Exhibit H

From: Jason Sunshine <jsunshine@lftcllp.com>
Sent: Monday, November 10, 2025 4:11 PM
To: Licette Lozano; Calendar LA; Rosemary Lopez
Cc: Morgan Anastasio; Chip Babcock; Joel Glover; Hudson, Esra; Bruno, Matthew; Gottlieb, Michael; Bender, Kristin; Nathan, Aaron E.; Meryl Governski; Connolly, Michaela; Taustine, Melissa; Kristin Tahler; Maaren Shah; Nicholas Inns; Bryan Freedman; mitra@ahouraianlaw.com; Local KAF. Counsel; Local MS. Counsel; Summer Benson; Theresa Troupson; Vaneta Birtha; Alexandra Shapiro; Jonathan Bach; Alice Buttrick; Rose Khatchikian
Subject: Justin Baldoni Confidentiality Designations [Lively v. Wayfarer et al., No. 24-cv-10049 / Jones v. Abel et al., No. 1:25-cv-00779-LJL]
Attachments: Justin Baldoni 10-06-2025 Confidentiality Designations.pdf; Justin Baldoni 10-07-2025 Confidentiality Designations.pdf

***** EXTERNAL EMAIL *****

All,

Please see the attached deposition transcripts of Justin Baldoni with confidentiality designations pursuant to the Protective Order:

- The highlighted portions of the transcripts are designated as confidential.
- The rest of the testimony is hereby de-designated.
- There shall be no change to the pre-existing designations of documents marked as exhibits.

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Thanks,
Jason

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Liner Freedman Taitelman+Cooley

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
---oOo---

BLAKE LIVELY,
Plaintiff,
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)
25-CV-449 (LJL) (MEMBER CASE)

WAYFARER STUDIOS LLC, ET AL.

Defendants.

JENNIFER ABEL,
Third-party Plaintiff,
vs.
JONESWORKS, LLC,
Third-party Defendant.

WAYFARER STUDIOS LLC, et al.
Consolidated Plaintiffs,
vs.
BLAKE LIVELY, et al.
Consolidated Defendants.

CONFIDENTIAL

VIDEO-RECORDED DEPOSITION OF JUSTIN BALDONI
Los Angeles, California
Monday, October 6, 2025
Stenographically Reported by: Ashley Soevyn,
CALIFORNIA CSR No. 12019

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
---0O0---

BLAKE LIVELY,
Plaintiff,
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25-CV-449 (LJL) (MEMBER CASE)

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vs.
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Third-party Defendant.

WAYFARER STUDIOS LLC, et al.
Consolidated Plaintiffs,
vs.
BLAKE LIVELY, et al.
Consolidated Defendants.

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Video-recorded Deposition of JUSTIN BALDONI, taken on behalf of the Plaintiff Jonesworks, et al., Pursuant to Notice, at the offices of Willkie Farr & Gallagher, 2029 Century Park East, Los Angeles, California beginning at 9:15 a.m. and ending at 6:46 p.m. on Monday, October 6, 2025, before me, ASHLEY SOEVYN, California Certified Shorthand Reporter No. 12019.

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Also Present:
Jennifer Abel
Melissa Nathan
Jamey Heath
Steve Sarowitz (Via Zoom)
Laura Prather, Esq. (Via Zoom)
Alice Butrrick, Esq. (Via Zoom)
Zach Czerenda, Veritext Legal Solutions Concierge (Via Zoom)
Jonathan Hernandez, Videographer

INDEX TO EXAMINATION

WITNESS: JUSTIN BALDONI

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MS. SHAH 15

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Monday, October 6, 2025
Ashley Soevyn, CSR No. 12019

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CONFIDENTIAL DEPOSITION PROCEEDINGS
MONDAY, OCTOBER 6, 2025
--0O0--

THE VIDEOGRAPHER: Good morning. We're on the record. The time is 9:15 a.m. Pacific Daylight Time. Today is October 6, 2025.

My name is Jonathan Hernandez. I'm a video technician with Veritext Legal Solutions located in Los Angeles, California. We are recording these proceedings at 2029 Century Park East, Los Angeles, California.

This is the video deposition of Justin Baldoni in the action entitled Blake Lively v. Wayfarer Studios LLC, et al.

This deposition is being taken on behalf of the plaintiff. The Case No. is 24-CV-10049.

Now, would you all please identify yourselves and who you represent starting with the noticing attorney.

MS. SHAH: Maaren Shah from Quinn Emanuel Urquhart and Sullivan on behalf of Stephanie Jones and Jonesworks.

MS. BABAYAN: Laurenne Babayan from Quinn Emanuel representing Stephanie Jones and Jonesworks, LLC.

