employ* OR agreement OR contract OR confidential* OR loyal* OR non-compete OR non-solicit* OR solicit* OR poach* OR proprietary OR "business list" OR "marketing strategies" OR (marketing /2 strategy) OR depart* OR "last day" OR separat* OR resign* OR termin* OR leav* OR quit* OR fire* <del>OR "financial information"</del> OR RWA OR "The Agency Group PR LLC" OR “Agency Group” OR TAG OR Melissa OR Nathan OR Justin OR Baldoni OR [REDACTED] [REDACTED] OR Wayfarer <del>OR</del> [REDACTED] [REDACTED] [REDACTED] [REDACTED] Lively OR Blake OR BL OR MN OR <del>Melissa OR Nathan OR IEWU</del> OR “It Ends With Us”. <del>OR "Daily Mail" OR DM</del> [REDACTED]
2		Stephaniejoneslies OR stephaniejonesleaks OR hostinger OR Namecheap
3		(“Street Relations” -OR Jed OR Wallace) AND (campaign* OR bot* OR contract* OR agreement* OR pay* OR “Blake Lively” OR Steph* OR Jones OR “It Ends With Us” OR IEWU <del>-OR Reddit OR social*</del> OR post* <del>OR Reddit OR social* OR post*)</del> )
4	<del>Melissa Nathan</del> Justin Baldoni	(RWA OR Jen* OR Abel OR “rwacomunications.com”) AND ( <del>employ*</del> <del>OR agree</del> ment* OR contract OR terminat* <del>OR depart*</del> OR leav* OR quit* OR fire* OR

CONFIDENTIAL

	Wayfarer Studios LLC	confidential* OR loyal* OR non-compete OR compete OR non-solicit* OR solicit* OR pay* OR invoice OR "statement of work")	
5		(RWA OR Jen* OR Abel OR "rwacommunications.com") AND ( <del>erisis</del> OR <del>rep*</del> OR <del>PR</del> OR <del>press</del> OR <del>agreement</del> * OR contract* OR pay* OR engage* OR invoice OR <del>plan</del> OR <del>strateg</del> *)	<u>To be run across mobile, including iMessage, WhatsApp, and Signal, but not email, provided that any agreements or contracts with or among Nathan, Baldoni, Wayfarer, TAG, and RWA are searched for and provided separately</u>
6	Jennifer Abel Justin Baldoni Wayfarer Studios LLC	(TAG OR "Agency Group" OR MN OR Melissa OR "theagencygroup.com") AND (( <del>crisis</del> OR <del>rep*</del> OR <del>"PR"</del> OR <del>press</del> OR <del>agreement</del> * OR contract* OR pay* OR engage* OR invoice OR <del>plan</del> OR <del>strateg</del> *) OR (("Jonesworks" OR Jones OR SJ OR Steph* OR "JW") AND (pay* OR invoice)))	<u>To be run across mobile, including iMessage, WhatsApp, and Signal, but not email, provided that any agreements or contracts with or among Nathan, Baldoni, Wayfarer, TAG, and RWA are searched for and provided separately</u>
7	Jennifer Abel <del>Melissa</del> <del>Nathan</del>	(Wayfarer OR Justin OR Baldoni) AND ( <del>crisis</del> OR <del>represent*</del> OR <del>"PR"</del> OR <del>press</del> OR <del>agreement</del> * OR contract* OR <del>pay*</del> OR engage*)	<u>To be run across mobile, including iMessage, WhatsApp, and Signal, but not email, provided that any agreements or contracts with or among Nathan, Baldoni, Wayfarer, TAG, and RWA are searched for and provided separately</u>
8	Jennifer Abel <u>Melissa</u> <u>Nathan</u>	 (( <del>gone</del> OR <del>leav*</del> OR tak* OR poach*) /6 client*) OR (( <del>gone</del> OR <del>leav*</del> OR <del>tak*</del> OR poach*) /6 account*)	<u>To be run with narrowing edits on mobile, including iMessage, WhatsApp, and Signal, and computer</u>

Formatted Table

CONFIDENTIAL

9		<div>OR “Business Insider” OR BI</div>	<u>To be run for the time period before August 22, 2024, across mobile, including iMessage, WhatsApp, and Signal, and computer</u>
10	Jennifer Abel (before August 23, 2024)	RWA OR Maverick OR Mav* OR “rwacommunications.com”	<u>To be run as is across mobile, including iMessage, WhatsApp, and Signal, and computer</u>

CONFIDENTIAL

# **EXHIBIT 12**

## chat102364107824881770

**Thread Participants:** + [REDACTED] Jamev Heath; + [REDACTED] Tera Hanks; + [REDACTED] Justin B (Owner); + [REDACTED] Stephanie Jones

**Active Participants:** + [REDACTED] Stephanie Jones

**First Message:** 7/26/2024 7:57:52 PM

**Last Message:** 7/26/2024 7:57:52 PM

---

+ [REDACTED] **Stephanie Jones**

I just downloaded Tera on some dark stuff but please we cannot work with Melissa Nathan. there is a lot of dirty work she has done. very dirty. not someone we would want in justin's orb. or for blake's PR to use as weapon against him.

7/26/2024 7:57:52 PM

# **EXHIBIT 13**

## chat708570385575925766

**Thread Participants:** + [REDACTED] Tera Hanks McMaster (Owner); + [REDACTED]; + [REDACTED]  
Stephanie Jones; [REDACTED] Tera Hanks (Owner)

**Active Participants:** + [REDACTED]

**First Message:** 7/25/2024 7:01:41 PM

**Last Message:** 7/25/2024 7:01:41 PM

---

+ [REDACTED]  
Hi Tera, I know you and steph connected and she gave some recommendations but I want to make sure you guys have what you need to bring on a crisis comms team—we can be available to brief them and bring them up to speed. Happy to make calls too, let us know!

7/25/2024 7:01:41 PM

# **EXHIBIT 15**

## PR Thread w/TAG

Thread Participants: + [REDACTED] Jamey Heath; + [REDACTED] Jen Abel New number ;  
+ [REDACTED] Justin Baldoni ; + [REDACTED] Katie Case; + [REDACTED]  
Breanna Butler; + [REDACTED] Melissa Nathan (Owner); + [REDACTED]  
Matthew Mitchell; + [REDACTED] Jen Abel DO NOT USE;  
[REDACTED] (Owner)  
+ [REDACTED] Jamey Heath; + [REDACTED] Justin Baldoni ; + [REDACTED]  
Active Participants: Katie Case; + [REDACTED] Breanna Butler; + [REDACTED] Melissa Nathan  
(Owner); + [REDACTED] Jen Abel DO NOT USE  
First Message: 8/2/2024 8:52:48 AM  
Last Message: 8/2/2024 11:27:12 AM

+ [REDACTED] **Katie Case**

Hi all — as promised, sending our scenario planning document here before our call. Looking forward to discussing this in greater detail, and to the groups' thoughts and feedback. Thank you!



<\_\_Library\_SMS\_Attach\_1\_ff\_15\_7D9EB2\_1\_Wayfar\_1.pdf>

8/2/2024 8:52:48 AM

+ [REDACTED] **Justin Baldoni**

Just read

Please note this is my 3rd film as a director - not my first

8/2/2024 9:14:42 AM

+ [REDACTED] **Breanna Butler**

Yes, apologies making that correction

8/2/2024 9:21:47 AM

+ [REDACTED] **Katie Case**

Correction made here. Looking forward to running through this in greater detail shortly!



<\_\_Library\_SMS\_Attach\_1\_52\_02\_D7CF14\_1\_Wayfar\_1.pdf>

8/2/2024 9:23:22 AM

+ [REDACTED] **Justin Baldoni**

Hi guys, I'm running behind here.

Can we meet in 30 minutes

8/2/2024 10:57:47 AM

+ [REDACTED] **Melissa Nathan (Owner)**

I'm so sorry- I personally have a call 11:45am so 15 mins after we jump on.

I can kick off the call and then everyone else can stay on if that's okay and then if you want to call me later, I'm around all day just on my mobile ?

8/2/2024 10:59:50 AM

+ [REDACTED] **Jamey Heath**  
I'm in the zoom link but need to be let in  
8/2/2024 11:03:40 AM

+ [REDACTED] **Melissa Nathan (Owner)**  
We can start without Justin if that's ok? We jumped off  
the zoom.  
8/2/2024 11:04:05 AM

+ [REDACTED] **Jen Abel DO NOT USE**  
Yes let's do that  
8/2/2024 11:04:13 AM

+ [REDACTED] **Jamey Heath**  
Oh gotcha.  
8/2/2024 11:04:16 AM

+ [REDACTED] **Jen Abel DO NOT USE**  
I'm hopping on. Justin you can join when you're ready  
8/2/2024 11:04:24 AM

+ [REDACTED] **Justin Baldoni**  
The last surprise friend is just getting here who was  
delayed and I need to go get her  
8/2/2024 11:04:41 AM

+ [REDACTED] **Justin Baldoni**  
I'm sorry these time differences are really hard for me with  
everything im managing here  
8/2/2024 11:11:23 AM

+ [REDACTED] **Justin Baldoni**  
Can I get the zoom link  
8/2/2024 11:26:38 AM

+ [REDACTED] **Katie Case**  
Of course! Here you go:  
<https://us05web.zoom.us/j/7811215293?pwd=QWmlam6fYCW25Oi3VfQm6sHC74vhDW.1>  
(<https://us05web.zoom.us/j/7811215293?pwd=QWmlam6fYCW25Oi3VfQm6sHC74vhDW.1>)  
8/2/2024 11:27:12 AM

**\*\*CONFIDENTIAL\*\*****SCENARIO PLANNING – IT ENDS WITH US****OBJECTIVE**

Protect the reputation of Justin Baldoni, Jamey Heath, and Wayfarer Studios in the lead up, during, and following the premiere of It Ends with Us, underscore the achievement and efforts of the Wayfarer team in bringing this movie to life, and emphasize Justin and the studio's commitment to their team and making the broader industry a more inclusive space.

**OVERVIEW**

Though there are several potential scenarios at play here which we should be prepared for, should BL and her team make her grievances public – via a blatant story or subtle leak. Given she was made to compromise with the premiere, we feel she will move forward with doing so.

Our recommendation is to get ahead of this narrative, owning any misconceptions and addressing them head on. Ultimately, we need to be ready to take the air out of any story that does arise, as well as commentary and/or background narrative BL and her team put together, without being the louder antagonist.

The TAG team will continue to media monitor, flag, and respond to any media proactively reaching out / reporting on the issue and will send regular reports on existing chatter that may arise. Additionally, our team's digital experts will continue to monitor and flag any online content related to the crisis and/or mitigate if false narratives begin in the digital space.

**Crisis Mitigation and Rapid Response**

- Our team will establish a “rapid response” communication system which keeps Justin, Jamey, and Wayfarer Studios abreast of new coverage and narrative trends in real time, both in traditional media and social media.
- Alongside Jen Abel and her team, we will manage media inquiries regarding the news on background as “sources familiar.”
- Working with legal as appropriate, we will provide information to ensure our narrative is properly represented in any and all coverage.
- TAG will confirm outlets intending on covering the story, especially those impactful to Justin, Jamey, and Wayfarer's interests, are fully briefed on the situation including and not limited to The Hollywood Reporter, Variety, Deadline, The Wrap, New York Post, Daily Mail, etc.
- We will run real-time media monitoring reports with multiple daily updates on any coverage that arises and impact that the PR teams have had on stories.
- Further, we will produce daily sentiment reports which capture the reach and attitude of opinions online related to the issue and towards Justin, Jamey, and Wayfarer. These reports will also qualify the level of impact these stories have and the gradual decrease in interest post-crisis on this narrative.

