

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

Index No. 162963/2025

WAYFARER STUDIOS LLC,

Defendant.

**NOTICE OF MOTION BY PLAINTIFF THE NEW YORK TIMES COMPANY  
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated January 14, 2026, in support of the Motion by Plaintiff The New York Times Company for Summary Judgment; the Affirmation of David McCraw, dated January 14, 2026, and exhibits attached thereto; and all prior papers submitted in this action, the undersigned counsel will move this Court in the Motion Submission Part, Room 130, at the Courthouse located at 60 Centre Street, New York, New York 10007, at 9:30 a.m. on March 19, 2026, or as soon thereafter as counsel may be heard, for an order pursuant to CPLR 3212 granting the Motion for Summary Judgment for Plaintiff The New York Times Company, awarding Plaintiff The New York Times Company its reasonable attorneys' fees in the amount of \$181,622.70, and providing such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, by agreement of the parties, Defendant's answering papers shall be served on or before February 27, 2026, and any reply papers shall be served on or before March 13, 2026.

Dated: New York, New York  
January 14, 2026

*David McCraw*

---

David McCraw  
Jackson Busch  
The New York Times Company  
Legal Department  
620 Eighth Avenue  
New York, NY 10018  
Phone: (212) 556-4031  
mccraw@nytimes.com

*Attorneys for The New York Times Company*

To: Fritz, Kevin A (via NYSCEF)  
Sunshine, Jason Hollander (via NYSCEF)

*Attorneys for Defendant*