EXHIBIT 11

Exhibit 16

JB PR (W/O JB)

Thread Participants: [redacted] Jamey Heath (Owner); [redacted] Jennifer Abel; [redacted] Katie Case; [redacted] Breanna B; [redacted] Melissa Nathan; [redacted] Matthew Mitchell; [redacted]; [redacted] Jamey Heath (Owner)

Active Participants: [redacted] Jamey Heath (Owner); [redacted] Katie Case; [redacted] Melissa Nathan; [redacted] Matthew Mitchell; [redacted]; System Message System Message

First Message: 8/10/2024 12:35:40 PM

Last Message: 8/10/2024 9:55:59 PM

[redacted] **Katie Case**
Hi team — so far, extremely limited pickup on Daily Mail or Page Six. We'll continue to keep an eye out and send pieces as needed, but so far it's been steady coverage on pure speculation. We've also started to see a shift on social, due largely to Jed and his team's efforts to shift the narrative towards shining a spotlight on Blake and Ryan. Again we'll continue to send links and screenshots but wanted to send an update in the meantime.
8/10/2024 12:35:40 PM

[redacted] **Matthew Mitchell**
Loved "Hi team — so far, extremely limited pickup on Dail..."
8/10/2024 12:37:02 PM

[redacted]
Thanks katie we are seeing the same thing.
8/10/2024 12:37:22 PM

[redacted] **Jamey Heath (Owner)**
Thanks Katie. I'd like to have a quick zoom today if we can all arrange without Justin. Is that possible for all?
8/10/2024 2:29:01 PM

[redacted]
I can join. Just running around so might not be on camera but just let me know when
8/10/2024 2:43:52 PM

[redacted] **Matthew Mitchell**
Happy to jump on too….likely off camera, no one needs to see this today. 😊
8/10/2024 3:01:26 PM

[redacted] **Katie Case**
Would a 6 PM ET call work? I could also circulate a dial in if that's easier for all vs a zoom.
8/10/2024 3:03:29 PM

[redacted]
Should be fine on my end
8/10/2024 3:05:55 PM

[redacted] **Matthew Mitchell**
Liked "Would a 6 PM ET call work? I could also circulate …"
8/10/2024 3:10:11 PM

[redacted] **Katie Case**
Checking if this works for Melissa and Breanna as well — I'll come back on this.
8/10/2024 3:20:05 PM

[redacted] **Jamey Heath (Owner)**
I'm available then thanks all
8/10/2024 3:20:57 PM

[redacted] **Melissa Nathan**
Sorry, I was in an appointment. 3pm PT is good!
8/10/2024 3:37:15 PM

[redacted] **Katie Case**
We'll circulate a zoom shortly
8/10/2024 3:44:11 PM

[redacted] **Jamey Heath (Owner)**
Thank you
8/10/2024 3:44:20 PM

[redacted]
Would be great for the digital team to boost this in any way possible…
8/10/2024 4:01:20 PM

[redacted]
https://www.tiktok.com/t/ZTNsQDYjj/
<__Library_SMS_Attach_1_6f_15_F95E3D_1_7C2221_1>
<__Library_SMS_Attach_1_85_05_48DD8D_1_DFEEC6_1>
8/10/2024 4:01:23 PM

[redacted] **Katie Case**
We'll flag to them!
8/10/2024 4:01:44 PM

[redacted]
And I like that this is now getting some viral attention 👀
8/10/2024 4:02:59 PM

[redacted]
https://www.tiktok.com/t/ZTNsQuMq8/
<__Library_SMS_Attach_1_97_07_DCA717_1_6973F2_1>
<__Library_SMS_Attach_1_10_00_DFB502_1_30EC72_1>
8/10/2024 4:03:01 PM

[redacted]
https://www.dailymail.co.uk/tvshowbiz/article-13731049/amp/Blake-Lively-producing-decision-begged-feud-Justin-Baldoni.html
<__Library_SMS_Attach_1_86_06_DD2DB9_1_1B2910_1>
<__Library_SMS_Attach_1_86_06_5374D2_1_9F0134_1>
8/10/2024 4:26:05 PM

[redacted]
The headline is clixkbate but it just recirculates their previous article
8/10/2024 4:26:19 PM

[redacted]
Sharing this here too in case digital has an idea of how to amplify:
8/10/2024 4:36:40 PM

[redacted]
https://www.hollywoodreporter.com/movies/movie-features/justin-baldoni-it-ends-with-us-interview-ryle-pressure-1235970799/amp/
<__Library_SMS_Attach_1_34_04_2049E9_1_D18563_1>
<__Library_SMS_Attach_1_ef_15_CC0D01_1_87409A_1>
8/10/2024 4:36:42 PM

[redacted] **Katie Case**
Thank you! We'll share this as well — at the very least ask for engagement in the comments
8/10/2024 4:37:14 PM

[redacted] **Katie Case**
Emphasized "The headline is clixkbate but it just recirculates…"
8/10/2024 4:37:19 PM

[redacted]
Loved “Thank you! We’ll share this as well — at the very …”
8/10/2024 4:37:24 PM

System Message System Message
System
You named the conversation "JB PR (W/O JB)".
8/10/2024 5:09:03 PM

System Message System Message
System
You named the conversation "JB PR (W/O JB)".
8/10/2024 5:09:37 PM

System Message System Message
System
You named the conversation "JB PR (W/O JB)".
8/10/2024 5:09:38 PM

System Message System Message
System
You named the conversation "JB PR (W/O JB)".
8/10/2024 5:09:38 PM

System Message System Message
System
You named the conversation "JB PR (W/O JB)".
8/10/2024 5:09:38 PM

[redacted] **Matthew Mitchell**
https://www.instagram.com/reel/C-gEF6qSpm0/?igsh=MzRlODBiNWFlZA==
<__Library_SMS_Attach_1_2f_15_5D2874_1_72D978_1>
<__Library_SMS_Attach_1_0f_15_166D99_1_90AE0C_1>
<__Library_SMS_Attach_1_ba_10_8F1B17_1_143185_1>
8/10/2024 5:17:27 PM

[redacted] **Matthew Mitchell**
We love a nice shady moment!
8/10/2024 5:17:32 PM

[redacted] **Melissa Nathan**
You had my attention straight away when I saw the word shady
8/10/2024 5:18:38 PM

[redacted] **Matthew Mitchell**
No comments allowed.

"updated version…I like it way better"

Honestly it's gold.
8/10/2024 5:19:50 PM

[redacted] **Katie Case**
Laughed at "We love a nice shady moment! "
8/10/2024 5:25:34 PM

[redacted] **Katie Case**
Emphasized "You had my attention straight away when I saw the …"
8/10/2024 5:25:38 PM

[redacted] **Katie Case**
Loved "No comments allowed.

"updated version…I like it …"
8/10/2024 5:25:41 PM

[redacted] **Katie Case**
Zoom for our use here:
8/10/2024 5:52:12 PM

[redacted] **Katie Case**
https://us06web.zoom.us/j/81637481985
<__Library_SMS_Attach_1_32_02_D1BE3B_1_0D9C7A_1>
8/10/2024 5:52:16 PM

[redacted] **Jamey Heath (Owner)**
See you shortly
8/10/2024 5:57:25 PM

[redacted] **Katie Case**
https://nypost.com/2024/08/10/entertainment/it-ends-with-us-blooms-in-no-1-box-office-spot/?utm_campaign=iphone_nyp&utm_source=pasteboard_app
<__Library_SMS_Attach_1_bb_11_66DCA1_1_8A6FBC_1>
8/10/2024 6:55:28 PM

[redacted] **Melissa Nathan**
https://www.google.com/search?q=jailbirds+netflix&ie=UTF-8&oe=UTF-8&hl=en-gb&client=safari&ebo=0#fpstate=vclbx
<__Library_SMS_Attach_1_ac_12_5CB889_1_F18DB6_1>
<__Library_SMS_Attach_1_33_03_BACCFF_1_36CC18_1>
8/10/2024 7:04:20 PM

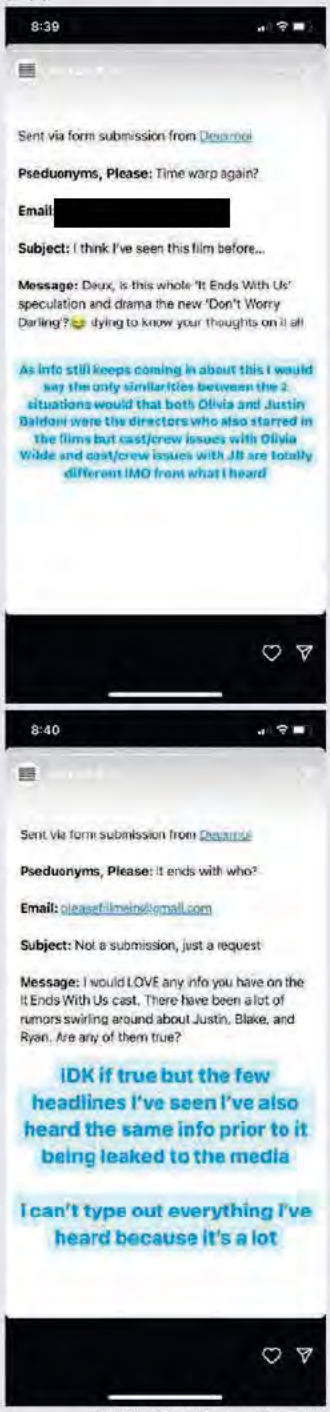
[redacted] **Melissa Nathan**
Ok leaving it here thanks
8/10/2024 7:04:20 PM

[redacted] **Katie Case**
Emphasized "https://www.google.com/search?q=jailbirds+netflix&…"
8/10/2024 7:04:37 PM

[redacted] **Katie Case**
It's spectacular
8/10/2024 7:04:44 PM

[redacted] Katie Case

FYI



8/10/2024 8:41:23 PM

[redacted]

Thanks katie. I forwarded two requests for comment regarding the NYP and DM articles. Just fyi

8/10/2024 9:55:59 PM

Exhibit 17

Short Message Report

Conversations: 1	Participants: 4
Total Messages: 5	Date Range: 8/11/2024

Outline of Conversations

iMessage Chat: cha[redacted] • 5 messages on 8/11/2024 • Custodian: Abel, Jennifer [redacted] • Custodian: Abel, Jennifer [redacted] • Jamey Heath [redacted] • Mitz

Messages in chronological order (times are shown in GMT -04:00)

iMessage Chat: chat550206532377749875

M **Mitz** [redacted] ► 8/11/2024, 6:45 PM

A thought.....

Do we consider holding off on any posts directly from Justin. He is the only one from the cast posting anything at the moment and fans are going ham on Blake Jenny and Colleen's comments section, Colleen went private from all the hate,

I worry another post from Justin about DV and thanking "women everywhere" might further fuel the fire.
Maybe we just post fan reactions for a minute

Receipts • Custodian: Abel, Jennifer [redacted] [R:8/11/2024, 6:48 PM]

JA **Custodian: Abel, Jennifer** [redacted] ◄ 8/11/2024, 6:52 PM

A valid thought. But I'm also thinking of the next wave of press for Monday am news cycle and if there's anymore pickup of those articles then a post like this would further combat the negative. Plus since they are releasing the podcast tomorrow, it further instates that he's in Sweden (even though it says that in the episode but people are dumb)

M **Mitz** [redacted] ► 8/11/2024, 6:53 PM

Loved "A valid thought. But I'm also thinking of the next..."

Receipts • Custodian: Abel, Jennifer [redacted] [R:8/11/2024, 6:53 PM]

JH **Jamey Heath** [redacted] ► 8/11/2024, 6:56 PM

Appreciate you thinking about this. And yet... I think we stay the course. Him doing exactly what he does is in great part what has combated the noise against him. His efforts should not be thwarted. I do see what you mean, however the awareness to stay on point is more beneficial than the potential negative. If he is ridiculed by anyone for continuing to speak about the real issue, then so be it. I can live with that n

Receipts • Custodian: Abel, Jennifer [redacted] [R:8/11/2024, 6:56 PM]

M **Mitz** [redacted] ► 8/11/2024, 7:01 PM

Copy thank you both!
For clarity I don't worry about Justin being ridiculed I worry that ch and BL will continue to be ridiculed for not doing the same. Stoking the fire
Great for Justin, but more hate for others might trigger the need to defend one's self.