**Preparation Materials:**

- Our team will develop clean, topline messaging outlining the facts in conjunction with Jen Abel and her team.
- Our team and Wayfarer Studios will discern what assets pertaining to communications, schedules, times when BL called out, etc. that we can share for off record and/or for context

purposes with journalists.

- Our team and Wayfarer Studios, alongside Jen Abel and team, will catalog third party advocates willing to provide a potential quote or engage with reporters on Justin and Jamey's behalf to mitigate negative narratives from a source outside of Wayfarer.
- Our team will collate a list of people who have publicly discussed their positive working experience with Justin – examples include Brandon Skylnar / Forbes, Colleen Hoover / Entertainment Weekly, etc.

#### **Key Messaging Points:**

- JB's stellar reputation among colleagues and industry peers - numerous quotes and interviews sharing positive experiences.
- JB has been a longtime activist and advocate of and for women in Hollywood, speaking out about challenges his colleagues faced before the Me Too movement even began (TED 2017).
- The "Man Enough" podcast has been a source of inspiration since it began, fostering a safe, encouraging environment for a range of perspectives to meet and discuss gender roles and how their rigidity affects everyone.
- While JB and JH attempted to foster a kind, safe, creative environment on set during a challenging period in Hollywood – resurgence of COVID-19, the writers strike, the SAG AFTRA strike – their efforts were continuously thrown back in their faces.
- Production members lost their jobs due to BL's takeover and insisted upon involvement – including loss of budget due to rescheduling shoot days when BL refused to show up.
- When BL wasn't able to get her way on set or behind the scenes, she involved her husband to create an imbalance of power between her and JB. RR went so far as to use his power to call agents and agencies, Sony, and other key players so that BL would get her way.
- BL's less than favorable reputation in the industry spans decades and has been reported – there were issues on Gossip Girl, the Town, A Simple Favor, and more.
- There is a clear, likely motive due to the film's value and fanbase, in which BL is attempting to bully her way into buying the rights for It Starts With Us.
- Our team will also include additional positive stats re: JB's career, his accolades, his inspiration to take on this project, obstacles he overcame, what's in store, etc.

#### **IF/THEN PLAN OF ACTION:**

##### **Scenario 1: Blake and team push out negative story re: Justin / Wayfarer post-premiere**

- Depending upon the scope of her push, we recommend planting a seed earlier on to position your truth / narrative around the ordeal in a subtle way to avoid having to backtrack.
- An idea for this, and working alongside Jen, is giving a friendly reporter who is covering the film a simple line hinting that while you and Blake didn't always agree at times "had our differences" you have respect for her. This way, if BL stories are softer, we don't look so aggressive. If it's a hit piece, then we've tee'd up reporters properly that there were issues with her. We would also ensure the story is broader, about the film, inspiration, etc. so that the line is one part of a larger piece.
- If her team is working on a longer lead, negative narrative, we would be given (a short) heads up in advance of the story and would, alongside Jen, correct inaccuracies in fact checking, mitigate false narratives, and point reporters toward third party advocates who can speak positively on your behalf.
- We would then brief people with a more robust version of the facts, executing a background approach, using third party advocates, and off record conversations with trusted friends to depict the truth of the situation. Targets would include popular industry newsletters (targeting industry peers, studio execs, investors, etc.) and social media (targeting JB's fanbase and those of

the novel/film) as well as trades / mainstream entertainment. Background information would include:

- Background briefing would clarify any misconceptions, what was taken out of context, and what can be chalked up to simple misunderstanding or miscommunication.
- Background briefing would highlight JB, JH, and Wayfarer's side of the story, what their truth is as it pertains to any allegations or negativity, facts based on the timeline, and issues they experienced on their end e.g. lost days of shooting, consistently adhering to demands, etc.
- Background briefing would include the fact that production members lost their jobs due to her involvement / takeover.
- Background briefing would include the numerous articles, interviews, and quotes of past colleagues who openly love working with Justin, and pointing to BL's less than favorable reputation of her twenty-year career.
- Background briefing would include pointing people to positive commentary, quotes, interviews from colleagues and peers of Justin praising his work, etc.

**Scenario 2: Blake subtly hints at her "experience" in post-premiere coverage, either in an interview, op ed, or otherwise.**

- Our prediction is that should BL address her "experience" on set in upcoming press, she will not name you directly but rather pepper in "easter eggs" alluding to your involvement, being mindful not to completely jeopardize her potential involvement with the film's sequel, while still planting seeds of doubt and speculation – especially amongst the passionate fan base.
- BL and her team have already begun to plant seeds around this, in insisting promotion be kept separate. Fans have already begun to speculate on socials that something is amiss.
- These pieces will likely come out following any potential hit piece and/or coverage from the premiere. Our recommended approach would be to provide reporters who reach out for comment, should it be obvious she's referring to you, with the appropriate background information (listed in Scenario 1) to ensure their stories are balanced and the speculation can be turned to another one of the many people she's had issues working with (Leighton Meester, Anna Kendrick, Ben Affleck, etc.).
- Additionally, we would advise taking further ownership of this narrative as an emerging director, lessons learned managing different egos, being the subject to an imbalance of power and/or navigating Hollywood, remaining dedicated throughout more challenging processes to protect the crew and production members, etc. – remaining strong but not specific or combative.
- This messaging can be woven into more positive press about the film, placed by Jen and team, so that you stay on the high road while sharing your truth in a respectful way. A subtle way to do this is to address some of the issues you faced on your podcast, and open the floor to discuss ways in which imbalances of Hollywood still need to be addressed, how teams can create safe environments for all cast and production members on set, etc.

**Scenario 3: Ryan comes forward in defense of his wife**

- Should Ryan come forward in defense of his wife, we would advise against any direct engagement, statement, etc.
- Inquiring reporters, and those in need of updating, would be given a pre-approved line of background, attributed to source, implying his lack of connection or involvement with the making of the film and that this is another imbalance of power and attempt to strongarm production by major A-list stars.
- Our team would also suggest (and will work with Jen Abel and her team on this) placing proactive interviews for Justin around the movie's debut, to speak to his first time directing, what it's like to produce, direct and star in a movie, the difference between being in charge and

being one of the cast, “lessons learned” from his first experience as a director, and what’s to come in the IEWU universe.

- This will get ahead of any potential negative news placed by BL and/or her team, and seed doubt should BL or RR come forward with negative messaging.
- As part of this, our team can also explore planting stories about the weaponization of feminism and how people in BL’s circle like Taylor Swift, have been accused of utilizing these tactics to “bully” into getting what they want.

**\*\*CONFIDENTIAL\*\*****SCENARIO PLANNING – IT ENDS WITH US****OBJECTIVE**

Protect the reputation of Justin Baldoni, Jamey Heath, and Wayfarer Studios in the lead up, during, and following the premiere of It Ends with Us, underscore the achievement and efforts of the Wayfarer team in bringing this movie to life, and emphasize Justin and the studio's commitment to their team and making the broader industry a more inclusive space.

**OVERVIEW**

Though there are several potential scenarios at play here which we should be prepared for, should BL and her team make her grievances public – via a blatant story or subtle leak. Given she was made to compromise with the premiere, we feel she will move forward with doing so.

Our recommendation is to get ahead of this narrative, owning any misconceptions and addressing them head on. Ultimately, we need to be ready to take the air out of any story that does arise, as well as commentary and/or background narrative BL and her team put together, without being the louder antagonist.

The TAG team will continue to media monitor, flag, and respond to any media proactively reaching out / reporting on the issue and will send regular reports on existing chatter that may arise. Additionally, our team's digital experts will continue to monitor and flag any online content related to the crisis and/or mitigate if false narratives begin in the digital space.

**Crisis Mitigation and Rapid Response**

- Our team will establish a “rapid response” communication system which keeps Justin, Jamey, and Wayfarer Studios abreast of new coverage and narrative trends in real time, both in traditional media and social media.
- Alongside Jen Abel and her team, we will manage media inquiries regarding the news on background as “sources familiar.”
- Working with legal as appropriate, we will provide information to ensure our narrative is properly represented in any and all coverage.
- TAG will confirm outlets intending on covering the story, especially those impactful to Justin, Jamey, and Wayfarer's interests, are fully briefed on the situation including and not limited to The Hollywood Reporter, Variety, Deadline, The Wrap, New York Post, Daily Mail, etc.
- We will run real-time media monitoring reports with multiple daily updates on any coverage that arises and impact that the PR teams have had on stories.
- Further, we will produce daily sentiment reports which capture the reach and attitude of opinions online related to the issue and towards Justin, Jamey, and Wayfarer. These reports will also qualify the level of impact these stories have and the gradual decrease in interest post-crisis on this narrative.

**Preparation Materials:**

- Our team will develop clean, topline messaging outlining the facts in conjunction with Jen Abel and her team.
- Our team and Wayfarer Studios will discern what assets pertaining to communications, schedules, times when BL called out, etc. that we can share for off record and/or for context

purposes with journalists.

- Our team and Wayfarer Studios, alongside Jen Abel and team, will catalog third party advocates willing to provide a potential quote or engage with reporters on Justin and Jamey's behalf to mitigate negative narratives from a source outside of Wayfarer.
- Our team will collate a list of people who have publicly discussed their positive working experience with Justin – examples include Brandon Skylnar / Forbes, Colleen Hoover / Entertainment Weekly, etc.

#### **Key Messaging Points:**

- JB's stellar reputation among colleagues and industry peers - numerous quotes and interviews sharing positive experiences.
- JB has been a longtime activist and advocate of and for women in Hollywood, speaking out about challenges his colleagues faced before the Me Too movement even began (TED 2017).
- The "Man Enough" podcast has been a source of inspiration since it began, fostering a safe, encouraging environment for a range of perspectives to meet and discuss gender roles and how their rigidity affects everyone.
- While JB and JH attempted to foster a kind, safe, creative environment on set during a challenging period in Hollywood – resurgence of COVID-19, the writers strike, the SAG AFTRA strike – their efforts were continuously thrown back in their faces.
- Production members lost their jobs due to BL's takeover and insisted upon involvement – including loss of budget due to rescheduling shoot days when BL refused to show up.
- When BL wasn't able to get her way on set or behind the scenes, she involved her husband to create an imbalance of power between her and JB. RR went so far as to use his power to call agents and agencies, Sony, and other key players so that BL would get her way.
- BL's less than favorable reputation in the industry spans decades and has been reported – there were issues on Gossip Girl, the Town, A Simple Favor, and more.
- There is a clear, likely motive due to the film's value and fanbase, in which BL is attempting to bully her way into buying the rights for It Starts With Us.
- Our team will also include additional positive stats re: JB's career, his accolades, his inspiration to take on this project, obstacles he overcame, what's in store, etc.

