

# EXHIBIT H

[Log In](#) | [Magazine](#) | [Newsletters](#) | [Sweepstakes](#)[ENTERTAINMENT](#)[CRIME](#)[HUMAN INTEREST](#)[LIFESTYLE](#)[ROYALS](#)[STYLEWATCH](#)[SHOPPING](#)[SUBSCRIBE](#)

## Justin Baldoni Files Response to Blake Lively's Motion to Dismiss His Countersuit: 'We Will Continue to Fight,' Lawyer Says

Lively's attorneys filed a motion to dismiss Baldoni's defamation lawsuit last month

By [Charmaine Patterson](#) | Updated on April 4, 2025 10:49AM EDT

[10 COMMENTS](#)



Blake Lively, Justin Baldoni.  
Credit : Gotham/WireImage (2)

[Justin Baldoni](#) has filed a response to [Blake Lively](#)'s motion to dismiss his \$400 million lawsuit against her.

[Baldoni sued Lively for defamation](#) and other claims on Jan. 16, about a month after [Lively filed a lawsuit](#) that accused Baldoni of sexual harassment and orchestrating a retaliatory smear campaign over their [behind-the-scenes fallout](#) while filming [It Ends with Us](#). The movie, which was released in theaters on Aug. 9, 2024, starred Lively and Baldoni, who also directed. The actor's lawsuit also named Lively's husband, [Ryan Reynolds](#).

Lively's lawyers, Mike Gottlieb and Esra Hudson, [filed the motion to dismiss on March 20](#), calling Baldoni's claims "vengeful and rambling" and an abuse of the legal system. Specifically, they said the newly enacted California Civil Code Section 47.1 prohibits retaliatory lawsuits tied to public disclosures of sexual harassment.

Baldoni's attorney, Bryan Freedman, responded to the motion in the Southern District of New York on Thursday, April 3, per court documents obtained by PEOPLE.

**RELATED:** [Justin Baldoni Blasts Ryan Reynolds for Attempt to Dismiss Lawsuit, Calls Him Blake Lively's 'Co-Conspirator'](#)



**Blake Lively; Justin Baldoni.**

Credit: SUZANNE CORDEIRO/AFP via Getty; Araya Doheny/Variety via Getty

Freedman states that Lively requested to dismiss the lawsuit for "failure to state a claim." She also asked for attorneys' fees, costs, damages and punitive damages.

However, Freedman says Baldoni's complaint provides details of "Lively's calculated efforts first to extort and manipulate" Baldoni and his Wayfarer Studios production team, "into ceding total control over the film *It Ends with Us* and then to defame and scapegoat them when her plan backfired."

They add that Baldoni's complaint provides specific claims of defamation against Lively that are "sufficient to defeat dismissal." Baldoni's attorney also claims that, even if a dismissal is granted, Lively is not owed attorneys' fees and damages.

The response alleges Blake's attempt to dismiss Baldoni's lawsuit is her way of asking the court "to find that she is immune from *any* culpability for her wrongful acts."

Addressing California Civil Code Section 47.1, Freedman says enforcing it would require the court to determine "that she acted alone and without malice and that she had a reasonable basis for her claims."

**RELATED:** ['Blake Lively Has the Stronger Case.' Lawyer Explains Potential Flaw in Justin Baldoni's Arguments](#)



Justin Baldoni on Aug. 6, 2024.  
Credit: John Nacion/Variety via Getty

"Ms. Lively and her circle of Hollywood elites cannot prevent my clients from exercising their constitutional right to petition the court to clear their names from her false and harmful claims," Baldoni's attorney Bryan Freedman tells PEOPLE in a statement on Thursday.

He added of Lively's motion to dismiss: "What Ms. Lively is attempting to do is to set a dangerous precedent by barring the courthouse doors to my clients and punishing them for having their day in court, a right protected by the First Amendment."

**Never miss a story — sign up for [PEOPLE's free daily newsletter](#) to stay up-to-date on the best of what PEOPLE has to offer, from celebrity news to compelling human interest stories.**

"This right protects not only Mr. Baldoni and the Wayfarer parties in this particular case, but all Americans in the future who have false accusations levied against them and seek relief from our justice system," Freedman continues. "This must stop here, and we will continue to fight against this blatant attempt to block access to the court system and to weaken our nation's Constitution to serve those who are in the position of power."

Reacting to the filing, Lively's attorneys Gottlieb and Hudson claim in an April 4 statement that Baldoni and the Wayfarer parties "are now arguing that nobody should be protected by the sexual harassment privilege. They're not just saying that it doesn't apply to Ms. Lively — they're saying it's unconstitutional and no woman should ever have these protections."

"That's right," they add, "Justin Baldoni, the man who has built his brand on supposedly speaking up for victims, believes that the First Amendment rights of victims of sexual assault and harassment to speak out should give way to the rights of perpetrators to sue their victims 'into oblivion.' These defendants are so hell bent on trying to destroy Blake Lively that they are willing to shred a law designed to protect all victims just to make sure they 'bury' one."

LEAVE A COMMENT 