

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

STEPHANIE JONES, JONESWORKS LLC,

Plaintiffs,

v.

JENNIFER ABEL, MELISSA NATHAN,  
JUSTIN BALDONI, WAYFARER STUDIOS  
LLC, and JOHN DOES 1-10,

Defendants.

Civ. Action No. 1:25-cv-00779-LJL  
rel. 1:24-cv-10049-LJL  
(Consolidated for pretrial purposes with  
1:25-cv-00449-LJL)

**JOINT STIPULATION AND PROPOSED SCHEDULING ORDER**

WHEREAS, on February 3, 2025, this Court entered a scheduling order (the “Jonesworks Scheduling Order”) in this matter (the “Jonesworks Action”) adopting in large part the Case Management Plan and Scheduling Order (“Lively Scheduling Order”) filed the same day in 24-cv-10049 (the “Lively Action”);

WHEREAS, the Jonesworks Scheduling Order did not adopt the Lively Scheduling Order’s dates for a proposed joint pretrial order and motions for summary judgment, ECF No. 21;

WHEREAS, on December 8, 2025, Jonesworks LLC and Stephanie Jones (the “Jones Parties”) moved for leave to amend their complaint, ECF No. 191;

WHEREAS, pursuant to the Jonesworks Scheduling Order, dates regarding the proposed joint pretrial order and motions for summary judgment would be determined at the post-discovery status conference set for December 9, 2025;

WHEREAS, during the conference on December 9, 2025, the parties agreed to confer regarding the briefing schedule for the motion for leave to amend and summary judgment;

WHEREAS, the Court has not set a trial date in the Jonesworks Action;

WHEREAS, following the December 9, 2025 conference, the parties met and conferred regarding the schedule and expert discovery in the Jonesworks Action;

WHEREAS, any extension to expert discovery deadlines in the Jonesworks Action will not affect a trial date as no trial date has been set;

WHEREAS, after conferring about the upcoming deadlines, the parties have agreed on the following schedule, and request a modification of the Jonesworks Scheduling Order to extend the expert discovery deadlines as follows:

- January 8, 2026: Deadline to oppose the Jones Parties’ motion for leave to amend;

- January 12, 2026: Deadline to exchange expert rebuttal reports
- January 22, 2026: Deadline to reply to the Jones Parties' motion for leave to amend;
- February 28, 2026: Deadline to complete depositions of experts.

The proposed extension will not affect any other existing dates or deadlines, including for trial, motions for summary judgment, or the filing of the joint pretrial order;

WHEREAS, the parties are continuing confer to about the schedule for summary judgment;

WHEREAS, in accordance with Section 1.D of Your Honor's Individual Practices in Civil Cases, the parties state the following:

- The expert discovery deadlines have previously been extended by 30 days, to November 15, 2025, ECF No. 750 [Lively Action];
- The parties have sought and received extensions of certain other fact discovery deadlines, ECF Nos. 93, 102, 124;
- The expert discovery deadlines were previously extended so that rebuttal reports were due December 22, 2025, and depositions were to be completed January 16, 2026, ECF Nos. 143, 152;
- All parties consent to the relief requested herein;
- The parties' next scheduled appearance before the Court is a hearing on the motion for summary judgment and spoliation motion filed by Blake Lively in the Lively Action on January 22, 2026.

WHEREAS, good cause exists to modify the existing Jonesworks Scheduling Order to extend the expert deadlines.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the parties through their undersigned counsel, that the motion for leave to amend will be briefed and the expert deadlines be extended as follows:

- January 8, 2026: Deadline to oppose the Jones Parties' motion for leave to amend;
- January 12, 2026: Deadline to exchange expert rebuttal reports;

- January 22, 2026: Deadline to reply to the Jones Parties' motion for leave to amend;
- February 28, 2026: Deadline to complete depositions of experts.

Dated: December 19, 2025

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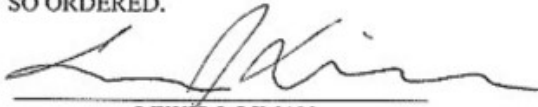
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\* e-signature affixed with consent pursuant to  
Section 8.5(b) of the SDNY Electronic Case  
Filing Rules & Instructions

*Attorneys for Defendants Wayfarer Studios  
LLC, Justin Baldoni, Melissa Nathan, and  
Jennifer Abel*

SO ORDERED.

A handwritten signature in black ink, appearing to read 'L. Liman', written over a horizontal line.

LEWIS J. LIMAN  
United States District Judge

December 19, 2025