#### **IF/THEN PLAN OF ACTION:**

##### **Scenario 1: Blake and team push out negative story re: Justin / Wayfarer post-premiere**

- Depending upon the scope of her push, we recommend planting a seed earlier on to position your truth / narrative around the ordeal in a subtle way to avoid having to backtrack.
- An idea for this, and working alongside Jen, is giving a friendly reporter who is covering the film a simple line hinting that while you and Blake didn't always agree at times "had our differences" you have respect for her. This way, if BL stories are softer, we don't look so aggressive. If it's a hit piece, then we've tee'd up reporters properly that there were issues with her. We would also ensure the story is broader, about the film, inspiration, etc. so that the line is one part of a larger piece.
- If her team is working on a longer lead, negative narrative, we would be given (a short) heads up in advance of the story and would, alongside Jen, correct inaccuracies in fact checking, mitigate false narratives, and point reporters toward third party advocates who can speak positively on your behalf.
- We would then brief people with a more robust version of the facts, executing a background approach, using third party advocates, and off record conversations with trusted friends to depict the truth of the situation. Targets would include popular industry newsletters (targeting industry peers, studio execs, investors, etc.) and social media (targeting JB's fanbase and those of

the novel/film) as well as trades / mainstream entertainment. Background information would include:

- Background briefing would clarify any misconceptions, what was taken out of context, and what can be chalked up to simple misunderstanding or miscommunication.
- Background briefing would highlight JB, JH, and Wayfarer's side of the story, what their truth is as it pertains to any allegations or negativity, facts based on the timeline, and issues they experienced on their end e.g. lost days of shooting, consistently adhering to demands, etc.
- Background briefing would include the fact that production members lost their jobs due to her involvement / takeover.
- Background briefing would include the numerous articles, interviews, and quotes of past colleagues who openly love working with Justin, and pointing to BL's less than favorable reputation of her twenty-year career.
- Background briefing would include pointing people to positive commentary, quotes, interviews from colleagues and peers of Justin praising his work, etc.

**Scenario 2: Blake subtly hints at her "experience" in post-premiere coverage, either in an interview, op ed, or otherwise.**

- Our prediction is that should BL address her "experience" on set in upcoming press, she will not name you directly but rather pepper in "easter eggs" alluding to your involvement, being mindful not to completely jeopardize her potential involvement with the film's sequel, while still planting seeds of doubt and speculation – especially amongst the passionate fan base.
- BL and her team have already begun to plant seeds around this, in insisting promotion be kept separate. Fans have already begun to speculate on socials that something is amiss.
- These pieces will likely come out following any potential hit piece and/or coverage from the premiere. Our recommended approach would be to provide reporters who reach out for comment, should it be obvious she's referring to you, with the appropriate background information (listed in Scenario 1) to ensure their stories are balanced and the speculation can be turned to another one of the many people she's had issues working with (Leighton Meester, Anna Kendrick, Ben Affleck, etc.).
- Additionally, we would advise taking further ownership of this narrative as an emerging director, lessons learned managing different egos, being the subject to an imbalance of power and/or navigating Hollywood, remaining dedicated throughout more challenging processes to protect the crew and production members, etc. – remaining strong but not specific or combative.
- This messaging can be woven into more positive press about the film, placed by Jen and team, so that you stay on the high road while sharing your truth in a respectful way. A subtle way to do this is to address some of the issues you faced on your podcast, and open the floor to discuss ways in which imbalances of Hollywood still need to be addressed, how teams can create safe environments for all cast and production members on set, etc.

**Scenario 3: Ryan comes forward in defense of his wife**

- Should Ryan come forward in defense of his wife, we would advise against any direct engagement, statement, etc.
- Inquiring reporters, and those in need of updating, would be given a pre-approved line of background, attributed to source, implying his lack of connection or involvement with the making of the film and that this is another imbalance of power and attempt to strongarm production by major A-list stars.
- Our team would also suggest (and will work with Jen Abel and her team on this) placing proactive interviews for Justin around the movie's debut, to speak to his experiences directing, what it's like to produce, direct and star in a movie, the difference between being in charge and

being one of the cast, “lessons learned” from his experience as a director on this film and others, and what’s to come in the IEWU universe.

- This will get ahead of any potential negative news placed by BL and/or her team, and seed doubt should BL or RR come forward with negative messaging.
- As part of this, our team can also explore planting stories about the weaponization of feminism and how people in BL’s circle like Taylor Swift, have been accused of utilizing these tactics to “bully” into getting what they want.

# **EXHIBIT 19**

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 19	Date Range: 7/26/2024

Outline of Conversations

    chatroom • 19 messages on 7/26/2024 • Jen Abel  
() • Katherine Case () • Katie Case ()

**Messages in chronological order** (times are shown in GMT -04:00)**[REDACTED] 19047422954 [REDACTED] chatroom**

KC **Katie Case ([REDACTED])** 7/26/2024, 12:47 PM  
Just one quick private question — making sure I'm OK to send the SOW to your JW email?

JA **Jen Abel ([REDACTED])** 7/26/2024, 12:49 PM  
Send to Jennifer@rwacommunications.com

JA **Jen Abel ([REDACTED])** 7/26/2024, 12:49 PM  
Lol

JA **Jen Abel ([REDACTED])** 7/26/2024, 12:49 PM  
Im going to have Tera call Steph and let her know

JA **Jen Abel ([REDACTED])** 7/26/2024, 12:50 PM  
Then we can be above board

KC **Katie Case ([REDACTED])** 7/26/2024, 12:50 PM  
You got it!! I'm glad I double checked! And copy that!!

KC **Katie Case ([REDACTED])** 7/26/2024, 12:50 PM  
Just always like to check and then double check and then check again lol

JA **Jen Abel ([REDACTED])** 7/26/2024, 12:51 PM  
HAHAHA and that's why I adore you

KC **Katie Case ([REDACTED])** 7/26/2024, 12:51 PM  
We joke that the "P" in PR really stands for paranoid 🤪

JA **Jen Abel ([REDACTED])** 7/26/2024, 12:57 PM  
But it actually is lol

KC **Katie Case ([REDACTED])** 7/26/2024, 12:57 PM  
It's a joke but also not a joke at all lol

KC **Katie Case ([REDACTED])** 7/26/2024, 1:03 PM  
Sent!

JA **Jen Abel ([REDACTED])** 7/26/2024, 1:05 PM  
Hmmm hasn't come through yet

JA **Jen Abel ([REDACTED])** 7/26/2024, 1:07 PM  
Just got it!

KC **Katie Case ([REDACTED])** 7/26/2024, 1:07 PM  
Oh thank goodness I was worried my email was delayed 🙏 I was about to send to via text but PHEW crisis averted!

JA **Jen Abel ([REDACTED])** 7/26/2024, 1:30 PM  
OK few things... Every place that you say "We will work with Jen..." please swap that out with "We will work with JW..." since they are still clients of the company 😊. Also wherever you list Wayfarer, also please put "Justin Baldoni and Wayfarer and its applicable execs".

JA Jen Abel [REDACTED] 7/26/2024, 1:31 PM  
Everything else looks great. I also got the green light to send you those two documents so I'm sharing with you now

KC Katie Case [REDACTED] 7/26/2024, 1:32 PM  
You got it! I'll swap that out now and send! And amazing, thank you on all accounts!!

JA Jen Abel [REDACTED] 7/26/2024, 1:33 PM  
Loved "You got it! I'll swap that out now and send! And a..."

# **EXHIBIT 23**

**From:** Jamey Heath <[REDACTED]>  
**Sent:** Fri, 9 Aug 2024 16:04:39 -0400 (EDT)  
**To:** Jed Wallace <[REDACTED]>  
**Cc:** Laura Voglesong <[REDACTED]>; Imene Meziane <[REDACTED]>; Brian Singer <[REDACTED]>; Katie Case <[REDACTED]>; Melissa N <[REDACTED]>; Mitz Toskovic <[REDACTED]>  
**Subject:** Re: Jamey/ Jed

---

Hi all.  
Confirming that I spoke with JP Morgan and wire has been approved. Should be to you any time.

Thanks all.  
Jamey

Jed, let's set up a time for us to catch up please.  
Thank you much.



**Jamey Heath**  
CEO  
Wayfarer Studios  
[REDACTED]

On Aug 9, 2024, at 1:41 PM, Jed Wallace <[REDACTED]> wrote:

Thank you again, Laura!

Jed Wallace  
Founder  
**Street Relations, Inc.**  
[REDACTED]

On Aug 9, 2024, at 1:28 PM, Laura Voglesong <[REDACTED]> wrote:

Thank you everyone!

I've spoken with Jed and confirmed the wire transfer information. The invoice will be processed ASAP.

Any questions, please let me know.

Thank you,  
Laura

On Fri, Aug 9, 2024 at 11:17 AM Jed Wallace <[REDACTED]> wrote:  
Wayfarer Family!!!

I'm so sorry for the delayed response, just wrapped a long flight but my team is/has been in full throttle mode on our Wayfarer focus!

In the meantime, We will work in lockstep with TAG, but engaged separately. Attached is a W9 and happy to confirm wiring details ([REDACTED]).

Looking forward to working some magic with the Wayfarer team, et al.

Jed Wallace  
Founder  
**Street Relations, Inc.**  
[REDACTED]

On Aug 9, 2024, at 1:04 PM, Imene Meziane <[REDACTED]> wrote:

Nice to e-meet you Jed.

In addition to Brian's email, confirming that this falls under our agreement with The Agency Group ("TAG") and that TAG is subcontracting Street Relations?

Please advise asap. Thanks,

Imene Meziane

On Fri, Aug 9, 2024 at 11:02 AM Brian Singer <[REDACTED]> wrote:

Team,

Can you please 1) forward a w9 along with 2) a name and phone number that either myself or our Controller, Laura can call ASAP to verbally confirm wire instructions?

Many thanks,

Brian

On Fri, Aug 9, 2024 at 12:45 AM Jamey Heath <[REDACTED]> wrote:

Adding attachment



**Jamey Heath**  
CEO  
Wayfarer Studios  
[REDACTED]

On Aug 9, 2024, at 2:41 AM, Jamey Heath <[REDACTED]> wrote:

Hi Jed,  
Wonderful to meet you.

I apologize for the delay. The premier and screening we had today has been just crazy time.

We are happy to have you on board.

As for the invoice, I'm adding my team to get into this and have you taken care of asap.

Please meet, Brian, imene and mitz.  
Our CFO, our Head of Legal and our VP of Operations respectively. Please rest assured we will get you squared up.

Team Wayfarer, please prioritize this.

Thank you all,

Jamey



**Jamey Heath**  
CEO  
Wayfarer Studios  
[REDACTED]

On Aug 8, 2024, at 1:11 PM, Jed Wallace <[REDACTED]> wrote:

Thank you for the connecting point, Katie!

Jamey, an absolute pleasure. While the circumstances are the circumstances, this is our wheelhouse and have it prioritized across all platform-specific specialists working for me.

Jed Wallace  
Founder  
**Street Relations, Inc.**  
[REDACTED]

On Aug 8, 2024, at 1:08 PM, Katie Case <[REDACTED]> wrote:

To quickly follow up as I know we want to work as fast as possible -- I've attached an invoice from Street Relations, as discussed.

And to echo Melissa, Jed and his team are truly the best of the best! So happy we could make this connection.

On Thu, Aug 8, 2024 at 11:01 AM Melissa N <[REDACTED]> wrote:

Hi Jamey,

Please meet Jed who will be having his team assist on all social activity based off our own conversations as well as their digital plan you are in receipt of.

He is aware we are going for their Quote two option for \$30,000 PM for 3 months

Jed and team has worked on some of the most monumental BTS projects globally and I'm extremely happy to make this intro between you both.

Jen/ Matthew and TAG team will be working alongside side them of course but, you both should find a few mins to connect around the project as well as payment.