But I hear the point and I'm good, just wanted to say it out loud, I've been seeing teamJustin pop up on so many gossip podcasts on social and he's definitely getting lots of support. Which is great. And also a bit scary given blake has gone dark on socials

Receipts • Custodian: Abel, Jennifer [redacted] [R:8/11/2024, 7:01 PM]

Exhibit 18

PR Thread w/TAG

Thread Participants: [redacted] Jamey Heath; [redacted] Jen Able; [redacted] Henny Grace (Owner); [redacted] Katie TAG; [redacted] Brianna TAG; [redacted] Melissa TAG; [redacted] Matthew Mitchell; [redacted] Jennifer Able; [redacted] J B (Owner)

Active Participants: [redacted] Henny Grace (Owner); [redacted] Katie TAG; [redacted] Brianna TAG; [redacted] Jennifer Able; System Message System Message

First Message: 8/13/2024 5:40:41 AM

Last Message: 8/13/2024 7:21:03 PM

[redacted] **Henny Grace (Owner)**
https://www.tiktok.com/t/ZP81FY9v7/
<__Library_SMS_Attach_1_a4_04_at_0_8_1_FA3C9E_1>
<__Library_SMS_Attach_1_a6_06_at_2_8_1_7D74AA_1>
<__Library_SMS_Attach_1_a5_05_at_1_8_1_71B04E_1>
8/13/2024 5:40:41 AM

[redacted] **Henny Grace (Owner)**
Please watch this entire video.
8/13/2024 5:40:41 AM

[redacted] **Brianna TAG**
Yes, a lot of this sentiment has been shared and expressed across social media. People are reading through her self-centered promo
8/13/2024 10:23:45 AM

[redacted] **Katie TAG**
Emphasized “Yes, a lot of this sentiment has been shared and e…”
8/13/2024 10:24:23 AM

[redacted] **Henny Grace (Owner)**
https://www.tiktok.com/t/ZP81Fc7Sp/
<__Library_SMS_Attach_1_e9_09_14DCC2_1_A88D26_1>
<__Library_SMS_Attach_1_64_04_D2C008_1_FD1A69_1>
8/13/2024 2:21:00 PM

[redacted] **Jennifer Able**
Yes we have this and this is what the digital team is amplifying
8/13/2024 2:23:14 PM

[redacted] Jennifer Able
There is also an entire Reddit thread dedicated to this video
8/13/2024 2:23:25 PM

[redacted] Henny Grace (Owner)
Oh wow- it's hit Reddit ?
8/13/2024 2:26:42 PM

[redacted] Henny Grace (Owner)
This is the celebrity kind interview I did - I think me saying I wanted a trigger warning is a good thing -
<__Library_SMS_Attach_1_43_03_4E0C9A_1_Justin_1.heic>
8/13/2024 4:18:09 PM

[redacted] Jennifer Able
Yes that's what we are pushing out
8/13/2024 4:18:28 PM

[redacted] Henny Grace (Owner)
And that in my cut there was a big call to action BEFORE my name -
8/13/2024 4:18:49 PM

[redacted] Henny Grace (Owner)
But no one can know that
8/13/2024 4:18:53 PM

[redacted] Henny Grace (Owner)
Hey guys, just a heads up. I'm getting friends reaching out, saying they're having a lot of PR articles slandering me coming up on their feed. So obviously they are pushing these things out...
8/13/2024 4:45:49 PM

System Message System Message
System
You named the conversation "TAG".
8/13/2024 6:38:54 PM

System Message System Message
System
You named the conversation "TAG".
8/13/2024 6:38:54 PM

[redacted] Jennifer Able
Just sharing this because it's getting a ton of pickup. In a good way. Proud to work with you JB!
8/13/2024 7:21:01 PM

[redacted]Jennifer Able
https://www.tiktok.com/t/ZTNtUt8Lb/
<__Library_SMS_Attach_1_75_05_5C5BC8_1_90B81C_1>
<__Library_SMS_Attach_1_0d_13_744D6D_1_514744_1>
8/13/2024 7:21:03 PM

Exhibit 19

Short Message Report

Conversations: 1	Participants: 9
Total Messages: 135	Date Range: 8/14/2024 - 8/15/2024

Outline of Conversations

[redacted]/System Message chatroom • 135 messages between 8/14/2024 - 8/15/2024 • [redacted] • [redacted] • [redacted] • Jen Abel [redacted]) • Jen Abel New Number [redacted] • Katie Case [redacted] • Matthew Mitchell [redacted] • Nathan Melissa [redacted] • System Message (System Message)

Messages in chronological order (times are shown in GMT -04:00)

[redacted]/System Message chatroom

JA **Jen Abel** [redacted] 8/14/2024, 10:00 PM
https://www.instagram.com/reel/C-n_syASW4b/?igsh=MzRIODBiNWFIZA==

Attachment: __Libr_1(19) (54 KB)

Attachment: __Libr_1(20) (31 KB)

Attachment: __Libr_1(21) (30 KB)

JA **Jen Abel** [redacted] 8/14/2024, 10:00 PM
Just fyi— dropping tomorrow. Here's one of the teases. We all listened to the rough cut as you know and it's a great interview showcasing your character

[redacted] 8/14/2024, 10:27 PM
https://www.tiktok.com/t/ZP81MUVh5/

Attachment: __Libr_1(22) (71 KB)

Attachment: __Libr_1(23) (19 KB)

[redacted] 8/15/2024, 12:48 AM
What the hell is this? Really? Sony?

[redacted] 8/15/2024, 12:48 AM
https://www.hollywoodreporter.com/movies/movie-news/it-ends-with-us-sony-blake-lively-1235974889/

Attachment: __Libr_1(24) (2 KB)

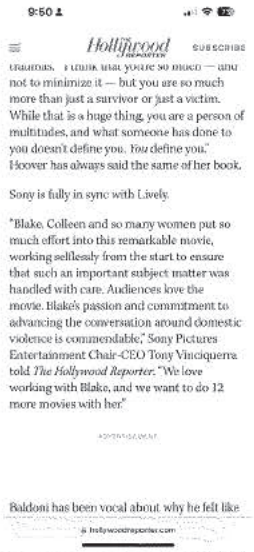
Attachment: __Libr_1(25) (230 KB)

[redacted] 8/15/2024, 12:49 AM
This is all wrong.
And they didn't buy the rights to produce the film-

[redacted] 8/15/2024, 12:50 AM
They didn't produce the film

This is a blatant lie- about her advancing domestic violence convos!?

[redacted] 8/15/2024, 12:50 AM
[url:'https://p49-content.icloud.com/M41FCB2D0C7B8332D65EDAFA3353C3FFAD4E74D191608FAC6B85F232143BE3E9C.C01USN00']


9:50

Hollywood Reporter SUBSCRIBE

traumas. I think that you're so much — and not to minimize it — but you are so much more than just a survivor or just a victim. While that is a huge thing, you are a person of multitudes, and what someone has done to you doesn't define you. *You* define you." Hoover has always said the same of her book.

Sony is fully in sync with Lively.

"Blake, Colleen and so many women put so much effort into this remarkable movie, working selflessly from the start to ensure that such an important subject matter was handled with care. Audiences love the movie. Blake's passion and commitment to advancing the conversation around domestic violence is commendable," Sony Pictures Entertainment Chair-CEO Tony Vinciquerra told *The Hollywood Reporter*. "We love working with Blake, and we want to do 12 more movies with her."

ADVERTISEMENT

Baldoni has been vocal about why he felt like

hollywoodreporter.com

Image: __Library_SMS_Attachments_31_01_0822798D-6A82-4CF6-ADE9-17829FF2B5E5_IMG_4784.PNG (338 KB)

JA **Jen Abel** [redacted] 8/15/2024, 12:55 AM

It's complete BS. We were alerted by thr approx 5 min before going live. There are many things here that need adjusting. But taking a Step back, the fan uprising against this piece is starting to swell. This will backfire.

JA **Jen Abel** [redacted] 8/15/2024, 12:55 AM

https://x.com/thr/status/1823903545105768759?s=46&t=ICall20h75OB3Ad6Pnd3Sw

Attachment: __Libr_1(26) (8 KB)

[redacted] 8/15/2024, 12:55 AM

Hi I'm Sony and I'm going to cozy up to ryan and erase justin

[redacted] 8/15/2024, 1:04 AM

Let the fans handle I guess- it's just crazy
Sony has no spine. And yet as jamey says they are doing their job.

JA **Jen Abel** [redacted] 8/15/2024, 1:06 AM

I think we should collectively discuss our options here. Let's chat tomorrow— personally I have a late breakfast meeting at 10, and then a call at 1130 that I can't move but we should block out a time we can connect and regroup about this and everything now that you're back

[redacted] 8/15/2024, 1:07 AM

Morning is good before that -

[redacted] 8/15/2024, 1:07 AM

I have nothing - just kids here
I'm sure II be up early with jet lag

JA **Jen Abel** [redacted] 8/15/2024, 1:07 AM

While this caught everyone off guard, and feels horrible to have them take such a stance like this, I do feel this will backfire and not change the position we are in at all. If anything, it has turned the internet even more against Blake and Ryan because they have seen the press first hand.

[redacted] 8/15/2024, 1:07 AM

I'd like to have a team call anyways

JA **Jen Abel** [redacted] 8/15/2024, 1:08 AM

Ok yes we can chat in the am and can regroup later in afternoon as well. Let's touch base early am and set a call since

some are on et.

[redacted] 8/15/2024, 1:08 AM



[redacted] 8/15/2024, 1:08 AM

Thanks and night all - appreciate you

JA **Jen Abel** [redacted] 8/15/2024, 1:08 AM

Loved “Thanks and night all - appreciate you ”

[redacted] 8/15/2024, 1:14 AM

I spoke with justin.
Here’s my honest thoughts.
No it’s not perfect. There is some misinformation here for sure. And yet… I see this as a win. Let her be praised by Sony. Who cares. It’s not a bullet at us. Finally, there is an article that is not directed at Justin.
And who knows maybe Blake and Ryan forced Sony to put something out on their behalf. Even if they did it on their own volition, who cares, the industry knows the truth we know the truth. Whether or not 12 or 100 fans read that and believe it, it does not matter. As I’ve said many times, Sony’s job is to promote the movie and to make as much money as they can. That’s the only reason why we partnered with them. And they are doing just that. I don’t expect them to be any different than who they have always been and who they are. And the fact they are cozying up to Blake, also makes sense. if they are even doing that. They are a business that is protecting their own bottom line. What Wayfarer stands for is what Wayfarer stands for and I don’t expect anyone else to. If we can get some things corrected great, if not, who cares. And honestly, I don’t care who Sony nestles up to. As long as they can put out a movie of ours and make money so that we can be Wayfarer and do what we do then I am good. Let’s not lose sight of the big picture. Right now that’s keeping bullets away from you Justin away from me and away from Wayfarer. And if that comes at the expense of her being praised, then so be it. And that is the win.

And yet I get it’s frustrating.

JA **Jen Abel** [redacted] 8/15/2024, 1:16 AM

Loved “I spoke with justin.
Here’s my honest thoughts.
…”

JA **Jen Abel** [redacted] 8/15/2024, 1:16 AM

Well said

[redacted] 8/15/2024, 1:17 AM

https://www.tiktok.com/t/ZP81r87kx/

Attachment: __Libr_1(27) (87 KB)

Attachment: __Libr_1(28) (19 KB)

[redacted] 8/15/2024, 1:17 AM

Are we doing anything to influence this stuff? Or is this real people helping and coming to my defense …

JA **Jen Abel** [redacted] 8/15/2024, 1:19 AM

No no no. No bots, no fake accounts, none of that.

JA **Jen Abel** [redacted] 8/15/2024, 1:19 AM

Real people coming to your defense. Trust, it’s astounding to see the enormous outpouring of support but it’s 💯 real

[redacted] 8/15/2024, 1:20 AM

People are thinking it’s us and -
Watch that video

[redacted] 8/15/2024, 1:21 AM

Just want to be mindful of a swell turning - but you guys know this game I've never been in evolved in anything before

JA **Jen Abel** [redacted] 8/15/2024, 1:21 AM
Yeah we saw and flagged that earlier. And of course there are people who speculate and discuss and poke holes, that's how they make a living on the internet. The minority may feel loud as we have discussed, but it's still the minority.

[redacted] 8/15/2024, 1:26 AM
Yes we are keeping eyes on it all. And yet… let's not be dissuaded by the 10 percent. We know there will be people who fan the fire from the east, but if the majority are speaking from the west, then damnit let's live in the west and simply keep an eye on the east. Yes I'm now a poet.
Also… it's late on the east coast and we are probably keeping people up. Let's go dark.

[redacted] 8/15/2024, 1:26 AM
❤️🙏

[redacted] 8/15/2024, 2:59 AM
https://www.tiktok.com/t/ZTNnrUUQs/

Attachment: __Libr_1(29) (89 KB)

Attachment: __Libr_1(30) (19 KB)

SM **System Message (System Message)** 8/15/2024, 10:16 AM
[redacted] added [redacted] to the conversation

JA **Jen Abel** [redacted] 8/15/2024, 10:17 AM
Morning team— sorry for the early text for the west coast folks. Adding Matthew here as well as he has also been integral to monitoring everything.

JA **Jen Abel** [redacted] 8/15/2024, 10:18 AM
Just touching base about getting on a quick zoom this morning to realign on everything and discuss next steps— would 830am PT work for everyone?

NM **Nathan Melissa** [redacted] 8/15/2024, 10:19 AM
It doesn't work for me I'm afraid because I'm already on site for this project I'm doing
But please go ahead without me and when I'm finished probably around 2 pm my time I will chat but I'm on text !

https://www.cosmopolitan.com/entertainment/celebs/a61885812/ryan-reynolds-justin-baldoni-it-ends-with-us-drama/

These stories are making her look even more unhinged

NM **Nathan Melissa** [redacted] 8/15/2024, 10:20 AM
Have you received any overnight request for comments?

JA **Jen Abel** [redacted] 8/15/2024, 10:20 AM
None

JA **Jen Abel** [redacted] 8/15/2024, 10:20 AM
You?

NM **Nathan Melissa** [redacted] 8/15/2024, 10:20 AM
None

[redacted] 8/15/2024, 10:24 AM
I'm a little more concerned about these TikTok's claiming they know information and there are some dark disturbing stories about me that are going to break as they're getting DM's. And the only way that would be happening if there are lies.

[redacted] 8/15/2024, 10:27 AM
What time works -

[redacted] 8/15/2024, 10:28 AM
I'd like us all on if possible

[redacted] 8/15/2024, 10:28 AM
We haven't had a regroup

NM **Nathan Melissa** [redacted] 8/15/2024, 10:29 AM
I personally am not concerned about this.

Because we all know there are no dark and disturbing stories .

It's just socials acting exactly how they always act in any situation

They want more clicks they want more views and let the end of the day they will all be regurgitating complete rubbish.

And referencing the Australian podcast you saw - that's complete garbage. I can tell you hand on my heart there was four human women working on that trial and I was one of them. Not one Russian bot in site- it's actually very similar to what you're having right now the outpouring of love and support being weaponised against you by her side because "it can't be true"

[redacted] 8/15/2024, 10:33 AM
Loved "I personally am not concerned about this.

Becaus..."

[redacted] 8/15/2024, 10:33 AM
I appreciate you walking me through this and holding my questions - it's all a first for me

NM **Nathan Melissa** [redacted] 8/15/2024, 10:36 AM
Which is even more reason we are on your side because you have have never had one issue before.

JA **Jen Abel** [redacted] 8/15/2024, 10:37 AM
Loved "Which is even more reason we are on your side beca..."

JA **Jen Abel** [redacted] 8/15/2024, 10:37 AM
And why the internet is too. It's not bots. If I see that narrative one more time I'm unleashing the Harvey article

KC **Katie Case** [redacted] 8/15/2024, 10:37 AM
Laughed at "And why the internet is too. It's not bots. If I ..."