Thanks so much  
Melissa

Sent from my iPhone

<Tag.WS.JB\_Digital\_Consulting\_Project (1).pdf>

--

Laura Voglesong  
Controller, Wayfarer Studios

# **EXHIBIT 28**

chat937230947598623527

Thread Participants: [REDACTED] Jamey Heath (Owner); [REDACTED] Tera Hanks;  
+ [REDACTED] Jamey Heath (Owner)  
Active Participants: + [REDACTED] Jamey Heath (Owner); + [REDACTED] Tera Hanks;  
+ [REDACTED]  
First Message: 8/14/2024 12:02:21 AM  
Last Message: 8/14/2024 11:56:14 PM

---

+ [REDACTED]  
📎 <\_\_Library\_SMS\_Attachments\_23\_03\_CE50B022-86F3-4E2C-A155-80C89937A4A2\_Audio Message.caf>  
8/14/2024 12:02:21 AM

+ [REDACTED] Tera Hanks  
Thanks Jenn  
All makes perfect sense  
8/14/2024 12:07:18 AM

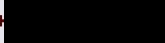


+ [REDACTED] Jamey Heath (Owner)  
I don't like the idea that there is continued cannibalization from within the same side. Meaning "Jonesworks" ie Stephanie, and the Crisis team. I only want us to be communicating with people who are working together and not with ones who are undermining others within our team. Stephanie is casting doubt and that can have an affect like poison.  
  
I'm going to bed. A first for me in forever.  
Let's chat more tomorrow about this.  
8/14/2024 12:15:05 AM

+ [REDACTED]  
Loved "I don't like the idea that there is continued cann..."  
8/14/2024 12:18:46 AM

+ [REDACTED] Tera Hanks  
<https://www.hollywoodreporter.com/movies/movie-news/it-ends-with-us-sony-blake-lively-1235974889/>  
📎 <\_\_Library\_SMS\_Attach\_1\_0e\_14\_04ADFA\_1\_1EA06D\_1>  
📎 <\_\_Library\_SMS\_Attach\_1\_fc\_12\_7AC20E\_1\_73F325\_1>  
8/14/2024 10:55:04 PM

+ [REDACTED]  
Thanks Tera. So bummed by this and the lack of support for Justin. But we forge ahead.  
8/14/2024 11:49:00 PM

+ [REDACTED]  
But look at the comments...  
8/14/2024 11:56:12 PM

   
<https://x.com/thr/status/1823903545105768759?s=46&t=I>  
Call20h75OB3Ad6Pnd3Sw  
  
<\_\_Library\_SMS\_Attach\_1\_12\_02\_D31420\_1\_08EAD2\_1  
>

8/14/2024 11:56:14 PM


# **EXHIBIT 30**

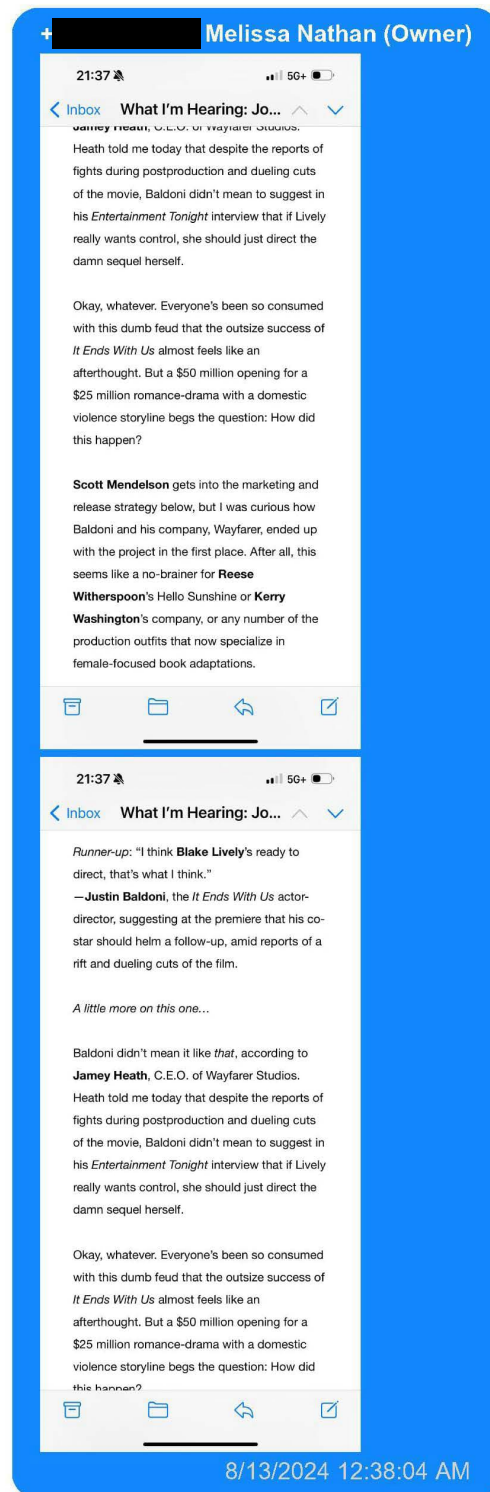
+ [REDACTED]

**Thread Participants:** + [REDACTED] Melissa Nathan (Owner); + [REDACTED] Jen Abel DO NOT USE  
**Active Participants:** + [REDACTED] Melissa Nathan (Owner); + [REDACTED] Jen Abel DO NOT USE  
**First Message:** 8/13/2024 12:03:29 AM  
**Last Message:** 8/13/2024 11:59:44 PM

---

+ [REDACTED] Melissa Nathan (Owner)  
Same  
8/13/2024 12:03:29 AM

+ [REDACTED] Melissa Nathan (Owner)  
 <\_\_Library\_SMS\_Attach\_1\_8c\_12\_252D94\_1\_Bryan\_1.vcf>  
8/13/2024 12:03:58 AM



+ [REDACTED] Jen Abel DO NOT USE  
Yeah I told him on record he could clarify  
8/13/2024 12:38:49 AM

+ [REDACTED] Melissa Nathan (Owner)  
As a PR for them and you - this is fabulous  
8/13/2024 12:38:52 AM

+ [REDACTED] Jen Abel DO NOT USE  
:)  
8/13/2024 12:38:58 AM

+ [REDACTED] Melissa Nathan (Owner)  
As Leslie - go fuck yourselves  
8/13/2024 12:39:03 AM

+ [REDACTED] Jen Abel DO NOT USE  
And thank you haha  
8/13/2024 12:39:05 AM

+ [REDACTED] Melissa Nathan (Owner)  
Taking off xoxo  
8/13/2024 12:39:26 AM

+ [REDACTED] Jen Abel DO NOT USE  
Fly safe!!  
8/13/2024 12:39:50 AM

+ [REDACTED] Melissa Nathan (Owner)  
  
8/13/2024 12:40:31 AM

+ [REDACTED] Melissa Nathan (Owner)  
Any word on statement ?  
8/13/2024 11:29:35 AM

+ [REDACTED] Jen Abel DO NOT USE  
A big giant fuck you no  
8/13/2024 11:52:03 AM

+ [REDACTED] Jen Abel DO NOT USE  
Thank fucking god  
8/13/2024 11:52:53 AM

+ [REDACTED] Jen Abel DO NOT USE  
We are going to war  
8/13/2024 11:52:57 AM

+ [REDACTED] Jen Abel DO NOT USE  
I feel so alive hahahahah  
8/13/2024 11:53:03 AM

+ [REDACTED] Melissa Nathan (Owner)  
Going out of JW with a BANG  
8/13/2024 11:54:20 AM

+ [REDACTED] Melissa Nathan (Owner)  
bf is in mediation by the way I asked his asst  
8/13/2024 12:30:50 PM

+ [REDACTED] Jen Abel DO NOT USE  
Ok copy  
8/13/2024 12:31:00 PM

+ [REDACTED] Melissa Nathan (Owner)

Am listing this: Blake Lively was given final edit approval on "It Ends With Us" to make the movie more "feminine", according to sources. The star - and the rest of the cast - are not speaking to director and co-star Justin Baldoni, and Brandon Sklenar particularly has a problem with him over, we're told. Although not greenlit, as we predicted, there will now be a battle over the sequel, "It Starts With Us", as Baldoni owns the rights to the film, but due to the rift with Lively it's unknown what will happen yet. A source said, "There were two edits and the studio went with a more feminine edit. Blake had the right to do that she had final edit approval."

8/13/2024 1:32:29 PM

+ [REDACTED] Melissa Nathan (Owner)

NYP- Leslie placed

8/13/2024 1:32:42 PM

+ [REDACTED] Jen Abel DO NOT USE

It was not a more feminine edit

8/13/2024 1:33:13 PM

+ [REDACTED] Jen Abel DO NOT USE

It was just a different edit

8/13/2024 1:33:19 PM

+ [REDACTED] Jen Abel DO NOT USE

Leslie is working overtime

8/13/2024 1:33:43 PM

+ [REDACTED] Melissa Nathan (Owner)

She really is.

8/13/2024 1:33:47 PM

+ [REDACTED] Melissa Nathan (Owner)

But I don't think she wanted to.

8/13/2024 1:33:52 PM

+ [REDACTED] Jen Abel DO NOT USE

Have to remove more feminine edit

8/13/2024 1:34:03 PM

+ [REDACTED] Jen Abel DO NOT USE

It was just a different edit

8/13/2024 1:34:12 PM

+ [REDACTED] Jen Abel DO NOT USE

And she wasn't given final edit approval, she said she wouldn't promote the film if it wasn't one that she could personally get behind... ie, if it wasn't her edit. Even though Justin's scored higher in their focus group screenings.

8/13/2024 1:36:11 PM

+ [REDACTED] Jen Abel DO NOT USE  
So that's the fact. However you want to spin it lol  
8/13/2024 1:36:28 PM

+ [REDACTED] Melissa Nathan (Owner)  
This is what I think we should do.  
8/13/2024 1:37:13 PM

+ [REDACTED] Jen Abel DO NOT USE  
Can we say, "sources say Justin understood how important it was to have Blake support the film so he and Wayfarer gave the OK for her to have her say in the final edit"  
8/13/2024 1:37:26 PM

+ [REDACTED] Jen Abel DO NOT USE  
Or is that too much  
8/13/2024 1:37:29 PM

+ [REDACTED] Melissa Nathan (Owner)  
I'm just on zoom but call sara and go thru or wait for me to do as well?  
As she has to give us the opportunity to comment  
8/13/2024 1:37:51 PM

+ [REDACTED] Jen Abel DO NOT USE  
"Her say in the final edit to ensure it had the proper female gaze when telling Lily's story"  
8/13/2024 1:37:54 PM

+ [REDACTED] Jen Abel DO NOT USE  
I can call her  
8/13/2024 1:38:04 PM

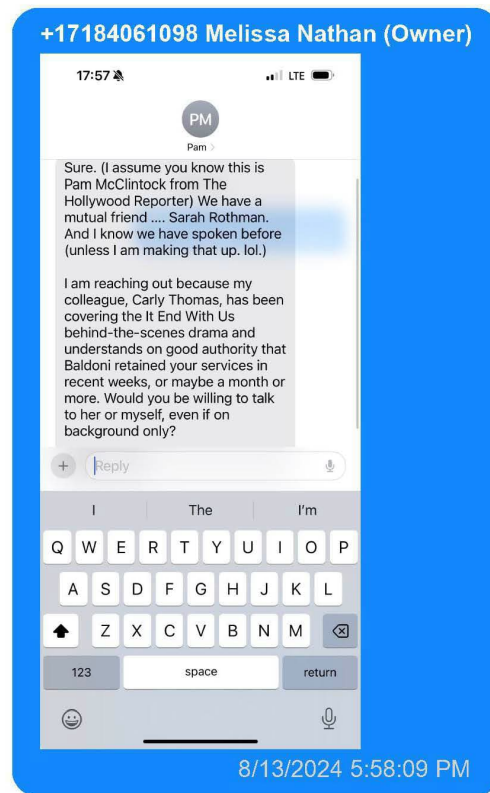
+ [REDACTED] Jen Abel DO NOT USE  
Unless you want to be on  
8/13/2024 1:38:09 PM

+ [REDACTED] Melissa Nathan (Owner)  
No  
8/13/2024 1:38:12 PM

+ [REDACTED] Melissa Nathan (Owner)  
Told her to call you lol  
8/13/2024 1:38:19 PM

+ [REDACTED] Melissa Nathan (Owner)  
This shit is absurd what Leslie is doing  
8/13/2024 1:38:27 PM

+ [REDACTED] Melissa Nathan (Owner)  
Don't love the shirtless thing right now tbh  
8/13/2024 2:56:53 PM



+ [REDACTED] Jen Abel DO NOT USE

Oh hell no

8/13/2024 5:58:53 PM

+ [REDACTED] Melissa Nathan (Owner)

For fuck's sake

8/13/2024 5:59:03 PM

+ [REDACTED] Jen Abel DO NOT USE

Come on

8/13/2024 6:00:03 PM

+ [REDACTED] Jen Abel DO NOT USE

No

8/13/2024 6:00:05 PM

+ [REDACTED] Melissa Nathan (Owner)

Ready for Bryan?

8/13/2024 6:38:46 PM

+ [REDACTED] Jen Abel DO NOT USE

Yes

8/13/2024 6:38:51 PM

+ [REDACTED] Jen Abel DO NOT USE

I'll call Jamey back

8/13/2024 6:38:58 PM

+ [REDACTED] Jen Abel DO NOT USE

Want to call me with him

8/13/2024 6:39:08 PM

+ [REDACTED] Jen Abel DO NOT USE  
?

8/13/2024 6:39:36 PM

+ [REDACTED] Melissa Nathan (Owner)  
Calling now.

8/13/2024 6:39:56 PM

+ [REDACTED] Melissa Nathan (Owner)  
<https://www.hollywoodreporter.com/movies/movie-news/justin-baldoni-hires-pr-crisis-manager-melissa-nathan-it-ends-with-us-1235973715/>



<\_\_Library\_SMS\_Attach\_1\_ec\_12\_C872FA\_1\_A1D175\_1  
>



<\_\_Library\_SMS\_Attach\_1\_52\_02\_134E92\_1\_A49B03\_1  
>

8/13/2024 8:29:40 PM

+ [REDACTED] Jen Abel DO NOT USE  
Wow

8/13/2024 8:30:34 PM

+ [REDACTED] Jen Abel DO NOT USE  
Fuck

8/13/2024 8:30:43 PM

+ [REDACTED] Jen Abel DO NOT USE  
What can we do about this

8/13/2024 8:30:48 PM

+ [REDACTED] Melissa Nathan (Owner)  
Am so fucking mad men

8/13/2024 8:30:55 PM

+ [REDACTED] Melissa Nathan (Owner)  
Jen

8/13/2024 8:30:57 PM

+ [REDACTED] Melissa Nathan (Owner)  
I'm so fucking angry

8/13/2024 8:31:01 PM

+ [REDACTED] Jen Abel DO NOT USE  
I just know Steph is going to weaponize this

8/13/2024 8:31:05 PM

+ [REDACTED] Melissa Nathan (Owner)  
I know

8/13/2024 8:31:09 PM

+ [REDACTED] Jen Abel DO NOT USE  
But holy fuck

8/13/2024 8:31:12 PM

+ [REDACTED] Jen Abel DO NOT USE  
I can't believe they wrote that story  
8/13/2024 8:31:24 PM

+ [REDACTED] Melissa Nathan (Owner)  
Same  
8/13/2024 8:31:28 PM

+ [REDACTED] Jen Abel DO NOT USE  
At least it doesn't mention scooter but still  
8/13/2024 8:31:49 PM

+ [REDACTED] Jen Abel DO NOT USE  
Jamey is still on with Ashley  
8/13/2024 8:31:57 PM

+ [REDACTED] Melissa Nathan (Owner)  
He's being attacked publicly, he brought on an expert to  
help end of day  
8/13/2024 8:32:10 PM

+ [REDACTED] Melissa Nathan (Owner)  
I'm sorry :( she's a fucking bitch  
8/13/2024 8:32:18 PM

+ [REDACTED] Melissa Nathan (Owner)  
She's a fucking fucking bitch  
8/13/2024 8:32:25 PM

+ [REDACTED] Jen Abel DO NOT USE  
Do you think this makes him look guilty though. Honestly.  
8/13/2024 8:33:55 PM

+ [REDACTED] Jen Abel DO NOT USE  
Nothing against you AT ALL  
8/13/2024 8:34:02 PM

+ [REDACTED] Jen Abel DO NOT USE  
But honest opinion  
8/13/2024 8:34:07 PM

+ [REDACTED] Melissa Nathan (Owner)  
Honestly no.  
  
Everyone hires crisis- Leslie is crisis.  
  
If it wasn't me , whoever you would have hired would have  
been also mentioned as she used as a tactic.  
  
It's trades as well - fans don't read trades.  
8/13/2024 8:37:05 PM

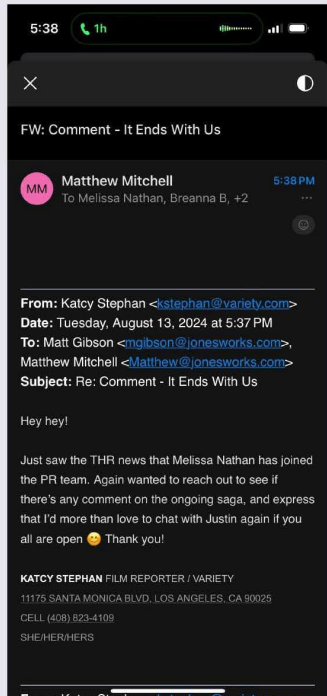
+ [REDACTED] Jen Abel DO NOT USE  
Ok thx. That's what I think too but wanted your opinion  
8/13/2024 8:37:29 PM

+ [REDACTED] Melissa Nathan (Owner)

Call me after. At least the Ashley call is going well ?

8/13/2024 8:38:14 PM

+ [REDACTED] Jen Abel DO NOT USE



8/13/2024 8:39:04 PM

+ [REDACTED] Jen Abel DO NOT USE

Jamey saw the article and doesn't care. He says it says "nothing" just that we retained her for crisis. And I'm like yeah, that's all melissa she's really good.

8/13/2024 8:52:46 PM

+ [REDACTED] Jen Abel DO NOT USE

So he doesn't care

8/13/2024 8:52:49 PM

+ [REDACTED] Jen Abel DO NOT USE

Fuck you leslie

8/13/2024 8:52:52 PM

+ [REDACTED] Melissa Nathan (Owner)

Also we rep amazing people too not just the people in trouble

SJ has repped MANY MANY men that have done terrible things that I've even helped her fix

You can't win in this biz

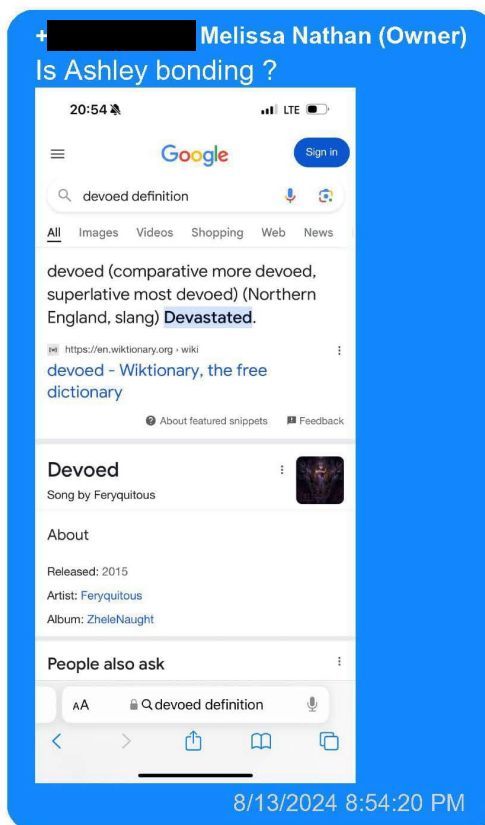
8/13/2024 8:53:25 PM

+ [REDACTED] Melissa Nathan (Owner)

Oh thank god I feel so bad I put you in any situation.

Devoed

8/13/2024 8:53:57 PM



+ [REDACTED] Jen Abel DO NOT USE  
Laughed at an image  
8/13/2024 8:54:30 PM

+ [REDACTED] Jen Abel DO NOT USE  
Yes she's so good  
8/13/2024 8:54:34 PM

+ [REDACTED] Jen Abel DO NOT USE  
Love her already  
8/13/2024 8:54:39 PM

+ [REDACTED] Jen Abel DO NOT USE  
God THR put out a breaking news blast  
8/13/2024 8:54:53 PM

+ [REDACTED] Melissa Nathan (Owner)  
Oh good 😊😊  
And you gotta meet her for lunch  
8/13/2024 8:54:56 PM

+ [REDACTED] Melissa Nathan (Owner)  
I know .  
8/13/2024 8:54:59 PM

+ [REDACTED] Jen Abel DO NOT USE  
Like wtf really?  
8/13/2024 8:55:04 PM

+ [REDACTED] Jen Abel DO NOT USE  
A breaking news blast  
8/13/2024 8:55:10 PM

+ [REDACTED] Jen Abel DO NOT USE  
What the hell  
8/13/2024 8:55:14 PM

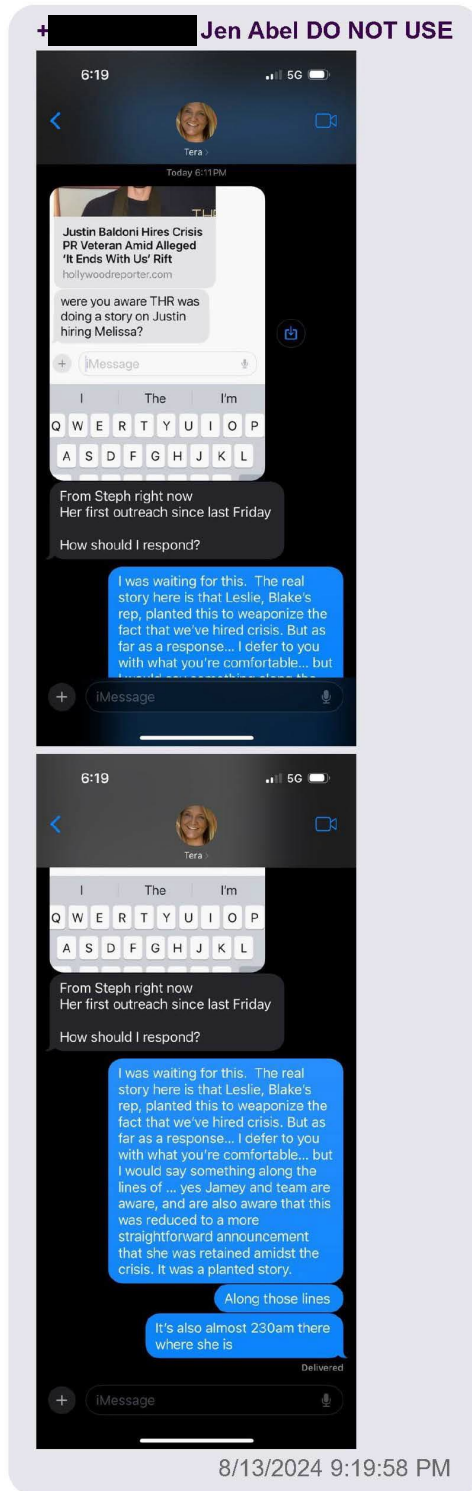
+ [REDACTED] Melissa Nathan (Owner)  
I was texting you and it came up as a breaking news  
Breaking . News .  
8/13/2024 8:55:26 PM