[redacted] 8/15/2024, 10:38 AM
Is there anyway that we could do earlier Jen? We are all up here with jet lag and Emily wanted to go have a tea and a croissant at The Dutchess at around 8:30.

JA **Jen Abel** [redacted] 8/15/2024, 10:40 AM
Aw love that. I can do 8am but I know the whole tag team isn't avail so we can do us and katie and bre and then reconnect later in the afternoon when Melissa is available does that work?

JA **Jen Abel** [redacted] 8/15/2024, 10:40 AM
Jamey does that work?

[redacted] 8/15/2024, 10:41 AM
Sure

[redacted] 8/15/2024, 10:41 AM
Good

JA **Jen Abel** [redacted] 8/15/2024, 10:42 AM
Katie are you able to send a zoom? Sorry I'm picking on you bc you're et

KC **Katie Case** [redacted] 8/15/2024, 10:43 AM
Of course! And no problem 🙂 sending an invite and zoom now for 8 AM PT / 11 AM ET

JA **Jen Abel** [redacted] 8/15/2024, 10:44 AM
Loved "Of course! And no problem 🙂 sending an invite and…"

KC **Katie Case** [redacted] 8/15/2024, 10:45 AM
Including the zoom here as well for quick access:
https://us06web.zoom.us/j/82403495011?pwd=AboGEKJYFNmMFMTGI3fCqHxLPgFoNQ.1
(https://us06web.zoom.us/j/82403495011?pwd=AboGEKJYFNmMFMTGI3fCqHxLPgFoNQ.1)

JA **Jen Abel** [redacted] 8/15/2024, 10:56 AM
A peace offering from people magazine 🙂

JA **Jen Abel** [redacted] 8/15/2024, 10:56 AM
https://www.instagram.com/reel/C-sZGONumYD/?igsh=MzRIODBiNWFIZA==

Attachment: __Libr_1(31) (44 KB)

Attachment: __Libr_1(32) (31 KB)

Attachment: __Libr_1(33) (30 KB)

KC **Katie Case** [redacted] 8/15/2024, 10:58 AM
Loved "https://www.instagram.com/reel/C-sZGONumYD/?igsh=M…"

KC **Katie Case** [redacted] 8/15/2024, 10:58 AM
This is huge!!

[redacted] 8/15/2024, 10:59 AM
People has been pretty terrible - nice to see them post it
My dad posted it a few days ago -
But of course it was much more about Blake -

[redacted] 8/15/2024, 11:00 AM
Yes for sure!

[redacted] 8/15/2024, 11:00 AM
I flagged this to Elizabeth yesterday

JA **Jen Abel** [redacted] 8/15/2024, 11:01 AM
HA yeah I think she felt the pressure after our call last night 😅

JA **Jen Abel** [redacted] 8/15/2024, 11:01 AM
Can we have digital team boost this interview

[redacted] 8/15/2024, 11:01 AM
Yes for sure

NM **Nathan Melissa** [redacted] 8/15/2024, 11:05 AM
It was a very strong teamwork call at 11pm.

JA **Jen Abel** [redacted] 8/15/2024, 11:06 AM
Laughed at "It was a very strong teamwork call at 11pm."

[redacted] 8/15/2024, 12:52 PM
From Claire Wineland mom. "Hi there…is there anything we can do at Claire's Place to help? "

[redacted] 8/15/2024, 1:38 PM
From a friend / my trainer - [url:'https://p48-content.icloud.com/M41FCB2D0C7B8332D65EDAFA3353C3FFAD4E74D191608FAC6B85F232143BE3E9C.C01USN00']

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[redacted] 8/15/2024, 2:18 PM
This to me feels like a post or something to amplify

[redacted] 8/15/2024, 2:18 PM
https://www.instagram.com/reel/C-qTAgcK3MV/?igsh=ODAwMXBwbXZpOTg=

Attachment: __Libr_1(34) (53 KB)

Attachment: __Libr_1(35) (31 KB)

Attachment: __Libr_1(36) (30 KB)

[redacted] 8/15/2024, 2:18 PM
I even talk about the new cycle and click bait

JA **Jen Abel** [redacted] 8/15/2024, 2:33 PM
Definitely let's boost this AP piece

[redacted] 8/15/2024, 2:33 PM
Should I reshare on my stories ?

[redacted] 8/15/2024, 2:33 PM
And TikTok as a feed post

[redacted] 8/15/2024, 2:46 PM
This video is great and we have pushed it out digitally. In terms of you posting it yourself, I would avoid re-sharing anything that's essentially a response to negative feedback - as caption here is "…responds to critics who say film glorifies DV.." I think these next few days, regarding what you post on your personal channels, we should focus more on the positive feedback, responses, continuing to highlight the themes of the film, etc.

[redacted] 8/15/2024, 2:47 PM
Also, the Brandon / People piece is blowing up online. Getting great traction and reception!

[redacted] 8/15/2024, 2:47 PM
Great, thanks!

[redacted] 8/15/2024, 3:45 PM

Amplify -

https://www.tiktok.com/t/ZP81hSmcS/

All these fan videos I make for people are starting to come back to help me.

[redacted] 8/15/2024, 3:45 PM
https://www.tiktok.com/t/ZP81rN8R7/ (https://www.tiktok.com/t/ZP81rN8R7/)

[redacted] 8/15/2024, 3:48 PM
https://www.tiktok.com/t/ZP81hx3c3/

Attachment: __Libr_1(37) (19 KB)

Attachment: __Libr_1(38) (116 KB)

[redacted] 8/15/2024, 3:48 PM
Melissa here is your friend yuck

NM **Nathan Melissa** [redacted] 8/15/2024, 3:51 PM
Yes, but she's also giving you some good shout outs as well.
She's doing both, she said she had no choice because she's inundated .

[redacted] 8/15/2024, 3:51 PM
Yeah seems a bit biased to me but I'm also sensitive

[redacted] 8/15/2024, 5:25 PM
Colleen just texted this to us- first time we've heard from her

Can someone please Send jamey the actual context of what I said so he can respond to Colleen. This should be on video recorded from the wrap.
I never said I changed his fate - I said I didn't want to see him at the end of the movie as it was too complicated to explain how he was co parenting and would draw too many people in and SHE agreed. This has nothing to do with the book and we don't control the wrap and their headlines just as we don't control all the negative and untrue things she and Blake have been saying about me and the controversy they created. We haven't leaked anything and we've taken the high road the whole time even after she betrayed me and ghosted me. [url:'https://p25-content.icloud.com/M41FCB2D0C7B8332D65EDAFA3353C3FFAD4E74D191608FAC6B85F232143BE3E9C.C01USN00']



Image: __Library_SMS_Attachments_a9_09_59F605E2-58B2-41A7-B8C8-743D6583CBFE_IMG_4792.jpeg (408 KB)

JA **Jen Abel** [redacted] 8/15/2024, 5:33 PM

Jamey and I spoke. They are deleting the post. Take this opportunity open up the dialogue with her. Apologize, communicate that if you read the interview it doesn't mean he's cut out of the sequel but it was the decision of how to end the film. You explain it all in quotes within. Use this opportunity to connect with her and commiserate with what she's going through and how much you care about her and how that hasn't changed even when she TURNED HER BACK ON YOU AND LEFT YOU TO FEND FOR YOURSELF. She is getting a ton of hate and backlash from the DV community.

JA **Jen Abel** [redacted] 8/15/2024, 5:34 PM

The post has been deleted

JA **Jen Abel** [redacted] 8/15/2024, 5:34 PM

You can say that you have done nothing but honor her and her book and you want to have a conversation and you miss the relationship you had blah blah

[redacted] 8/15/2024, 5:34 PM

Can we please have our regroup with everybody, including Melissa?

[redacted] 8/15/2024, 5:39 PM

I'm sorry I don't have the capacity just right now in this moment to be the bigger person and to do that. You have to remember that it was her betrayal that landed me in the hospital. It's been devastating to me.

[redacted] 8/15/2024, 5:39 PM

This message makes my blood boil

JA **Jen Abel** [redacted] 8/15/2024, 5:44 PM

Fully understand and respect that. Jamey is working through a response. Instead of thinking of this as an olive branch, this is a tactical art of war approach. If Colleen can come around and is willing to open up lines of communication, that would be a massive message to the world that this issue solely relates to BLAKE and not to "all of the women".

[redacted] 8/15/2024, 5:46 PM

Can we all talk ? I believe this was when melissa was avail

JA **Jen Abel** [redacted] 8/15/2024, 5:46 PM

I'm avail I'll let the team chime in

MM **Matthew Mitchell** [redacted] 8/15/2024, 5:46 PM

Available as well. Whenever we can get on.

KC **Katie Case** [redacted] 8/15/2024, 5:48 PM

Happy to connect — will see if Breanna and Melissa are available as well.

[redacted] 8/15/2024, 5:53 PM

I'm going to dictate something, Jamie add this to your text message back to her in any part that you want but this is just what I need to say

Justin is not out to hurt anybody and there hasn't been one lie that has come out of his mouth, all he's been doing is singing the praises of you and everybody else and sticking to the message of the movie which you knew he cared about from the beginning. He asked you about the second book to understand the trajectory of Ryles character as he was developing the script, which you also understood as he included you on that decision. The above headline is taken completely out of context, but that is not our doing, as there is a PR war going on and we are the ones that are not leaking anything or trying to destroy anybody. This entire situation was set up to be a smear campaign against Justin and it clearly backfired. Justin didn't want any of this as he's loved and adored you for five years. if you actually read the interview you'll see he says exactly as it happened, which was a decision that you also supported. It had nothing to do with the second book or not wanting to be a part of it as an actor or changing Ryles fate. It had everything to do with after seeing an edit of the movie, realizing that we did not need to open up a can of worms and show an abuser coparenting without showing all of the necessary work that had to happen to make that possible. You also know this as he involved you every step of the way. Wayfarer is also not talking and are not firing back, we are continually speaking highly of everyone. We did not ask to be in the situation. This was all created and easily could've been avoided.

[redacted] 8/15/2024, 5:53 PM

I'm here and ready

KC **Katie Case** [redacted] 8/15/2024, 5:57 PM

Melissa will be available at 7 PM ET — does that work for the team? She's traveling at the moment and won't have good service until then.

[redacted] 8/15/2024, 6:00 PM

I didn't see this justin.
I replied already

[redacted] 8/15/2024, 6:00 PM

I think your response was way too nice dude and I'm a bit frustrated, but I understand the game you're playing

JA **Jen Abel** [redacted] 8/15/2024, 6:00 PM

Justin— please know that I'm not saying this to dismiss your completely warranted feelings about this but I would be remiss if I didn't advise that I feel strongly about you also responding from the heart since you are also on this text. It may be a futile attempt, but think of it as part of the larger strategy. I drafted something in case you might consider.

JA **Jen Abel** [redacted] 8/15/2024, 6:00 PM

I'm going to dictate something, Jamie add this to your text message back to her in any part that you want but this is just what I need to say

Justin is not out to hurt anybody and there hasn't been one lie that has come out of his mouth, all he's been doing is singing the praises of you and everybody else and sticking to the message of the movie which you knew he cared about from the beginning. He asked you about the second book to understand the trajectory of Ryles character as he was developing the script, which you also understood as he included you on that decision. The above headline is taken completely out of context, but that is not our doing, as there is a PR war going on and we are the ones that are not leaking anything or trying to destroy anybody. This entire situation was set up to be a smear campaign against Justin and it clearly backfired. Justin didn't want any of this as he's loved and adored you for five years. if you actually read the interview you'll see he says exactly as it happened, which was a decision that you also supported. It had nothing to do with the second book or not wanting to be a part of it as an actor or changing Ryles fate. It had everything to do with after seeing an edit of the movie, realizing that we did not need to open up a can of worms and show an abuser coparenting without showing all of the necessary work that had to happen to make that possible. You also know this as he involved you every step of the way. Wayfarer is also not talking and are not firing back, we are continually speaking highly of everyone. We did not ask to be in the situation. This was all created and easily could've been avoided.

JA **Jen Abel** [redacted] 8/15/2024, 6:01 PM

Whoops that's your message one sec—

[redacted] 8/15/2024, 6:02 PM

Justin should not respond right now except for anything other than to validate what I said. You are full of emotion and you were react and it could add to the fire instead of us trying to put it out. The last thing we need is Colleen speaking publicly about you in a negative way. That's all that matters right now is to put out that fire.

[redacted] 8/15/2024, 6:03 PM

I understand

JA **Jen Abel** [redacted] 8/15/2024, 6:04 PM

OK I will stand down. But leaving this here. Colleen, from my heart, there has not been one lie that has come out of my mouth. I have been sticking to the same message of the movie which you know I cared deeply about from the beginning. The headline is taken out of context which you will see from the interview. I have loved and adored you for the past five years and that hasn't changed even

JA **Jen Abel** [redacted] 8/15/2024, 6:04 PM

**remove the "even". Sorry Im having issues with my text via my computer

[redacted] 8/15/2024, 6:05 PM

I agree follow up with that. Assume, that Blake will see it. Assume that she could leak it… It should only be loving remarks. But I do think you should follow up to my message.

[redacted] 8/15/2024, 6:17 PM

Colleen, I'm sorry that you are hurting. I want you to know that there has not been one lie that has come out of my mouth or one bad word spoken about any of you. I am also not talking about my experience. I have been sticking to the same message of the movie which you know I cared deeply about from the beginning. The headline is taken out of context which you will see from the interview. I spoke about this multiple times and they also don't include everything I say. None of which has anything to do with changing his trajectory in the second book which I of course asked about multiple times to understand where the story goes. You supported my decision to remove him from the end. We do not control the headlines. Since this is the first time I've heard from you, I just want you to know that I have cared you for the past five years and that hasn't changed.