+ [REDACTED] Jen Abel DO NOT USE  
I'm now worried what Steph is going to say. Not that they  
care AT ALL. But she is going to try to use this in some  
capacity  
8/13/2024 8:56:30 PM

+ [REDACTED] Melissa Nathan (Owner)  
She absolutely will. But also  
Let's compare stories stephanie  
8/13/2024 8:59:00 PM

+ [REDACTED] Melissa Nathan (Owner)  
When Bi drops  
8/13/2024 8:59:04 PM

+ [REDACTED] Jen Abel DO NOT USE  
And Steph just texted Tera lol  
8/13/2024 9:19:30 PM

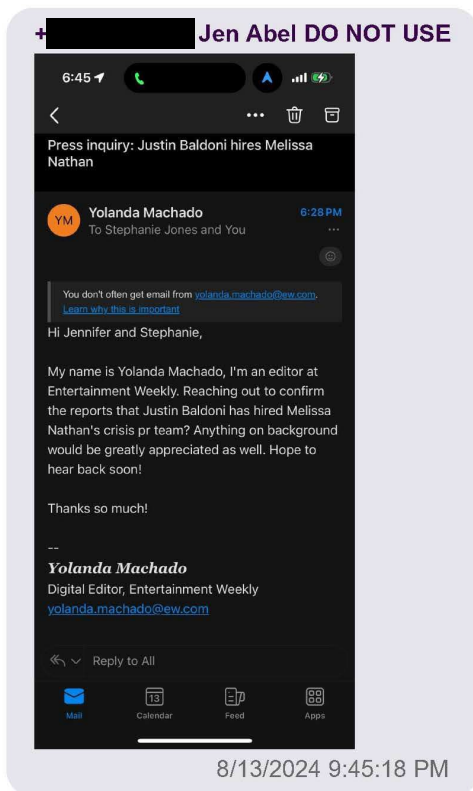


**Melissa Nathan (Owner)**

Stephanie

Are you aware there is a KILL STORY dropping this week on you and if you hadn't of blown us up we would not of been in such a bad place.

8/13/2024 9:23:15 PM



+ [REDACTED] Melissa Nathan (Owner)  
WHY IS THIS A BIG STORY  
8/13/2024 9:45:46 PM

+ [REDACTED] Jen Abel DO NOT USE  
This is wild  
8/13/2024 9:45:55 PM

+ [REDACTED] Melissa Nathan (Owner)  
This is the maddest account for so many reasons  
8/13/2024 9:45:56 PM

+ [REDACTED] Jen Abel DO NOT USE  
Should I call her?  
8/13/2024 9:46:07 PM

+ [REDACTED] Jen Abel DO NOT USE  
How is hiring a rep a story  
8/13/2024 9:46:17 PM

+ [REDACTED] Melissa Nathan (Owner)  
My lot can and say we are not giving comment if you prefer ?  
8/13/2024 9:46:26 PM

+ [REDACTED] Melissa Nathan (Owner)  
It's insane but trades I unfortunately understand but - ents no way  
8/13/2024 9:46:39 PM

+ [REDACTED] Melissa Nathan (Owner)

Normal people don't even know what a Pr is  
8/13/2024 9:46:48 PM

+ [REDACTED] Jen Abel DO NOT USE

I would try to guilt them and be like this isn't a story, etc.  
but defer to you.

8/13/2024 9:47:41 PM

+ [REDACTED] Melissa Nathan (Owner)

Exactly

8/13/2024 9:49:56 PM

+ [REDACTED] Jen Abel DO NOT USE

Ok I'll forward it

8/13/2024 9:52:01 PM

+ [REDACTED] Jen Abel DO NOT USE

I got another one

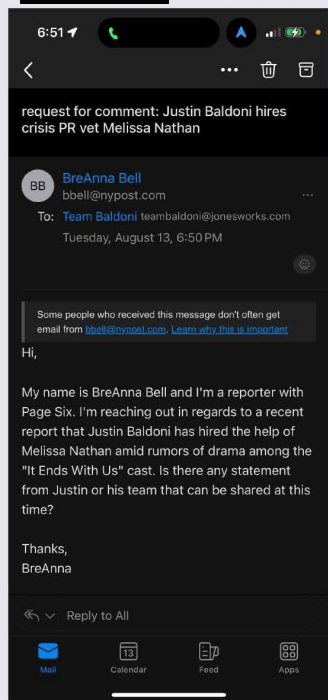
8/13/2024 9:52:06 PM

+ [REDACTED] Melissa Nathan (Owner)

Jen what the actual fuck

8/13/2024 9:52:15 PM

+ [REDACTED] Jen Abel DO NOT USE



8/13/2024 9:52:23 PM

+ [REDACTED] Jen Abel DO NOT USE

Forwarded both

8/13/2024 9:57:35 PM

+ [REDACTED] Melissa Nathan (Owner)

From my close reporter friend

Also for the high brow losers like people and variety - a way to cover it without quotes deranged people on social media or speculation

8/13/2024 10:00:55 PM

+ [REDACTED] Jen Abel DO NOT USE

Just have to tell you something and then I promise to leave you the fuck alone

8/13/2024 10:21:08 PM

+ [REDACTED] Melissa Nathan (Owner)

Never leave me alone

Just going to toilet 🚽

8/13/2024 10:21:45 PM

+ [REDACTED] Jen Abel DO NOT USE

Hahahaha how dare you not pick up

8/13/2024 10:22:01 PM

+ [REDACTED] Melissa Nathan (Owner)

On with Leslie

8/13/2024 10:55:54 PM

+ [REDACTED] Melissa Nathan (Owner)

[https://x.com/search?q=%22Blake%20Lively%22&src=trend\\_click&vertical=trends](https://x.com/search?q=%22Blake%20Lively%22&src=trend_click&vertical=trends)

8/13/2024 10:56:02 PM

+ [REDACTED] Melissa Nathan (Owner)

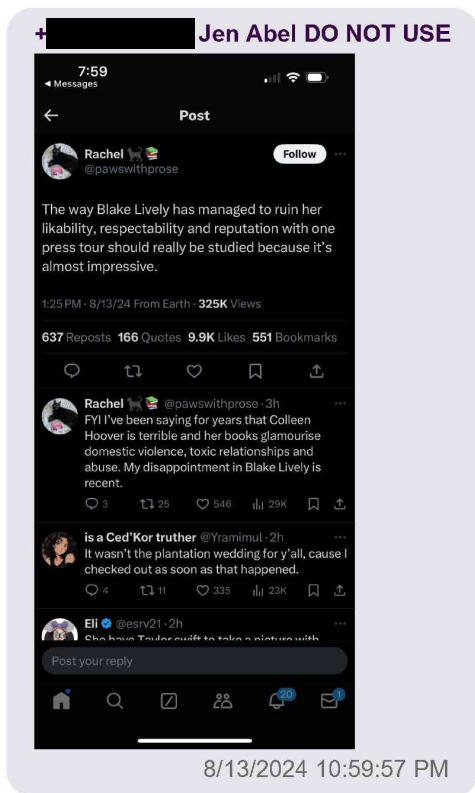
Couldn't not answer

8/13/2024 10:56:04 PM

+ [REDACTED] Jen Abel DO NOT USE

Omg what is she saying

8/13/2024 10:59:53 PM



+ [REDACTED] Melissa Nathan (Owner)  
Will call u after  
8/13/2024 11:00:03 PM

+ [REDACTED] Melissa Nathan (Owner)  
45 mins  
8/13/2024 11:32:11 PM

+ [REDACTED] Jen Abel DO NOT USE  
Wow  
8/13/2024 11:32:15 PM

+ [REDACTED] Melissa Nathan (Owner)  
Still on  
8/13/2024 11:32:21 PM

+ [REDACTED] Melissa Nathan (Owner)  
Jen.  
8/13/2024 11:59:44 PM

Contact

---

**Full Name:** Bryan Freedman

**Last Name:** Freedman

**First Name:** Bryan

**Mobile Phone:** + [REDACTED]

21:37

5G+

&lt; Inbox

What I'm Hearing: Jo...

Janey Heath, C.E.O. of Wayfarer Studios.

Heath told me today that despite the reports of fights during postproduction and dueling cuts of the movie, Baldoni didn't mean to suggest in his *Entertainment Tonight* interview that if Lively really wants control, she should just direct the damn sequel herself.

Okay, whatever. Everyone's been so consumed with this dumb feud that the outsize success of *It Ends With Us* almost feels like an afterthought. But a \$50 million opening for a \$25 million romance-drama with a domestic violence storyline begs the question: How did this happen?

**Scott Mendelson** gets into the marketing and release strategy below, but I was curious how Baldoni and his company, Wayfarer, ended up with the project in the first place. After all, this seems like a no-brainer for **Reese**

**Witherspoon's** Hello Sunshine or **Kerry**

**Washington's** company, or any number of the production outfits that now specialize in female-focused book adaptations.



21:37

5G+

&lt; Inbox

What I'm Hearing: Jo...



*Runner-up:* "I think **Blake Lively**'s ready to direct, that's what I think."

—**Justin Baldoni**, the *It Ends With Us* actor-director, suggesting at the premiere that his co-star should helm a follow-up, amid reports of a rift and dueling cuts of the film.

*A little more on this one...*

Baldoni didn't mean it like *that*, according to **Jamey Heath**, C.E.O. of Wayfarer Studios.

Heath told me today that despite the reports of fights during postproduction and dueling cuts of the movie, Baldoni didn't mean to suggest in his *Entertainment Tonight* interview that if Lively really wants control, she should just direct the damn sequel herself.

Okay, whatever. Everyone's been so consumed with this dumb feud that the outsize success of *It Ends With Us* almost feels like an afterthought. But a \$50 million opening for a \$25 million romance-drama with a domestic violence storyline begs the question: How did this happen?