[redacted] 8/15/2024, 6:18 PM

Colleen, I'm sorry that you are hurting. I want you to know that there has not been one lie that has come out of my mouth or one bad word spoken about any of you. I am also not talking about my experience. I have been sticking to the same message of the movie which you know I cared deeply about from the beginning. The headline is taken out of context which you will see from the interview. I spoke about this multiple times and they also don't include everything I say. None of which has anything to do with changing his trajectory in the second book which I of course asked about multiple times to understand where the story goes. You supported my decision to remove him from the end. We do not control the headlines. Since this is the first time I've heard from you, I just want you to know that I have cared about you for the past five years and that hasn't changed.

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JA **Jen Abel** [redacted] 8/15/2024, 6:19 PM

Loved "Colleen, I'm sorry that you are hurting. I want yo…"

[redacted] 8/15/2024, 6:22 PM

So when are speaking ?

KC **Katie Case** [redacted] 8/15/2024, 6:22 PM

Link for our 7 PM ET call: https://us06web.zoom.us/j/84208560789?pwd=l05av7eSsaYzdDUoXwA3qHCoutmZhE.1 (https://us06web.zoom.us/j/84208560789?pwd=l05av7eSsaYzdDUoXwA3qHCoutmZhE.1)

[redacted] 8/15/2024, 6:25 PM

Colleen, I'm sorry that you are hurting. I want you to know that I have no told any lies about you or any others. I am also not talking about my experience. I have been sticking to the same message of the movie which you know I cared deeply about from the beginning. The headline is taken out of context which you will see from the interview. I spoke about this multiple times and they also don't include everything I say. None of which has anything to do with changing his trajectory in the second book which I of course asked you about multiple times to understand where the story goes. You supported my decision to remove him from the end. We do not control the headlines. Since this is the first time I've heard from you, I just want you to know that I have deeply cared about you for the past five years and that hasn't changed.

[redacted] 8/15/2024, 6:25 PM

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[redacted] 8/15/2024, 6:27 PM

Colleen, I'm sorry that you are hurting. I want you to know that have not lied or spoken ill of you. I am also not talking about my experience. I have been sticking to the same message of the movie which you know I cared deeply about from the beginning. The headline is taken out of context which you will see from the interview. I spoke about this multiple times and they also don't include everything I say. None of which has anything to do with changing his trajectory in the

second book which I of course asked you about multiple times to understand where the story goes. You supported my decision to remove him from the end of the movie and there has been no talk about him in a sequel. We do not control the headlines. Since this is the first time I've heard from you, I just want you to know that I have deeply cared about you for the past five years and that hasn't changed.

JA **Jen Abel** [redacted] 8/15/2024, 6:29 PM
I like this

JA **Jen Abel** [redacted] 8/15/2024, 6:39 PM
Did you send?

[redacted] 8/15/2024, 6:39 PM
Yes.

JA **Jen Abel** [redacted] 8/15/2024, 6:39 PM
I know how much this absolutely sucks but that was a smart, strategic move. If that helps at all

NM **Nathan Melissa** [redacted] 8/15/2024, 6:40 PM
Loved "I know how much this absolutely sucks but that was…"

NM **Nathan Melissa** [redacted] 8/15/2024, 6:40 PM
And if this was ever shared- it still looks great and honest

JA **Jen Abel** [redacted] 8/15/2024, 6:43 PM
Speak in 15 min

[redacted] 8/15/2024, 6:45 PM
"It just feels like I'm on an island, here. When the hate is being directed at me, you guys posting that article and allowing it to fuel the comments is hurtful. And the timing of it just feels like you're worried about your image but not the women who are behind this story. I know things took an awful turn, and I felt forced to choose when I did not want to, but the back and forth articles from both camps are just so upsetting and ridiculous. It's making everyone working on this movie look immature. Everyone is out there trying to save themselves and now this has turned into a huge mess. And I know you guys think I've made decisions for certain reasons but I have felt the rift from long before I ever was in contact with Blake. It started with me not being allowed to read the script until I was sat with readers, but then all the interviews made it seem like you included me in the script from the beginning. Then the whole documentary thing where I said no so very many times. And the book, when I asked you guys to at least donate a portion of the proceeds to DV and then I was told the only way a donation would be made is if I took 1% and donated that myself. Then the whole tattoo thing, all the texts of you blaming Blake for that and reiterating that she didn't read the book every time I'd just try to ask you what to say to readers. I have been disappointed personally by your actions many times. I appreciate that you haven't directly said anything negative, that's how it should be. But you are grown men with a platform. You know how to use it to protect your image. Please don't continue to use it to harm me or mine. That's all I'm asking. "

[redacted] 8/15/2024, 7:16 PM
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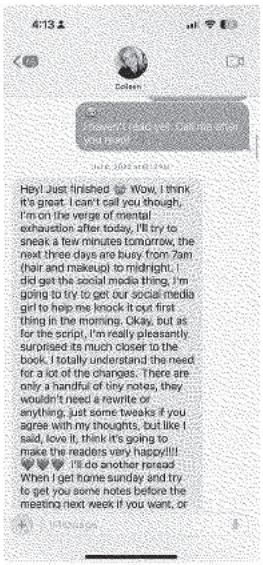


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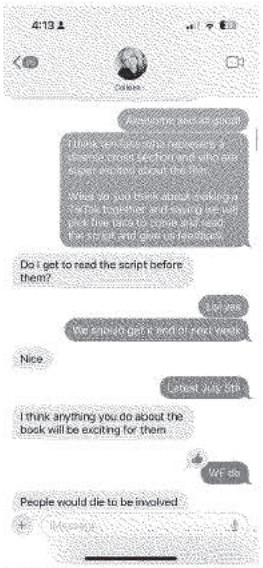


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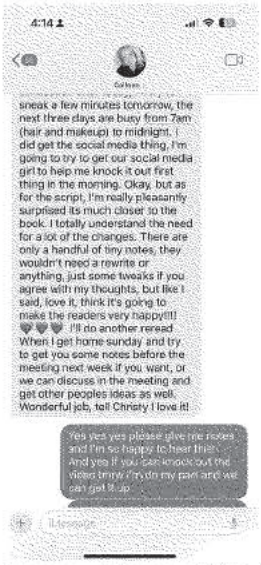


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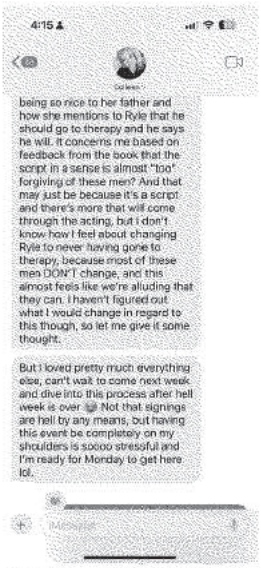


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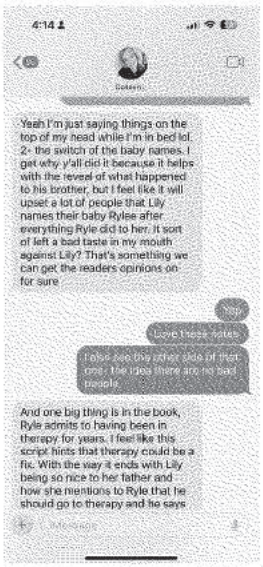


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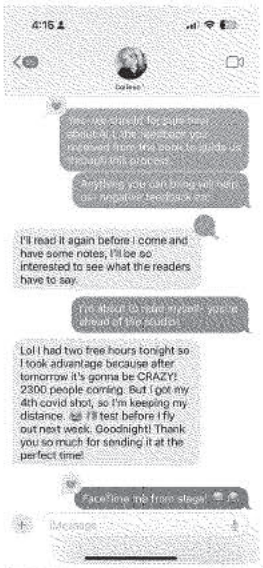


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\# [redacted] 8/15/2024, 7:27 PM

[url:'https://p67-content.icloud.com/M41FCB2D0C7B8332D65EDAFA3353C3FFAD4E74D191608FAC6B85F232143BE3E9C.C01USN00']
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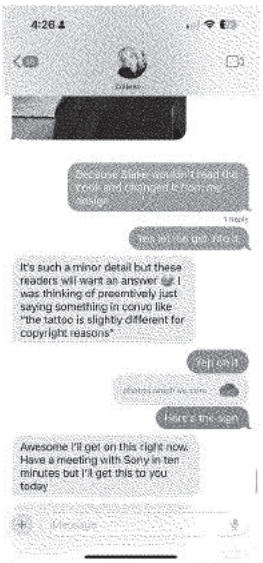


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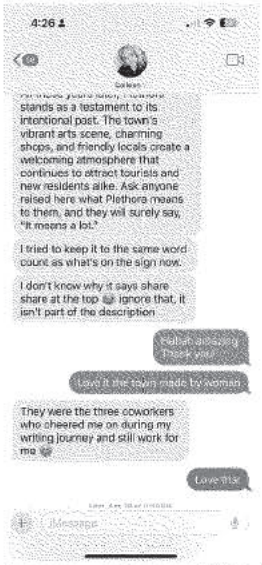


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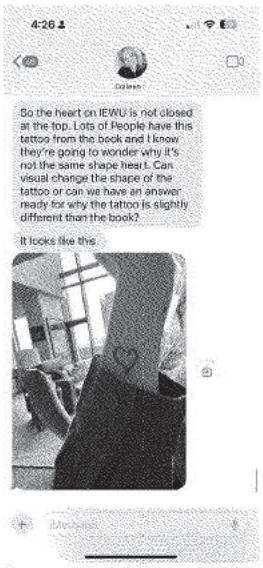


Image: __Library_SMS_Attachments_f9_09_D64FEDA5-0EEC-43E6-9FE4-A3DADA03C469_IMG_4802.jpeg (143 KB)

Exhibit 20

PR Thread w/TAG

Thread Participants: [redacted] Jamey Heath; [redacted] Jen Able ; [redacted] Justin B (Owner); [redacted] Katie TAG; [redacted] Brianna TAG; [redacted] Melissa TAG; [redacted] Matthew Mitchell; [redacted] Jennifer Able

Active Participants: [redacted] Justin B (Owner); [redacted] Brianna TAG; [redacted] Melissa TAG; [redacted] Matthew Mitchell; [redacted] Jennifer Able

First Message: 8/18/2024 1:37:22 AM

Last Message: 8/18/2024 6:52:32 PM

[redacted] **Justin B (Owner)**
Did you guys hear we got stuck in an elevator at AMC
8/18/2024 1:37:22 AM

[redacted] **Justin B (Owner)**
lol
8/18/2024 1:37:28 AM

[redacted] **Jennifer Able**
Oh my god the videos are hilarious
8/18/2024 1:45:39 AM

[redacted] **Jennifer Able**
I'll share with the team in the am
8/18/2024 1:45:45 AM

[redacted] **Matthew Mitchell**
Emphasized "Did you guys hear we got stuck in an elevator at A…"
8/18/2024 1:58:23 AM

[redacted] **Matthew Mitchell**
Can't wait to see. Hahaha
8/18/2024 1:58:31 AM

[redacted] **Justin B (Owner)**
To boost
8/18/2024 12:56:27 PM

[redacted] **Justin B (Owner)**
https://www.tiktok.com/t/ZP81Pn5Rm/
<__Library_SMS_Attach_1_b8_08_CE1712_1_991137_1>
<__Library_SMS_Attach_1_76_06_7A65F3_1_BF5DC3_1>
8/18/2024 12:56:31 PM

[redacted] Justin B (Owner)
https://www.tiktok.com/t/ZP81P3U66/
<__Library_SMS_Attach_1_0d_13_68F968_1_FA5E00_1>
<__Library_SMS_Attach_1_de_14_A848C4_1_26E974_1>
8/18/2024 1:03:57 PM

[redacted] Justin B (Owner)
To boost
8/18/2024 1:03:57 PM

[redacted] Justin B (Owner)
https://www.tiktok.com/t/ZP815JcqC/
<__Library_SMS_Attach_1_0e_14_39ED5C_1_4EFE6B_1>
<__Library_SMS_Attach_1_bb_11_9DFBE9_1_E795A7_1>
8/18/2024 1:07:19 PM

[redacted] Brianna TAG
Will let digital know!
8/18/2024 1:08:39 PM

[redacted] Justin B (Owner)
And this was the stuck in the elevator intro
8/18/2024 1:08:42 PM

[redacted] Justin B (Owner)
https://www.tiktok.com/t/ZP81PKYWu/
<__Library_SMS_Attach_1_70_00_C9BDBB_1_C2C4BE_1>
<__Library_SMS_Attach_1_dd_13_41FF4B_1_6748DE_1>
8/18/2024 1:08:44 PM

[redacted] Jennifer Able
Yes definitely let's boost these vids. I sent our digital team the vids that were shot and they will edit something funny together for next week to post.
8/18/2024 1:10:52 PM

[redacted] Justin B (Owner)
Hey Tag team, I've been seeing some IG comments on random posts defending me by people who are private with no followers and they feel like bots. Can you please confirm we are not doing any of that? I really don't want bots defending me as it feeds into their potential narrative
8/18/2024 6:02:04 PM

[redacted] **Melissa TAG**
I can fully fully confirm we do not have bots . This is not also what we do- bots look fake to anyone.

The other team is doing something very specific in terms of what they do. I know Jamey &Jed connected on this.

Bots and fan accounts also run pretty organically by now with all the AI platforms and Google Analytics itself - there is no bot army that's a myth these days.

Any digital team these days is far more intelligent to utilise something so obvious.

8/18/2024 6:06:43 PM

[redacted] **Justin B (Owner)**
Ok thank you 🙏❤️
8/18/2024 6:08:43 PM

[redacted] **Justin B (Owner)**
How's everyone today ? Anything new
8/18/2024 6:08:51 PM

[redacted] **Melissa TAG**
Nothing new today. All looking good- we still have a little way to go. I would say about a week left staying extra cautious..
8/18/2024 6:27:33 PM

[redacted] **Justin B (Owner)**
Loved "Nothing new today. All looking good- we still have..."
8/18/2024 6:31:28 PM

[redacted] **Justin B (Owner)**
I appreciate you all. Thanks for helping me get through this
8/18/2024 6:37:36 PM

[redacted] **Melissa TAG**
Loved "I appreciate you all. Thanks for helping me get th..."
8/18/2024 6:37:48 PM

[redacted] **Melissa TAG**
#teamJB ✨
8/18/2024 6:38:05 PM

[redacted] **Justin B (Owner)**
Loved "#teamJB ✨"
8/18/2024 6:52:32 PM

Exhibit 21

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 9	Date Range: 7/25/2024

Outline of Conversations

[redacted] • 9 messages on 7/25/2024 • Justin Baldoni [redacted] • Stephanie Jones

Messages in chronological order (times are shown in GMT -04:00)

[redacted]

SJ **Stephanie Jones** [redacted] ◄ 7/25/2024, 6:27 PM
I wasn't aware there was a call. i'm so sorry. I'm on with Jen now.