17:57

LTE



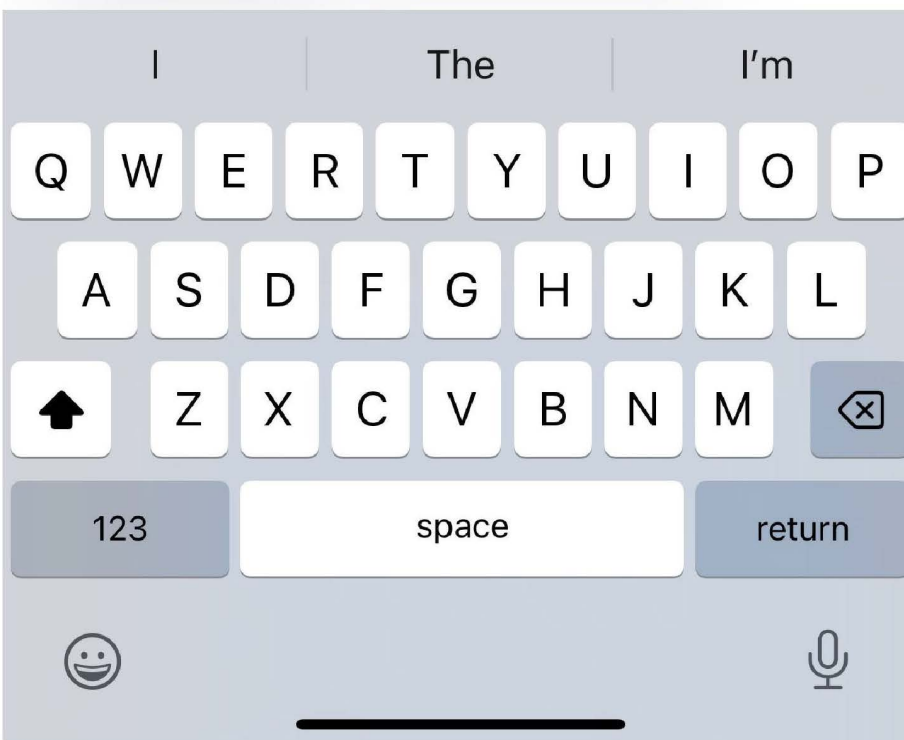
Pam &gt;

Sure. (I assume you know this is Pam McClintock from The Hollywood Reporter) We have a mutual friend .... Sarah Rothman. And I know we have spoken before (unless I am making that up. lol.)

I am reaching out because my colleague, Carly Thomas, has been covering the It End With Us behind-the-scenes drama and understands on good authority that Baldoni retained your services in recent weeks, or maybe a month or more. Would you be willing to talk to her or myself, even if on background only?

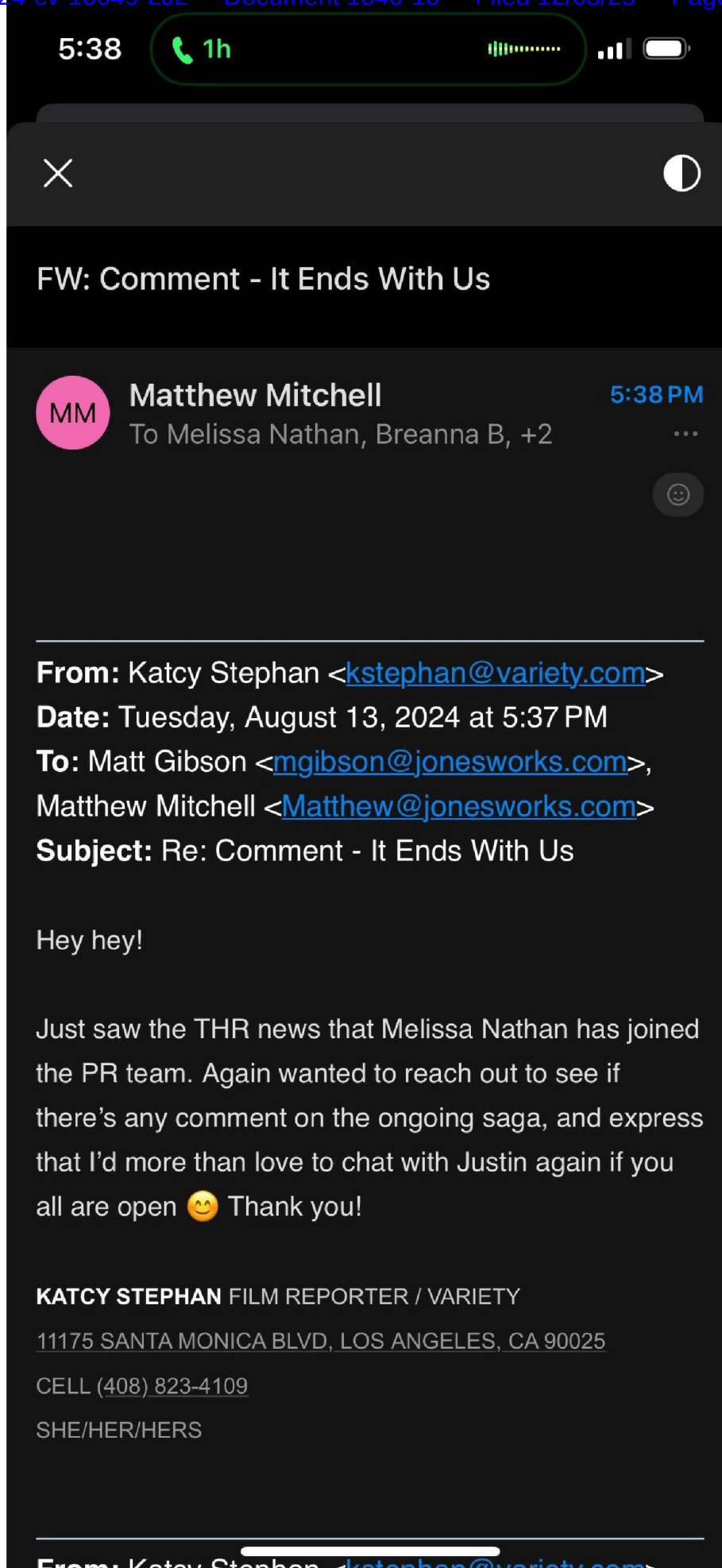


Reply



**DOCUMENT PRODUCED IN NATIVE FORMAT**

**DOCUMENT PRODUCED IN NATIVE FORMAT**



20:54

LTE



Google

Sign in



devoed definition

All

Images

Videos

Shopping

Web

News

devoed (comparative more devoed, superlative most devoed) (Northern England, slang) **Devastated**.

 [https://en.wiktionary.org/wiki](https://en.wiktionary.org/wiki/devoed)

[devoed](#) - Wiktionary, the free dictionary

 About featured snippets

 Feedback

## Devoed

Song by Feryquitous



### About

Released: 2015

Artist: [Feryquitous](#)

Album: [ZheleNaught](#)