Receipts • Justin Baldoni [redacted] [D:7/25/2024, 6:27 PM]

> SJ **Stephanie Jones** [redacted] ◄ 7/25/2024, 6:27 PM
yall add me to group chat.

Receipts • Justin Baldoni [redacted] [D:7/25/2024, 6:27 PM]

>> SJ **Stephanie Jones** [redacted] ◄ 7/25/2024, 6:28 PM
i have a plan. this is going to be ok. you are not just walking carpet. you are absolutely going to be inside amc union square and give speech on stage. this is YOUR movie.

Receipts • Justin Baldoni [redacted] [D:7/25/2024, 6:28 PM]

>>> JB **Justin Baldoni** [redacted] ► 7/25/2024, 6:32 PM
Hey, it's 12:30 AM here and going to bed. It's very complicated Steph, this is my family and livelihood and reputation … but please talk through it with Jamey and Jen. Yes our plan is to go back and ask Sony to fight to have me in the room and I won't take pictures or interact with the cast at all or go to the after party…
Every time we fight back things get worse and yet we can't just roll over again on this one. at this point with her getting the entire cast to unfollowedunfollowed me it's very clear she's preparing for something. It's just unbelievable at this point.

Receipts • Stephanie Jones [redacted] [R:7/25/2024, 6:33 PM]

>>>> SJ **Stephanie Jones** [redacted] ◄ 7/25/2024, 6:34 PM
she's calling your bluff. i promise.

Receipts • Justin Baldoni [redacted] [D:7/25/2024, 6:34 PM]

>>>>> SJ **Stephanie Jones** [redacted] ◄ 7/25/2024, 6:34 PM
what will she do if you show up? she will look like a jerk if she leaves. she won't.

Receipts • Justin Baldoni [redacted] [D:7/25/2024, 6:34 PM]

>>>>> > SJ **Stephanie Jones** [redacted] ◄ 7/25/2024, 6:35 PM
it's truly unbelievable and i'm so sorry. my heart breaks for you. please know i have your back and nothing is going to happen on my watch. I will tell jamey we need that briefing doc of historical info asap so we are armed. i worked with tera on crisis pr people and i think female one would be good.

Receipts • Justin Baldoni [redacted] [D:7/25/2024, 6:35 PM]

>>>>> >> JB **Justin Baldoni** [redacted] ► 7/25/2024, 6:44 PM
🙏

Receipts • Stephanie Jones [redacted] [R:7/25/2024, 6:54 PM]

>>>>> >>> JB **Justin Baldoni** [redacted] ► 7/25/2024, 6:55 PM
Liked "it's truly unbelievable and i'm so sorry. my heart…"

Receipts • Stephanie Jones [redacted] [R:7/25/2024, 6:55 PM]

Exhibit 22

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 4	Date Range: 8/5/2024

Outline of Conversations

[redacted] • 4 messages on 8/5/2024 • Jennifer Abel [redacted] • Stephanie Jones

Messages in chronological order (times are shown in GMT -04:00)

[redacted]

SJ **Stephanie Jones** [redacted] ◄ 8/5/2024, 5:53 PM
how did justin do today?

Receipts • Undefined Participant [D:8/5/2024, 5:53 PM]

> JA **Jennifer Abel** [redacted] ► 8/5/2024, 5:55 PM
Went so so well. He answered the questions really well and even started leaning into how he brought on a female intimacy coordinator during pre production and how he felt it necessary to step back so the women could lead the intimacy scenes via a female lens

Receipts • Undefined Participant [R:8/5/2024, 5:56 PM]

>> SJ **Stephanie Jones** [redacted] ◄ 8/5/2024, 5:56 PM
Loved "Went so so well. He answered the questions really …"

Receipts • Undefined Participant [D:8/5/2024, 5:56 PM]

>>> SJ **Stephanie Jones** [redacted] ◄ 8/5/2024, 5:56 PM
oh good

Receipts • Undefined Participant [D:8/5/2024, 5:56 PM]

Short Message Report

Conversations: 1	Participants: 3
Total Messages: 29	Date Range: 8/6/2024

Outline of Conversations

[redacted] • 29 messages on 8/6/2024 • Jennifer Abel [redacted] • Stephanie Jones

Messages in chronological order (times are shown in GMT -04:00)

[redacted]

SJ **Stephanie Jones** [redacted] ◄ 8/6/2024, 2:48 PM
in london and by big ben and staying at corinthia hotel. reminds me of when we were here.

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 2:48 PM]

> SJ **Stephanie Jones** [redacted] ◄ 8/6/2024, 2:48 PM
😍

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 2:48 PM]

>> JA **Jennifer Abel** [redacted] ► 8/6/2024, 7:23 PM
HI!!!! Omg I'm just seeing this so so sorry. I'm getting on the next plane out there to sightsee with you guys 😭😭😭😭

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:03 PM]

>>> JA **Jennifer Abel** [redacted] ► 8/6/2024, 7:23 PM
At the premiere. Justin did so well. Blake is so horrible.

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:03 PM]

>>>> SJ **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:24 PM
oh no what did she do?

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:24 PM]

>>>>> SJ **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:24 PM
i'm in london and can't sleep bc i'm jet lag

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:24 PM]

>>>>> > JA **Jennifer Abel** [redacted] ► 8/6/2024, 8:27 PM
She's just horrible. Made this whole press and premiere process so difficult and impossible for Justin to enjoy. It's just sad.

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:27 PM]

>>>>> >> JA **Jennifer Abel** [redacted] ► 8/6/2024, 8:27 PM
Ugh I'm sorry

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:27 PM]

>>>>> >>> JA **Jennifer Abel** [redacted] ► 8/6/2024, 8:27 PM
It's raining like crazy here and the carpet flooded when Blake arrived. Karma lol.

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:27 PM]

>>>>> >>>> SJ **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:28 PM
oooof really? lol. i saw pics of hugh and ryan. hugh looks so old all of a sudden

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:28 PM]

>>>>> >>>>> SJ **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:28 PM
made me depressed

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:28 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:29 PM
>>>>> leslie reps ryan and blake now too someone at vision pr told me last week i forgot to tell you about. i never knew that
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:29 PM]

>>>>> **Jennifer Abel** [redacted] ► 8/6/2024, 8:31 PM
>>>>> I didn't know that either
JA

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:34 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:35 PM
>>>>> taylor didn't come to premiere i guess
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:35 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:35 PM
>>>>> she's here on tour next week
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:35 PM]

>>>>> **Jennifer Abel** [redacted] ► 8/6/2024, 8:36 PM
>>>>> Thank god
JA

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:42 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:43 PM
>>>>> when do you fly back to La?
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:43 PM]

>>>>> **Jennifer Abel** [redacted] ► 8/6/2024, 8:43 PM
>>>>> Go to Chicago on Thursday and fly back to La on Friday night. Although now it might be Saturday because Justin wants to do theater visits lol
JA

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:43 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:44 PM
>>>>> wait chicago?
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:44 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:44 PM
>>>>> is MM going too?
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:44 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:44 PM
>>>>> chicago is so beautiful right now and it's so clean and nice.
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:44 PM]

>>>>> **Stephanie Jones** [redacted] ◄ 8/6/2024, 8:44 PM
>>>>> i love chicago
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:44 PM]

>>>>> **Jennifer Abel** [redacted] ► 8/6/2024, 8:45 PM
>>>>> Me too but this is such a long week lol
JA

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:45 PM]

>>>>> **Stephanie Jones** [redacted] ◀ 8/6/2024, 8:46 PM
>>>>> i always liked press junkets bc i got to catch up quickly with everyone but you're really just sitting a lot so can catch up on emails too. it was always freezing at DJs
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:46 PM]

>>>>> **Jennifer Abel** [redacted] ▶ 8/6/2024, 8:48 PM
>>>>> Oh no Justin wants to pause and recap after every interview
JA

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:49 PM]

>>>>> **Stephanie Jones** [redacted] ◀ 8/6/2024, 8:49 PM
>>>>> lol but you just tell him you're making meticulous notes for overall recap
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:49 PM]

>>>>> **Stephanie Jones** [redacted] ◀ 8/6/2024, 8:49 PM
>>>>> he's so cute
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:49 PM]

>>>>> **Jennifer Abel** [redacted] ▶ 8/6/2024, 8:49 PM
>>>>> Hahahaha smart
JA

Receipts • Stephanie Jones [redacted] [R:8/6/2024, 8:49 PM]

>>>>> **Stephanie Jones** [redacted] ◀ 8/6/2024, 8:50 PM
>>>>> he overthinks like me so i get it. i can't imagine being interviewed so many times in a day for junket. it's hard enough as it is. but then 20 times. it's energy draining
SJ

Receipts • Jennifer Abel [redacted] [D:8/6/2024, 8:50 PM]

Exhibit 23

Message

From: Henry Hargitai [redacted]
Sent: 8/8/2024 12:09:01 PM
To: WayfarerStudios [redacted]; Team Baldoni [redacted]; TeamJBSocial [redacted]
CC: Stephanie Jones [redacted]
Subject: Justin Baldoni social monitoring

Hey team,

Wanted to pass along some social monitoring from accounts talking about JB and It Ends With Us. Because social clips/tweets are constantly coming in, we'll also share with you our live document where we'll continue to add throughout the day.

TikTok

@JennaRedfield Speculation 2.2M
@JennaRedfield Speculation Idea List 5554.4K
@Jenna Redfield Inside Scoop DMs 250 (Just Posted)

@ClaireNotDanes Speculation 1.6M
@ClaireNotDanes on Jenny Slate Interview 170.2K

@NadiaGReads Speculation 593.6K
@NadiaGReads Speculation P2 288.2K

@JadelBrito JB Protecting His Peace 495. 3K

Deadline- Jenny Slate on Justin Baldoni 114.7K

@SammySamsLife Speculation 790.3K

The Hollywood Reporter- Justin Baldoni on DV - 853.5K

Ryan Reynolds Involvement 20.3K

@girlwithnojob 608.9K
@girlwithnojob 2 - 50.7K

@todayshow - Justin on the Today Show - 25.3K

@bootzwiththefurr - Viral Tiktok - 1.2M

X

Jenny Slate Interview 4M

JB on DV 1.5K

Colleen Hoover Drama 7.7K

Drama Meme - 51K

Drama Meme- 56K

Drama Meme- 34K

Instagram

People Magazine

Exhibit 24

Message

From: Jennifer Abel [redacted]
Sent: 8/8/2024 7:55:22 PM
To: Gordon Duren [redacted]; Team Baldoni [redacted]
CC: Rachel Greenblatt [redacted]; Stephanie Jones [redacted]
Subject: Re: The Hollywood Reporter Request

Thanks this is handled x

From: Gordon Duren [redacted]
Sent: Thursday, August 8, 2024 6:52 PM
To: Team Baldoni [redacted]
Cc: Rachel Greenblatt [redacted]; Stephanie Jones [redacted]
Subject: FW: The Hollywood Reporter Request

Sharing with larger team as I know Jen/Matthew are onsite.

Gordon Duren | Chief of Staff
www.jonesworks.com

JONESWORKS observes 'Summer Fridays' from Memorial Day to Labor Day.
While our offices will be closing at 1pm PT/ET, we will still be checking email periodically and are reachable via phone for any timely matters.

From: Carly Thomas [redacted]
Date: Thursday, August 8, 2024 at 7:42 PM
To: Jennifer Abel [redacted], Stephanie Jones [redacted], [redacted]
Subject: The Hollywood Reporter Request

Some people who received this message don't often get email from [redacted] Learn why this is important

Hi Jennifer and Stephanie!

I'm Carly with THR and we wanted to reach out about a story we're going to be publishing later today surrounding the alleged 'It Ends With Us' drama circulating on social media. We have from multiple sources info about the conflicting cuts of the film, from Blake Lively and Justin Baldoni, and about them not having a close relationship. But we wanted to see if Justin has any background info to share from his end or wanted to weigh in on the matter?

Thank you,
Carly

The Hollywood Reporter

Carly Thomas
Associate Editor, Online

11175 SANTA MONICA BOULEVARD, LOS ANGELES, CA 90025
hollywoodreporter.com | E: [redacted]

Exhibit 25

Message

From: Jennifer Abel [redacted]
Sent: 8/9/2024 10:48:11 AM
To: Stephanie Jones [redacted]; Tera Hanks [redacted]; Jamey Heath [redacted]; WayfarerStudios [redacted]; Team Baldoni [redacted]
Subject: Re: Daily Mail Request: Justin Baldoni 'This Ends with Us'

Thanks this is being handled.

From: Stephanie Jones [redacted]
Sent: Friday, August 9, 2024 9:44 AM
To: Tera Hanks [redacted]; Jamey Heath [redacted]; WayfarerStudios [redacted]; Team Baldoni [redacted]
Subject: Fwd: Daily Mail Request: Justin Baldoni 'This Ends with Us'

Stephanie Jones
www.jonesworks.com

Begin forwarded message:

From: James Vituscka [redacted]
Date: August 9, 2024 at 3:41:21 PM GMT+1
To: Jennifer Abel [redacted], Stephanie Jones [redacted]
Subject: Daily Mail Request: Justin Baldoni 'This Ends with Us'

Some people who received this message don't often get email from [redacted] Learn why this is important

Hello,

This is James - a Sr. Reporter with DailyMail.com.

We have learned that Justin Baldoni caused issues on the set of It Ends with Us and that he clashed with many cast members, as well as Colleen Hoover.

Sources have told us that the women on set felt he was 'borderline abusive, unprofessional and unapologetic' and that he 'failed to consider Blake's character's perspective.'

We were also told that parts of the script needed to be rewritten as a result, which he took personally.

The cast is currently not talking about this because they do not want it to take away from their promotional work, or the film's release.

Many feel Justin's acting was undoubtedly phenomenal and he could receive awards nods, but there are concerns he could defend his actions with his style of acting, which is method.

Please let me know if you would like to comment either on or off-record.

James

James Vituscka

US SHOWBIZ
Senior Reporter

Daily Mail .com

www.dailymail.com
[redacted]

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Exhibit 26

From: Matthew Mitchell [redacted]
Sent: Fri, 9 Aug 2024 08:20:57 -0400 (EDT)
To: Stephanie Jones [redacted] WayfarerStudios [redacted]; Team Baldoni [redacted]; Jamey Heath [redacted]; Tera Hanks [redacted]
Subject: Re: Justin Baldoni/It Ends With Us

Will handle.
Thanks Steph.

From: Stephanie Jones [redacted]
Sent: Friday, August 9, 2024 4:11 AM
To: WayfarerStudios [redacted]; Team Baldoni [redacted]; Jamey Heath [redacted]; Tera Hanks [redacted]
Subject: Fwd: Justin Baldoni/It Ends With Us

good morning from london. please see below inquiry.

Begin forwarded message:

> **From:** Daniel Welsh [redacted]
> **Date:** August 9, 2024 at 9:39:51 AM GMT+1
> **To** [redacted] Stephanie Jones [redacted]
> **Subject: Justin Baldoni/It Ends With Us**
>
> You don't often get email from daniel.welsh@id.huffpost.co.uk. Learn why this is important
>
> Hey folks, hope you're well,
>
> I just wanted to ask if there was any comment on behalf of Justin Baldoni re: this story?
>
> https://www.standard.co.uk/lifestyle/it-ends-with-us-cast-drama-is-quickly-turning-it-into-the-next-don-t-worry-darling-b1175468.html
>
> Any statement/guidance would be much appreciated!
>
> Cheers,
>
> Daniel

Exhibit 27

Short Message Report

Conversations: 1	Participants: 7
Total Messages: 1	Date Range: 8/9/2024

Outline of Conversations

chat453561154421812013 • 1 message on 8/9/2024 • Jamey Heath [redacted] • Jennifer Abel [redacted] • Matthew Mitchell [redacted] • Stephanie Jones [redacted] • Stephanie Jones [redacted] • Tera Hanks [redacted]

Messages in chronological order (times are shown in GMT -04:00)

chat453561154421812013

SJ **Stephanie Jones** [redacted] ◀ 8/9/2024, 3:06 PM

People Mag says…

Notably, Baldoni has been largely absent from grouped promotional appearances, including at the New York premiere where he didnt pose with his costars and didn't introduce the film ahead of the screening.

He introduced at screening so let's please have corrected. Thanks!

Exhibit 28

From: Stephanie Jones [redacted]
Sent: Wed, 14 Aug 2024 14:29:05 -0400 (EDT)
To: Jamey Heath [redacted]
Cc: Tera Hanks [redacted]; imene meziani [redacted]; Mara Canner [redacted]
Subject: Re: Blake Lively Felt Justin Baldoni Fat-Shamed Her, Kissed Too Long During Scene
Attachments: Steph Jones Phone Records August 8 2024.pdf

Hi Jamey,

I have been standing down and have not contacted any press at all regarding any of these Justin issues since they arose on Thursday of last week while I was on family vacation in Europe. I wanted to take a moment to reiterate my commitment to Justin and our work together. Over the past eight years, I have successfully managed every crisis for Justin without any negative press coming to light. As a key member of both Justin's and Wayfarer's account since we signed him, I believe if one of our team members, including me as a keyman on Justin's account, can rectify a story, it's essential we leverage that for Justin and Wayfarer.

While my background isn't solely in crisis management, I have extensive experience representing our billionaire clients, many of the biggest stars and athletes in the world, as well as many of our Fortune 50 founder clients. This experience has equipped me with the skills necessary to navigate complex situations effectively, often more diligently than the crisis pr firms we have worked with in the past.

My recommended strategy would be twofold:

1. **Flood the Zone with Positives**: We need to ensure that we promote positive narratives that media outlets cannot ignore. Currently, most stories are heavily biased towards Blake's perspective, leaving Justin unrepresented. It's crucial that we fight for every inch of every story, which requires far more effort than typical crisis PR want to put forth in our experience working with specialized crisis teams.

2. **Prepare Alternate Stories**: We should mobilize a robust network of supporters and third-party advocates ready to counter these narratives on deep background as well as some on the record, making it clear that the claims being made are untrue and unfounded.

As you know, I've been on vacation in Europe with my entire family. I've attached my Verizon call log from last week in response to your claim that someone at Sony suggested I called the Daily Mail and escalated things. I can confirm that I did not make or receive any calls from Daily Mail - the number I thought I returned call from was regarding our client Tom Brady. Lillian Gissen from Daily Mail's cell number is noted in her email - [redacted] and you can cross-reference this against my call log for verification that she did not call me, nor did I call her

Studios often look for leaks, which is why per Jen Abel's text to all of us, the Sony President first texted Jen Abel, and in her words "accused her of leaking information to the Daily Mail". He then text me shortly thereafter. I ask that you please refrain from using me as a scapegoat for leaks that are clearly originating from elsewhere.

I am ready, willing, and able to fulfill my duties to support Justin per our contract which concludes May 2025.

I can add tremendous value to our efforts, and I hope you will reconsider my involvement.

Thank you,

Stephanie Jones

Stephanie Jones

www.jonesworks.com

<!--[if !supportLineBreakNewLine]-->
<!--[endif]-->

> On Aug 14, 2024, at 5:49 PM, Jamey Heath [redacted] wrote:
>
> Hi Stephanie,

We are fully aware of all of this and we are handling.

As a reminder to my previous instructions, please do not respond, contact or do anything as it pertains to Justin or Wayfarer. We have the team that we are comfortable with to handle this and while you may have thoughts and ideas, I am reiterating to stand down.

Thank you!

Jamey

<!--[if !supportLineBreakNewLine]-->
<!--[endif]-->



Jamey Heath

CEO

Wayfarer Studios

[redacted]

<!
–
[if !
supportLineBreakNewLine]
–
>

<!
–
[endif]
–
>

<!--[if !supportLineBreakNewLine]-->
<!--[endif]-->

On Aug 14, 2024, at 8:56 AM, Stephanie Jones [redacted] wrote:

Hi both Mirror just emailed us about this TMZ Report. I dont see any incoming inquires from TMZ but I've had to contact Harvey who founded TMz in past about stories they publish so Im happy to contact him to get this stoty fixed/removed if Melissa cannot. I think its important we work as team and collectively to tackle this influx stories as with recent ones Im seeing, we dont even have background to balance out story so its not biased.

https://www.tmz.com/2024/08/14/blake-lively-justin-baldoni-fat-shamed-it-ends-with-us/

Stephanie Jones

www.jonesworks.com

Exhibit 29

Message

From: Melissa N [redacted]
Sent: 8/22/2024 10:51:46 AM
To: Stephanie Jones [redacted]
CC: Jamey Heath [redacted]; Tera Hanks [redacted]; Matthew Mitchell [redacted]
Subject: Re: MailOnline request for comment

Thank you.

Sent from my iPhone

On 22 Aug 2024, at 03:24, Stephanie Jones [redacted] wrote:

Hi Melissa - we received the below at 5:24am ET. She says she's running the repeat story in the next hour.

Stephanie Jones
www.jonesworks.com

Begin forwarded message:

From: Gina Kalsi [redacted]
Date: August 22, 2024 at 5:24:34 AM EDT
To: Jennifer Abel [redacted], Stephanie Jones [redacted]
Subject: MailOnline request for comment

Some people who received this message don't often get email from [redacted] Learn why this is important

Hi Jennifer and Stephanie,

I hope you are both well? We are running a piece today that repeats the claims in the below article.

I noticed that our US office reached out but there does not appear to be a comment.

Just wanted to give you the opportunity to respond again in our fresh article, due to be set live within the next hour or so. We can also add a comment in after it is live.

Many thanks,
Gina

https://www.dailymail.co.uk/tvshowbiz/article-13743293/blake-lively-fat-shamed-justin-baldoni-ends-us.html

<Outlook-4glx23df.png>
Gina Kalsi, Femail Reporter

MailOnline | [redacted]

E: [redacted]

London | New York | Los Angeles | Sydney

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Dkt. No. 945

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN BALDONI, JAMEY HEATH, STEVE SAROWITZ, IT ENDS WITH US MOVIE LLC, MELISSA NATHAN, THE AGENCY GROUP PR LLC, JENNIFER ABEL, JED WALLACE, and STREET RELATIONS INC.,

Defendants.

JENNIFER ABEL,

Third-Party Plaintiff,

-v-

JONESWORKS LLC,

Third-Party Defendant.

Case No. 1:24-cv-10049-LJL
(consolidated with 1:25-cv-00449-LJL)

MEMORANDUM OF LAW IN SUPPORT OF THIRD-PARTY PLAINTIFF JENNIFER ABEL'S MOTION FOR CONDITIONAL SUMMARY JUDGMENT

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Third-party plaintiff Jennifer Abel ("Abel") respectfully submits this Memorandum of Law in support of her motion for conditional summary judgment against third-party defendant Jonesworks LLC ("Jonesworks") on her Second Cause of Action for common law indemnification. For the reasons set forth herein, Abel's motion should be granted.

PRELIMINARY STATEMENT

Abel was employed by Jonesworks to render public relations services to its clients, such as Justin Baldoni ("Baldoni") and Wayfarer Studios LLC ("Wayfarer") (collectively, the "Wayfarer Clients"). At Jonesworks' direction, Abel performed public relations activities for the Wayfarer Clients, including in connection with the film *It Ends With Us* (the "Film"). In late July 2024/early August 2024, public commentary circulated concerning purported on-set strife between Baldoni and the Film's co-star, plaintiff Blake Lively ("Plaintiff" or "Lively"). Abel and other Jonesworks employees discussed how to garner positive publicity and to minimize negative publicity for the Wayfarer Clients, as was within Abel's scope of employment with Jonesworks.

In breach of Jonesworks' contractual and fiduciary duties to the Wayfarer Clients, Jonesworks Chief Executive Officer Stephanie Jones ("Jones") inexplicably and covertly advised Lively of the Wayfarer Clients' public relations activities. Lively then caused her entity Vanzan, Inc. ("Vanzan") to commence a frivolous lawsuit in New York state court against "John Does" devoid of any reference to the Wayfarer Clients or Abel. Jonesworks participated in the hoax orchestrated by Lively by generously complying with a knowingly invalid subpoena from Vanzan (*i.e.*, Lively) which sought the Wayfarer Clients and Abel's communications, and which any other recipient thereof would have moved to quash. Based upon those communications, Lively manufactured a claim against Abel for allegedly aiding and abetting "retaliation" when, in truth, Abel merely engaged in standard public relations activities.

Abel's actions at issue herein were *all* undertaken as a Jonesworks employee, within the scope of her employment, and were foreseeable by and known to Jonesworks. Therefore, under well-established New York law, Abel is entitled to common law indemnification from Jonesworks, regardless of whether Jones realized, at the time Jones betrayed her then-clients (the Wayfarer Clients), that her unwavering alliance with Lively resulted in Jonesworks' own potential liability.[1]

STATEMENT OF FACTS

Jonesworks Hires Abel

Founded by Jones, the firm's current chief executive officer, Jonesworks provides, *inter alia*, public relations services to its clientele. (Local Rule 56.1 Statement by Third Party Plaintiff Jennifer Abel ("56.1"), ¶10; Declaration of Jennifer Abel, dated November 11, 2025 ("Abel Decl."), ¶ 4; Declaration of Kevin Fritz, dated November 11, 2025, ("Fritz Decl."), Ex. C at 32:7-33:16)).

On or about July 9, 2020, Jonesworks hired Abel, a publicist, as Vice President. (56.1 ¶¶ 9, 16; Fritz Decl., Ex. A, ¶ 16; Ex. B, ¶ 16; *see also* Abel Decl., ¶¶ 3, 5[2]; Abel Decl., Ex. 1). As a condition of her employment, Abel executed a Non-Disclosure and Intellectual Property Rights and Non-Solicitation Agreement ("2020 Employment Agreement"). (56.1 ¶ 11; Fritz Decl. Ex. A, ¶ 17; Ex. B, ¶ 17; Abel Decl., ¶ 6; Abel Decl., Ex. 2). Under the terms of the 2020 Employment Agreement, Jonesworks hired Abel as an at-will employee. (56.1 ¶ 12; Fritz Decl.,

[1] Abel expressly reserves all rights in connection with her other third-party claims herein and her counterclaims in *Jones v. Abel* (25-cv-00779), including with respect to choice/conflict of laws.

[2] *See also* Deadline Article, dated February 16, 2023, "Jennifer Abel Named Partner at Jonesworks" (https://deadline.com/2023/02/jennifer-abel-named-partner-jonesworks-1235262051/) ("Abel was tapped in 2019 to run the Entertainment Division of the Los Angeles office, overseeing a strong growth period, and launching a social media and digital division.").

Ex. A, ¶ 18; Ex. B, ¶ 18; Abel Decl., ¶ 7; Abel Decl., Ex. 2, ¶ 10). Abel further agreed during the term of her employment that she would work exclusively for Jonesworks, providing no services to any other entity in the public relations industry, media communications, marketing, branding or talent management business, or any other business without Jonesworks prior written approval. (56.1 ¶ 13; Abel Decl., Ex. 2, ¶ 9; Fritz Decl., Ex. A, ¶ 18; Ex. B, ¶ 18).