### People also ask

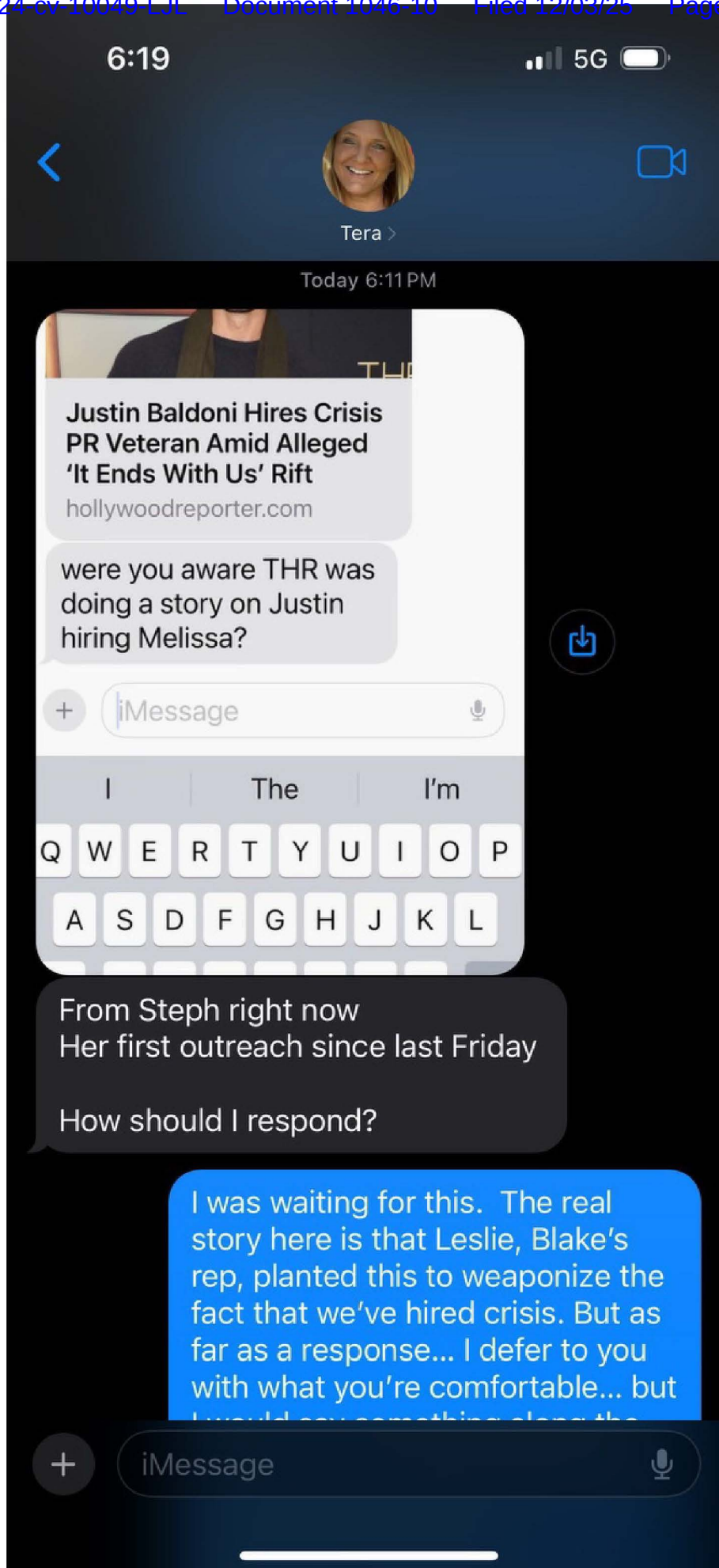


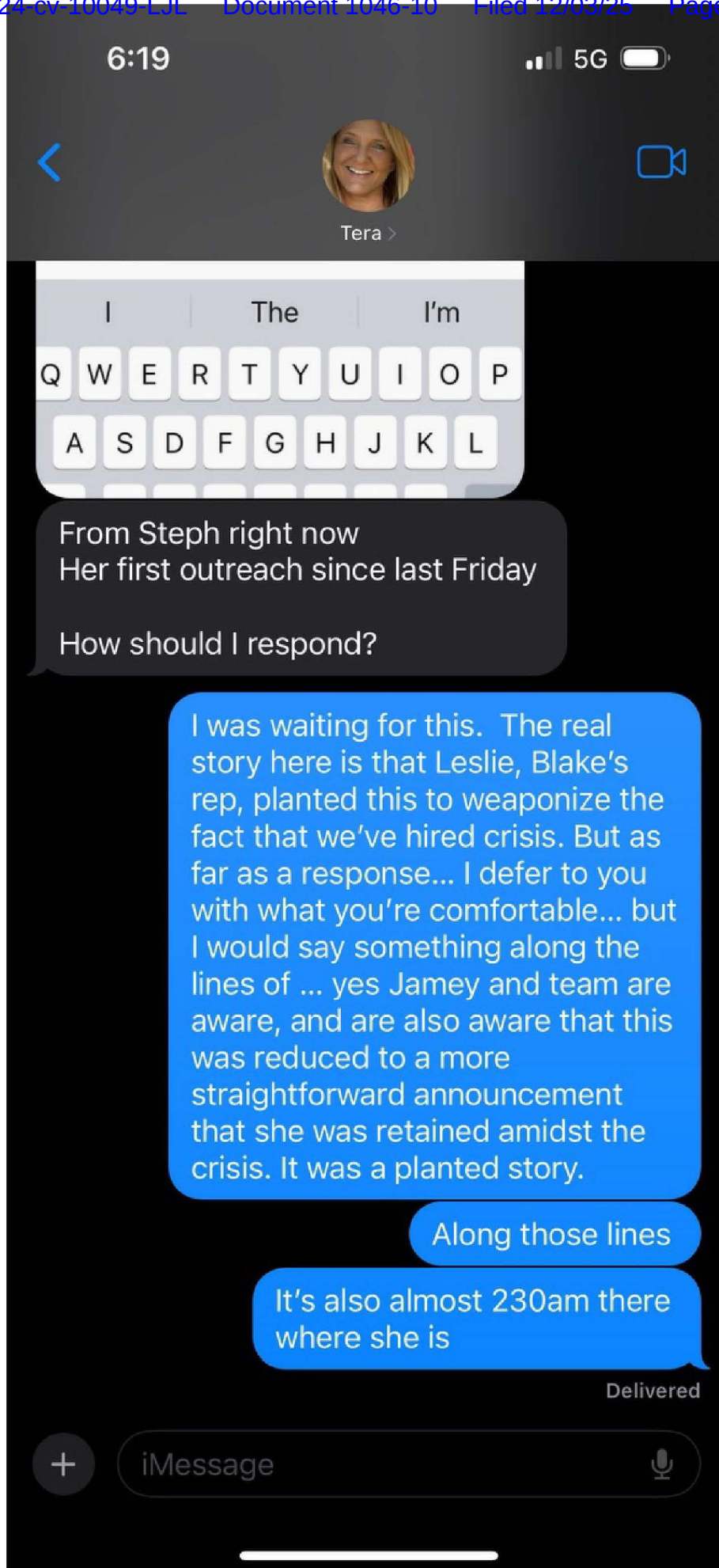
AA



Q devoed definition







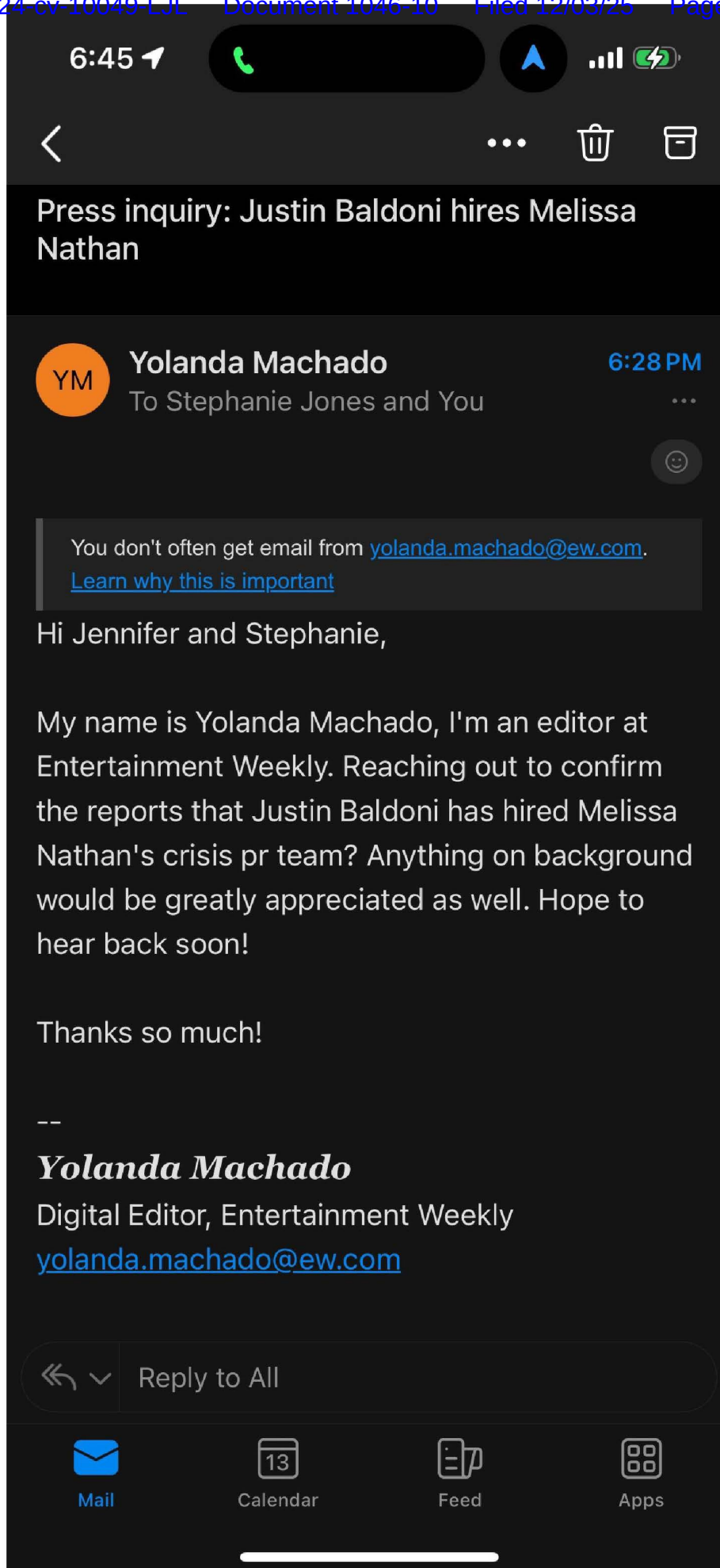
From Steph right now  
Her first outreach since last Friday  
  
How should I respond?

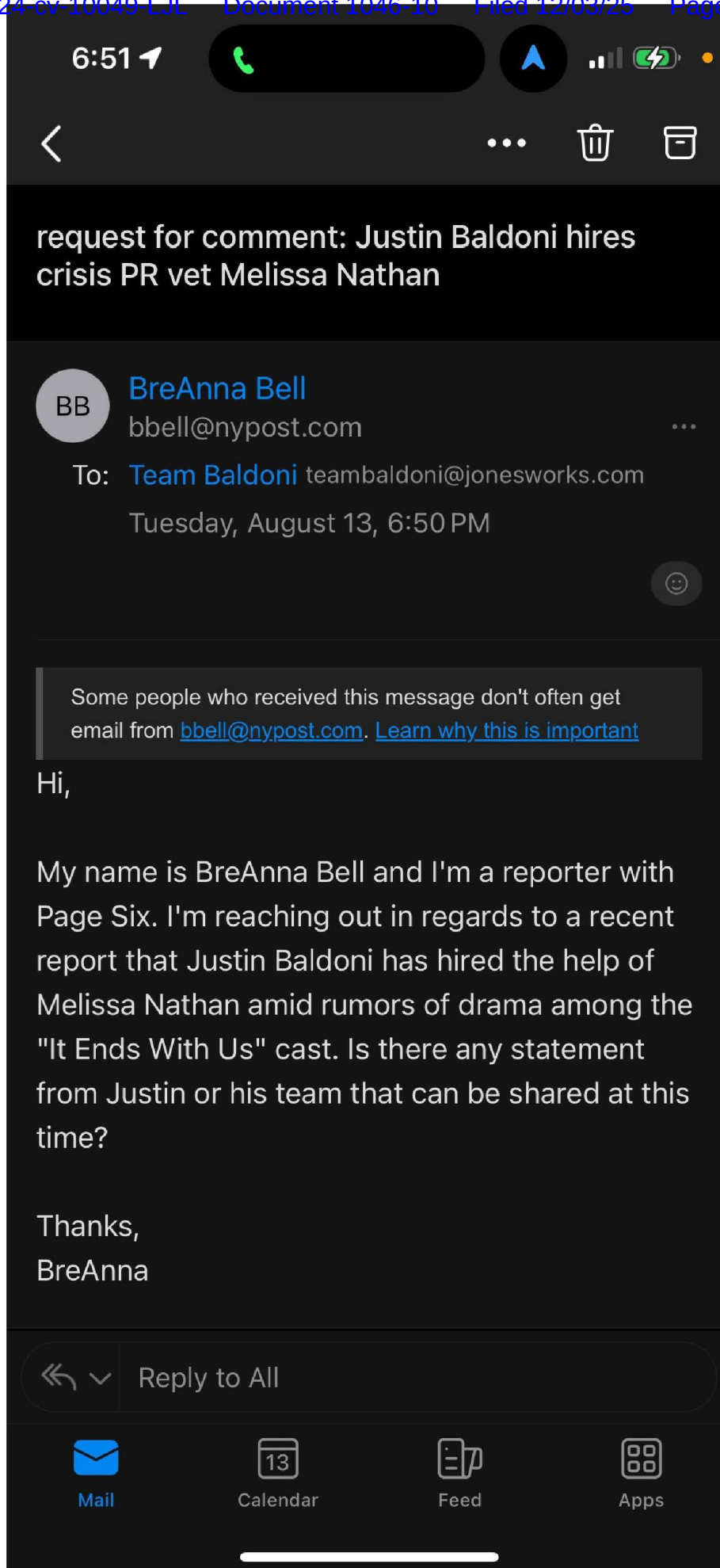
I was waiting for this. The real story here is that Leslie, Blake's rep, planted this to weaponize the fact that we've hired crisis. But as far as a response... I defer to you with what you're comfortable... but I would say something along the lines of ... yes Jamey and team are aware, and are also aware that this was reduced to a more straightforward announcement that she was retained amidst the crisis. It was a planted story.

Along those lines

It's also almost 230am there where she is

Delivered







# **EXHIBIT 38**

**From:** Katie Case <[REDACTED]>  
**Sent:** Wed, 7 Aug 2024 21:38:14 -0400 (EDT)  
**To:** Jennifer Abel <[REDACTED]>; Jed Wallace <[REDACTED]>  
**Cc:** Melissa Nathan <[REDACTED]>; [REDACTED]  
**Subject:** Re: Social / Digital — Wayfarer Studios

---

Certainly — Jed, we'll connect with you directly on this!

---

**From:** Jennifer Abel <[REDACTED]>  
**Sent:** Wednesday, August 7, 2024 9:20:44 PM  
**To:** Katie Case <[REDACTED]>; Jed Wallace <[REDACTED]>  
**Cc:** Melissa Nathan <[REDACTED]>; breanna@tagpr.com <[REDACTED]>  
**Subject:** Re: Social / Digital — Wayfarer Studios

I'm so sorry I'm in morning press from 630am on, and we head straight to Chicago. TAG team, is this something you can bring them up to speed on so they can hit the ground running? I'll have some freedom later in the afternoon to connect but don't want to hold this up.

---

**From:** Katie Case <[REDACTED]>  
**Sent:** Wednesday, August 7, 2024 9:18:37 PM  
**To:** Jed Wallace <[REDACTED]>; Jennifer Abel <[REDACTED]>  
**Cc:** Melissa Nathan <[REDACTED]>; [REDACTED]  
**Subject:** Social / Digital — Wayfarer Studios

Hi all,

Jen — Jed and his team are absolute magicians.

Jed — Wayfarer would like to move forward ASAP with social / digital mitigation and remediation.

Can we set a call for tomorrow morning to discuss? Let me know some times that work and we can send an invite.

Thank you,  
Katie

# **EXHIBIT 40**

**FILED UNDER  
SEAL**