Approximately sixteen (16) months later, on or about November 22, 2021, Jonesworks and Abel entered into a modified employment agreement ("2021 Employment Agreement"). (56.1 ¶ 15; Fritz Decl., Ex. A, ¶ 20; Ex. B, ¶ 20; Abel Decl., ¶ 8; Abel Decl., Ex. 3). Per the terms of the 2021 Employment Agreement, Abel agreed to serve as Vice President of Talent. Abel's employment required that she devote all her business time to Jonesworks. (56.1 ¶¶ 16-17; Abel Decl., Ex. 3, ¶ 2; *see also* Abel Decl., ¶ 10).

The Wayfarer Clients Retain Jonesworks

In or around 2018, a couple of years before Jonesworks hired Abel, Baldoni retained Jonesworks to provide him with public relations services. (56.1 ¶ 18; Abel Decl., ¶¶ 5, 14; Fritz Decl., Ex. C at 69:9 – 70:6). Thereafter, Wayfarer, a production studio founded by Baldoni and others, retained Jonesworks for public relations services. (56.1 ¶¶ 19-20; Friz Decl., Ex. C at 69:14-70:6; Abel Decl., ¶ 12; Abel Decl., Ex. 4).

On or about May 6, 2020, Wayfarer entered into an agreement with Jonesworks ("Wayfarer Agreement") for Jonesworks to serve "as its exclusive public relations counsel." (56.1 ¶ 21; Abel Decl., ¶ 15; Abel Decl., Ex. 4). Under the terms of the Wayfarer Agreement, Jonesworks was tasked with providing "strategic communication services" including:

- "Assist in developing, writing and updating communication materials related to all press outreach such as biographies, media kits, boilerplates, press releases, and key messaging";

- "Advise on any marketing and campaign strategies to ensure brand messaging is consistent, opportunities maximized, and the strongest press angles aligned";
- "Conduct media monitoring and competitor tracking for industry press"; and
- "Conduct regular check-on calls surrounding the status of Wayfarer Studios projects, events and news".

(56.1 ¶ 23; Abel Decl., Ex. 4, Schedule A; Abel Decl., ¶ 16). At her deposition, Jones (in her capacity as Jonesworks CEO) testified that Jonesworks would do "whatever [Baldoni] needed us to do." (56.1 ¶¶ 29-31; Fritz Decl., Ex. C at 82:14-22; 82:25-83:5; 84:15-18); Fritz Decl., Ex. C at 84:21-85:4). Specifically, Jones also testified that:

> "I did whatever [Baldoni] asked me to do and needed done. I'm not one of those publicists that just say I'm only, you know, this. I've become very close with clients and help them with whatever their needs are, even if it's not publicity."

(56.1 ¶ 31; Fritz Decl., Ex. C at 85:9-14). In exchange for Jonesworks' personalized and bespoke services, Wayfarer and Baldoni collectively agreed to pay Jonesworks $25,000.00 per month in addition to other expenses and fees. (56.1 ¶¶ 26-27; Abel Decl., Ex. 4).

Under the terms of the Wayfarer Agreement, the initial term of the agreement would last one year. Following the one-year term, the Wayfarer Agreement would "automatically renew for additional one-year periods" unless terminated. (56.1 ¶ 24-25; Abel Decl., Ex. 4).

Following its retention, Jonesworks provided a full team around the Wayfarer Clients. (56.1 ¶ 38; Fritz Decl., Ex. C at 83:12-14). Jonesworks also set up email distribution lists [redacted] and [redacted] to help service the Wayfarer Clients. (56.1 ¶ 33; Abel Decl., ¶ 20).

Additionally, and as part of its retention, Jonesworks assigned Abel to serve as the primary point person for the Wayfarer Clients working out of Jonesworks' Los Angeles office. (56.1 ¶¶ 39-41; Fritz Decl., Ex. C at 83:12-14; 85:15-86:23; Abel Decl., ¶¶ 17-18).

Lively's Claims against Abel Stem Exclusively from Her Employment for Jonesworks

Throughout the summer of 2024, consistent with the Wayfarer Agreement and its role as "exclusive public relations counsel," Jonesworks provided a wide range of public relations services to the Wayfarer Clients, including in connection with the premiere of the Film. (56.1 ¶¶ 23, 29-32, 35-37, 44-45, 46-78; Abel Decl., ¶¶ 13, 15, 19, 31-44; Abel Decl., Ex. 4).

During that time period and, more importantly, within the scope of her employment for Jonesworks, Abel performed public relations services for the Wayfarer Clients. (56.1 ¶¶ 45-78; Abel Decl., ¶¶ 13, 19, 31-44). A number of those activities now serve as the basis of Lively's Claims (as defined herein) against Abel, as detailed below.

On July 24, 2024, Abel advised Jones that Wayfarer was seeking recommendations from Jonesworks for a crisis management professional to work along with Jonesworks in connection with potential negative publicity related to issues on the set of the Film. (56.1 ¶ 46; Abel Decl., ¶ 31; Abel Decl., Ex. 7). Jones responded by asking for Abel's recommendations for a crisis management professional. (56.1 ¶ 47; *Id.*). Thereafter, and based upon Abel's recommendation, Wayfarer hired The Agency Group PR LLC ("TAG") to assist Jonesworks with crisis management. (56.1 ¶ 48; Abel Decl., ¶ 32; Abel Decl., Ex. 8).

On July 31, 2024, Abel texted Jamey Heath ("Heath") and Mitz Toskovic of Wayfarer about a conversation that she had with an independent journalist concerning the exclusion of Baldoni from Film-related promotions, and that such journalist was willing to publish a story of Lively's misconduct. (56.1 ¶ 49; Abel Decl., ¶ 33; *see also* Abel Decl., Ex. 9). Abel never followed up on the matter or referred the journalist to anyone else, and the story was never published. (56.1 ¶¶ 51-52; Abel Decl., ¶ 33).

On August 2, 2024, a representative of TAG sent Abel a "Scenario Planning" document referencing an objective to "[p]rotect the reputation of" the Wayfarer Clients "in the lead up, during, and following the premiere" of the Film and related goals. (56.1 ¶ 53; Abel Decl., ¶ 34; Abel Decl., Ex. 10). The "Scenario Planning" document was shared with Abel because she was a Jonesworks employee responsible for providing public relations services to the Wayfarer Clients. (56.1 ¶ 54; Abel Decl., ¶ 34; Abel Decl., Ex. 4, Schedule A).

On August 5, 2024, Abel notified Baldoni that Sony (the co-producer of the Film) had an issue with the word "friction" being used in his press interviews about the on-set relationship between Baldoni and Lively. (56.1 ¶¶ 55-57; Abel Decl., ¶ 35; Abel Decl., Ex. 11). Abel proposed the word "challenge" as a compromise to downplay the social media speculation of an "on-set feud" and to highlight that, as director of the Film, Baldoni successfully brought all people together to "create something beautiful" in the Film. (*Id*.).

On August 7, 2024, Abel exchanged certain text messages with Jonesworks' employee Matthew Mitchell ("Mitchell") and TAG employees Melissa Nathan ("Nathan"), Katie Case ("Case"), and Breanna Koslow ("Koslow") about an online narrative concerning Baldoni and Lively's separate promotion of the Film (as opposed to both being present). (56.1 ¶¶ 58; Abel Decl., ¶ 36; Abel Decl., Ex. 12; Abel Decl., Ex. 4, Schedule A).

On August 7, 2024, Case sent Heath and Abel (at her Jonesworks email address) an email referring to "social and digital mitigation and remediation" and public narratives concerning Baldoni and Wayfarer. (56.1 ¶ 60; Abel Decl., ¶ 37; Abel Decl., Ex. 13). The email was sent to Abel because she was a Jonesworks employee providing public relations services to the Wayfarer Clients. (56.1 ¶ 61; Abel Decl., ¶ 37).

On August 8, 2024, Abel sent a text message to her Jonesworks co-employee (Mitchell) and TAG employees Nathan and Case concerning negative social media posts about Baldoni by a content creator named Jenna Redfield. (56.1 ¶ 62; Abel Decl., ¶ 38; Abel Decl., Ex. 14). Taking note of (or "flagging") negative public commentary about Baldoni was a key part of Abel's duties as a Jonesworks employee performing public relations services for its clients. (56.1 ¶ 63; Abel Decl., ¶ 38; Abel Decl., Ex. 4, Schedule A).

On August 9, 2024, Abel exchanged text messages with Nathan concerning articles about a "rift" or "feud" between Baldoni and Lively, as well as other potential media coverage of the situation. (56.1 ¶¶ 64-66; Abel Decl., ¶ 39; Abel Decl., Ex. 15; Abel Decl., Ex. 4, Schedule A).

On August 10, 2024, Abel exchanged text messages with Heath, Mitchell, Nathan and Case concerning a *Hollywood Reporter* article and TikTok videos related to Lively and/or Baldoni. (56.1 ¶ 67-69; Abel Decl., ¶ 40; Abel Decl., Ex. 16; Abel Decl., Ex. 6). The TikTok video from May 17, 2023, included within the text chain, shows Baldoni and Lively in a pleasant atmosphere on the set of the Film. (*Id.*). The *Hollywood Reporter* article discusses why it was important for Baldoni to make a movie about domestic violence. (*Id.*).

On August 11, 2024, and in her capacity as a Jonesworks employee, Abel advised Wayfarer via text message about whether the timing was appropriate for Baldoni to issue further comments about domestic violence. (56.1 ¶ 71; Abel Decl., ¶ 41; Abel Decl., Ex. 17).

On August 13, 2024, Abel exchanged text messages with Heath, Baldoni, Mitchell, Case, Koslow, and Nathan concerning a TikTok video praising Baldoni and another video criticizing Lively for her marketing of the Film in a manner insensitive to domestic violence victims. (56.1 ¶¶ 72-73; Abel Decl., ¶ 42; Abel Decl., Ex. 18; Abel Decl., Ex. 4, Schedule A).

On August 15, 2024, Abel exchanged text messages with Heath, Baldoni, Mitchell, Case, Koslow and Nathan concerning the positive public comments made by Brandon Sklenar (an actor in the Film) about Baldoni and concerning other publicity related to the Film. (56.1 ¶¶ 74-75; Abel Decl., ¶ 43; Abel Decl., Ex. 19; Abel Decl., Ex. 4, Schedule A).

On August 18, 2024, Abel exchanged text messages with Heath, Baldoni, Mitchell, Nathan and Koslow concerning TikTok videos related to the Film. (56.1 ¶ 76; Abel Decl., ¶ 44; *see also* Abel Decl., Ex. 20). The TikTok video from August 17, 2024, called the Film "one of the best movies ever made" and said the Film touched on domestic violence "in the best way possible." (56.1 ¶ 77; *Id.*; Abel Decl., Ex. 6).

Jonesworks profited from the foregoing work performed by Abel, receiving its monthly $25,000 fee from the Wayfarer Clients. (56.1 ¶ 27; Abel Decl., ¶ 25; Abel Decl., Ex. 5; Fritz Decl., Ex. C at 86:24-87:2).

Abel's employment with Jonesworks ended on August 21, 2024. (56.1 ¶ 79; Abel Decl., ¶ 23). Abel never published, planted, or pitched any negative content about Lively nor "boosted" or "amplified" any negative content about Lively. (56.1 ¶¶ 83-84; Abel Decl., ¶¶ 45-46).

Lively's Lawsuit Against Abel

On July 30, 2025, Lively filed her Second Amended Complaint in which she asserted claims against Abel for: (a) aiding and abetting harassment and retaliation in violation of California's Fair Employment and Housing Act ("FEHA"); (b) false light invasion of privacy; and (c) civil conspiracy (collectively, "Lively's Claims"). (56.1 ¶ 80; Abel Decl., ¶ 26; Dkt. 520). According to the Second Amended Complaint, Nathan, her company TAG, and Abel allegedly "perpetrated a retaliation scheme against Ms. Lively" including via "the amplifying of negative content about Ms. Lively…." (56.1 ¶ 81; Abel Decl., ¶ 27; Dkt 520, ¶ 230). The

pleading further alleges that Nathan, TAG and Abel "aided and abetted the discriminatory conduct of Defendants It Ends With Us Movie LLC, Wayfarer, Baldoni and Heath, including but not limited to by participating in the above-described coordinated 'astroturfing' campaign to discredit and 'bury' Ms. Lively." (56.1 ¶ 85; Abel Decl., ¶ 27; Dkt. 520, ¶ 411). Abel denies Lively's allegations and claims. (56.1 ¶¶ 82-86; Abel Decl., ¶¶27, 45, 46; Fritz Decl., Ex. A, ¶¶ 230, 411; Dkt. 520, ¶ 411).

In her Third Amended Responses and Objections to Abel's Second Set of Interrogatories (the "Interrogatory Responses"), Lively purports to identify the "negative content about [her] (including through the engagement of social media)" that she alleges was "amplified" by Abel. (56.1 ¶ 87; Abel Decl., ¶ 28; Abel Decl., Ex. 6). In her Interrogatory Responses, Lively further alleges that Abel: (a) "amplified" negative content about her "by virtue of recommending services to be performed by TAG and facilitating that engagement"; and (b) "by direct communications with TAG and/or digital teams identifying relevant narratives as well as content to be amplified, boosted, or similar conduct, in order to negatively affect the online conversation regarding [her]." (56.1 ¶ 88; Abel Decl., ¶ 29; Abel Decl., Ex. 6). Abel again denies Lively's assertions in her Interrogatory Responses. (56.1 ¶¶ 82-86; Abel Decl., ¶¶ 27, 45, 46; Fritz Decl., Ex. A, ¶¶ 230, 411; Dkt. 520, ¶ 411). Moreover, each of the specific instances identified in Lively's Interrogatory Responses consists of public relation activities performed as part of Abel's employment with Jonesworks. As discussed above in detail, the activities performed by Abel from July 2024 through August 2024 were within the scope of her employment with Jonesworks. (56.1 ¶ 90; Abel Decl. ¶¶ 31-44; Abel Decl. Ex. 4). This makes Jonesworks responsible for any potential vicarious liability to Abel for work performed during the course of her employment with Joneswoks. (56.1 ¶¶ 90-112; Abel Decl., ¶¶ 30, 49-57; Abel Decl. Ex. Nos. 22-29).

LEGAL STANDARD

Summary judgment is appropriate where the movant shows "that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." *Fincher v. Depository Trust & Clearing Corp.*, 604 F.3d 712, 720 (2d Cir. 2010) (*quoting* Fed. R. Civ. P. 56(a)); *see also Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986).

In response the non-moving party must then set out "specific facts showing a genuine issue of material fact for trial." *See* Fed. R. Civ. P. 56(c)(1); *Wright v. Goord*, 554 F.3d 255, 266 (2d Cir. 2009). A genuine issue of material fact exists only when there is sufficient evidence favoring the non-moving party such that a reasonable jury could return a verdict in his favor. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 249 (1986). Only disputes over "facts that might affect the outcome of the suit under the governing law" will preclude a grant of summary judgment. *Id*. at 248. The non-movant must do "more than simply show that there is some metaphysical doubt as to the material facts.... [T]he nonmoving party must come forward with specific facts showing that there is a *genuine issue for trial*." *Caldarola v. Calabrese*, 298 F.3d 156, 160 (2d Cir. 2002) (emphasis in original) (*citing Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 586-87 (1986)). The "mere existence of a scintilla of evidence" supporting the non-movant cannot survive summary judgment. *Rodriguez v. City of New York*, No. 02-CV-8203 (SAS), 2004 WL 444089, at *2 (S.D.N.Y. Mar. 10, 2004) (*citing Niagara Mohawk Power Corp. v. Jones Chem. Inc.*, 315 F.3d 171, 175 (2d Cir. 2003)).

"A party may not rely on mere speculation or conjecture as to the true nature of the facts to overcome a motion for summary judgment." *Hicks v. Baines*, 593 F.3d 159, 166 (2d Cir. 2010) (citation omitted). Equally, a party may not defeat summary judgment on inadmissible hearsay. *Vitrano v. State Farm Ins. Co.*, No. 08-CV-103 (JGK), 2009 WL 3365866, at *4 (S.D.N.Y. Oct.

19, 2009) (*citing Burlington Coat Factory Warehouse Corp. v. Esprit De Corp.*, 769 F.2d 919, 924 (2d Cir. 1985)); *Raskin v. Wyatt Co.*, 125 F.3d 55, 66 (2d Cir. 1997) ("[O]nly admissible evidence need be considered by the trial court in ruling on a motion for summary judgment."); *Abdel-Karim v. Egyptair Airlines*, 116 F. Supp. 3d 389, 409 (S.D.N.Y. 2015), *aff'd sub nom. Abdel-Karim v. Egyptair Holding Co.*, 649 F. App'x 5 (2d Cir. 2016) ("A party 'cannot rely on inadmissible hearsay in opposing a motion for summary judgment ... .'") (*quoting Burlington Coat Factory Warehouse Corp.*, 769 F.2d at 924). Summary judgment is the time "to put up or shut up." *Weinstock v. Columbia Univ.*, 224 F.3d 33, 41 (2d Cir. 2000) (citation omitted).

ARGUMENT

I. ABEL IS ENTITLED TO CONDITIONAL SUMMARY JUDGMENT

Jonesworks cannot escape its obligation to indemnify its employee (Abel) for the work she performed during the course of her employment. These circumstances warrant the issuance of conditional summary judgment in favor of Abel, even though the Court has not issued a judgment in the underlying action.

The Declaratory Judgment Act provides that "[i]n a case of actual controversy within its jurisdiction, ... any court of the United States may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought." (28 U.S.C. § 2201(a)). The Act "confers a discretion on the courts rather than an absolute right upon the litigant.'" *Wilton v. Seven Falls Co.*, 515 U.S. 277, 287 (1995). This Court has issued declaratory relief where "no losses have yet accrued" because clarifying whether a party had a duty to indemnify another party was "beneficial not only to [those] parties … but to … plaintiff in the underlying action, [who] will benefit from knowing who exactly is financially liable if she prevails." *Mt. Hawley Ins. Co. v. Buckeye Real Estate Invest. LLC*, No.

23-cv-2342, 2024 WL 32334, at *5 (S.D.N.Y. Jan. 29, 2024), *vacated on other grounds*, 2024 WL 3523051 (S.D.N.Y. July 23, 2024).

It is well-established that an indemnified party can obtain conditional summary judgment on an indemnification claim as to liability even before a judgment on or settlement of the underlying claim. *See, e.g.*, *Wallace v. Nat'l R.R. Passenger Corp.*, 5 F. Supp. 3d 452, 479 (S.D.N.Y. 2014) (rejecting argument that indemnification claim was not ripe until judgment of liability on underlying claims because "a court may grant conditional summary judgment on a third-party plaintiff's indemnification claims where no genuine issues of material fact exist to preclude such judgment."); *see also McCabe v. Queensboro Farm Prods., Inc.*, 22 N.Y.2d 204, 208–09 (1968) (finding it serves the interest of justice and judicial economy in affording the indemnitee "the earliest possible determination as to the extent to which he may expect to be reimbursed"); *Hong-Bao Ren v. Gioia St. Marks, LLC*, 163 A.D.3d 494, 496–97 (1st Dep't 2018) ("[C]onditional summary judgment is appropriate here even when judgment has yet to be rendered or paid in the main action, since it serves the interest of justice and judicial economy in affording the indemnitee the earliest possible determination as to the extent to which he may expect to be reimbursed.") (internal quotations omitted).

As discussed above, Lively's Claims rest entirely on Abel's actions undertaken during the course of her employment for Jonesworks, thereby entitling Abel to common law indemnification from her employer, Jonesworks. Rather than holding Abel's claims in limbo, the Court should grant Abel conditional summary judgment on her Second Cause of Action for common law indemnification. *Lowe v. Dollar Tree Stores, Inc.*, 40 A.D.3d 264, 264 (1st Dep't 2007) (granting conditional summary judgment on third-party claim for common-law indemnification); *Clark v. 345 E. 52nd St. Owners, Inc.*, 245 A.D.2d 410, 412 (2d Dep't 1997)

(finding the trial court erred denying cross-motion for common-law indemnification). Alternatively, in the event the Court deems this motion premature because no liability determination has been made as to Lively's Claims against Abel, *see Varga v. Flowcon, Inc.*, No. 22-cv-7477, 2025 WL 2774261, *24 (S.D.N.Y. Sept. 29, 2025), Abel respectfully requests that the Court holds this motion in abeyance until such time.

II. NEW YORK COMMON LAW REQUIRES JONESWORKS TO INDEMNIFY ABEL

In her Second Cause of Action, Abel seeks indemnification under common law. (Dkt. 669, ¶ 52 – 61).

A federal court sitting in diversity must apply the choice of law rules of the state in which it sits. *IBM v. Liberty Mut. Ins. Co.*, 363 F.3d 137, 143 (2d Cir. 2004). Accordingly, courts in this district apply New York choice of law rules. *See, e.g.*, *Lively v. Wayfarer Studios LLC*, 24-cv-10049 (LJL), 2025 WL 2884407, *5 (S.D.N.Y. Oct. 9, 2025). Jonesworks contends that New York law applies to Abel's common law indemnification claim. (Dkt. No. 277 at 5–10). For purposes of this motion and reserving all rights with respect to her other claims, Abel agrees. "[W]here the parties agree that [New York] law controls, this is sufficient to establish choice of law." *Ins. Co. of the State of Penn. v. Equitas Ins. Ltd.*, 68 F.4th 774, 779 n.2 (2d Cir. 2023).

"Common law or implied indemnification is a 'quasi-contract' doctrine rooted in principles of equity and fairness conceptually related to restitution." *CSC Sci. Co. v. Manorcare Health Servs., Inc.*, 867 F. Supp. 2d 368, 377 (S.D.N.Y. 2011). Implied or common law indemnification recognizes that "a person who, in whole or in part, has discharged a duty which is owed by him but which as between himself and another should have been discharged by the other, is entitled to indemnity." *McDermott v. City of New York*, 50 N.Y.2d 211, 216 (1980) (*quoting* Restatement (First) of Restitution § 76 (1937)). "[T]he predicate of common law

indemnity is vicarious liability without actual fault on the part of the proposed indemnitee," and "a party who has itself actually participated to some degree in the wrongdoing cannot receive the benefit of the doctrine." *Trs. of Columbia Univ. in City of N.Y. v. Mitchell/Giurgola Assocs.*, 109 A.D.2d 449, 451 (1st Dep't 1985). Common law indemnity "will generally be available 'in favor of one who is held responsible solely by operation of law because of his relation to the actual wrongdoer.'" *Matzinger v. MAC II, LLC*, 17-cv-4813 (DLC), 2018 WL 3350328, at *2 (S.D.N.Y. July 9, 2018) (*quoting McCarthy v. Turner Const., Inc.*, 953 N.E.2d 794, 799 (N.Y. 2011)). Thus, if an employee is held liable for following the instructions of an employer who is vicariously responsible for those actions, and whose instructions the employee was required to follow, that employee is entitled to indemnification from the person who gave the instruction. *Rogers v. Dorchester Assocs.*, 32 N.Y.2d 553 n.2 (1973). Under the doctrine of *respondeat superior* in New York, "an employer may be vicariously liable for the tortious acts of its employees only if those acts were committed in furtherance of the employer's business and within the scope of employment." *N.X. v. Cabrini Med. Ctr.*, 97 N.Y.2d 247, 251 (2002). Abel's conduct falls squarely within the scope of this doctrine, supporting her Second Cause of Action for common law indemnification against Jonesworks.

As detailed above, the alleged conduct that forms the basis of Lively's Claims against Abel consists of public relations activities on behalf of the Wayfarer Clients during the time in which they were Jonesworks' clients, all within the scope of Abel's employment, and any such conduct was undertaken at Jonesworks' direction. In sum, the record firmly establishes: (a) Wayfarer and Baldoni retained Jonesworks to perform public relations services for them (56.1 ¶¶ 18-27; Abel Decl., ¶¶ 4, 5, 12, 14, 15, 16, 20; Abel Decl., Ex. 4, Schedule A); (b) Jonesworks employed Abel to render those services (56.1 ¶¶ 9-17, 46-79; Fritz Decl., Ex. A, ¶¶ 16-18, 20;

Ex. B, ¶¶ 16-18, 20; Abel Decl., ¶¶ 4, 5, 6, 7, 8, 10, 11; Abel Decl., Ex. Nos. 1, 2, 3);[3] and (c) Jonesworks knew of and directed Abel's public relations activities for Wayfarer and Baldoni, including garnering positive publicity and eliminating or minimizing negative publicity for them. (56.1 ¶¶46-79, 90-112; Abel Decl., ¶¶ 47-57; Abel Decl. Ex. Nos. 4, 21-29).

Jonesworks provided the Wayfarer Clients with a wide range of services, including but not limited to crisis management to public relations. (56.1 ¶¶ 21-23; Abel Decl., ¶¶ 15, 16; Abel Decl., Ex. 4, Schedule A; Fritz Decl., Ex. C at 83:6-14; 87:12-16). As Jones testified both she and her firm did "whatever [Baldoni] needed us to do." (56.1 ¶ 30-31; Fritz Decl., Ex. C at 82:14-22; 82:25-83:5; 84:15-18; 84:21-85:4; 85:9-14). This necessarily included providing advice, counsel, and public relations support surrounding the premiere of the Film. Furthermore, as discussed above, each of the purported acts which form the basis of Lively's Claims against Abel consist of public relations activities not only within the scope of Abel's employment for Jonesworks, but were also part and parcel of Jonesworks' obligations to the Wayfarer Clients. In other words, Jonesworks lacks any legitimate, much less cogent, basis upon which to deny responsibility for Abel's activities.

Jones herself knew of Abel's actions, providing supervision and direction. (56.1 ¶ 92; Abel Decl., ¶ 49). The record further establishes: (a) Jones knew Abel was working with Baldoni on his press tour (56.1 ¶ 94; Abel Decl., ¶ 50; Abel Decl., Ex. 21); (b) Jones knew Jonesworks employees (such as Abel) monitored social media activity concerning Baldoni and the Film (a standard practice) (56.1 ¶¶ 104-106; Abel Decl., ¶¶ 51, 55; Abel Decl., Ex. Nos. 23, 27); (c) Jones knew Abel and other Jonesworks employees interacted with the press handling inquiries

[3] The Court already concluded an employment relationship exists between Jonesworks and Abel. *See Lively*, 2025 WL 2884407, at *7 (finding an employment relationship "established by contract").

and other public relations issues (56.1 ¶¶ 96-103; Abel Decl., ¶¶ 52, 53, 54; Abel Decl., Ex. Nos. 22, 24, 25, 26); and (d) Jones knew Wayfarer had retained TAG to provide crisis management advice and services. (56.1 ¶ 112; Abel Decl., ¶ 57; Abel Decl., Ex. 29; Fritz Decl., Ex. C at 88:3-89:3). Jones herself even provided the Wayfarer Clients with a strategy to handle publicity. (56.1 ¶¶ 109-111; Abel Decl., ¶ 56; Abel Decl., Ex. 28). In fact, even after Abel's employment ended, Jonesworks continued to represent both Wayfarer and Baldoni until at least August 30, 2024. (56.1 ¶ 113; Abel Decl., ¶ 57; Abel Decl., Ex. 29; Fritz Decl., Ex. C at 76:20-77:7; 88:3-89:3).

Jonesworks has not only declined to defend Abel but has denied any obligation to do so, going so far as to move to dismiss her claim. *See Lively*, 2025 WL 2884407 (decision on Jonesworks' motion to dismiss). Jonesworks further separately sued Abel based upon (false) allegations that Abel's public relations work "went far beyond the legitimate scope of Abel's employment." (*Jones et al. v. Abel et al.*, S.D.N.Y. Case No. 25-cv-779, Dkt. 1, ¶ 4).

Therefore, Abel is entitled to common law indemnification from Jonesworks in connection with Plaintiff's Claims.

CONCLUSION

For these reasons, the Court should grant Jennifer Abel conditional summary judgment against Jonesworks on the Second Cause of Action in her Amended Third-Party Complaint.

Dated: November 11, 2025

/s/ Kevin Fritz

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