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MS. TAHLER: Kristin Tahler, Quinn Emanuel, representing Stephanie Jones and Jonesworks.
MR. GOTTLIEB: Mike Gottlieb from Willkie Farr & Gallagher on behalf of Ms. Lively.
MS. HUDSON: Esra Hudson of Manatt, Phelps & Phillips on behalf of Plaintiff Blake Lively.
MS. BENDER: Kristin Bender, Willkie Farr & Gallagher on behalf of Plaintiff Ms. Lively.
MS. CONNOLLY: Michaela Connolly from Willkie Farr & Gallagher on behalf of Ms. Lively.
MR. GLOVER: Joel Glover of Jackson Walker for Jed Wallace and Street Relations, Inc.
MR. FREEDMAN: Bryan Freedman on behalf of the deponent, Justin Baldoni, Jamey Heath, the Wayfarer parties, Jen Abel, Melissa Nathan and the related entities.
MS. BENSON: Summer Benson, Liner Freedman Taitelman & Cooley on behalf of the Wayfarer parties.
MS. AHOURAIAN: Mitra Ahouraian on behalf of the Wayfarer parties.
MR. BACH: Jonathan Bach, Shapiro Arato Bach, on behalf of all the same defendant parties.

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MS. SHAPIRO: Alexandra Shapiro, Shapiro Arato Bach, on behalf of Mr. Baldoni and the Wayfarer parties.
THE STENOGRAPHIC REPORTER: Sir, can I please have you raise your right hand.
Do you solemnly state that the testimony you're about to give in this deposition will be the truth, the whole truth, and nothing but the truth?
THE WITNESS: Yes, I do.
THE STENOGRAPHIC REPORTER: Great. Thank you.

EXAMINATION

BY MS. SHAH:

Q Good morning, Mr. Baldoni.
A Good morning.
Q We met a minute ago. My name is Maaren Shah, and as you heard, I represent Stephanie Jones and Jonesworks in these related cases.
Can you tell me, have you ever been deposed before today?
A No.
Q Have you ever testified in a court of law before today?
A No.
Q Let's run through some of the ground

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rules for depositions so that we can all be operating on the same wavelength.
Do you understand that you're under oath today, the same -- in the same effect as you would be in a court of law?
A I do.
Q And you are required today to give full, complete and truthful testimony.
Do you understand that?
A I do.
Q Is there any reason you would not be able to give full, complete and truthful testimony today?
A There is not.
Q Is there anything that would impede your ability to recall past events while you're testifying today?
A No.
Q During the course of the day, I'm going to be asking you questions. When you answer, if you could please give audible answers as you're doing now so that the court reporter can get an accurate record, that would be appreciated.
A I will do my best.
Q And we're going to try for the benefit of the court reporter to both speak slowly, and if you

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could do me the courtesy of trying to wait for my question to be finished before answering, and I will try to wait for your answers to be finished before asking another question, that gives us a cleaner record.
A Deal.
Q All right. Your attorney may be objecting today. If your attorney objects, unless she instructs you not to answer the question, you are still required to answer the question.
A Understood.
Q If you need to take a break for any reason, please let me know. This is not supposed to be an endurance test, but I would ask that you please wait if there is a question pending until you complete your answer, and then we can take a break after that.
A I drink a lot of water, so...
Q We will be taking regular breaks throughout the day. But if you ever need one and the attorneys don't call for one, just let us know.
If for any reason you don't understand any of my questions, please let me know and I'm happy to rephrase them. If you answer my question as stated without asking me to rephrase it, can we

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both assume and understand that you understood what I was asking when -- when you answered it?
A Yeah.
Q Can you tell me whether you did anything to prepare for your deposition today?
A Yes.
Q What did you do?
A I worked with my attorneys, three days or so this week.
Q Which attorneys were those?
A Alexandra, Jonathan, Mitra, Theresa, a little bit with Bryan. Yeah.
Q Other than the attorneys that were present, was there anyone else there while you were preparing for your deposition?
A No. Not while I was preparing.
Q You said three days this week. Were there any other sessions before that?
A No.
Q Approximately how long each of the --
A Wait, is today Monday?
Q Yes. Three days last week?
A Last week.
Q Okay. Approximately how long did you prepare on each of the three days last week?

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A Four hours. It might have been four days, but for four hours or so each day, not -- I mean, including, like, lunches and bathroom breaks.
Q Were these in-person or Zoom sessions?
A In person.

[redacted]

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[redacted]

MS. SHAPIRO: Just yes or no.
THE WITNESS: Yes.
BY MS. SHAH:
Q Did any of those documents help refresh your recollection or memory of the events that you'd be testifying here today?
A No.
Q Okay. Are you aware of whether all the documents you reviewed in preparation for this deposition were produced in this case?
A I would assume so.
Q Okay. Did you go back through your phone in preparation for this deposition and review anything on your phone?
A No.
Q You've attended, either by Zoom or in person, some of the other depositions that have taken place in this case; is that right?

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A A few, yes.
Q Can you list them for me, please?
A I will try. In person was Ms. Lively. On Zoom, never full depositions, but in part, Jennifer Abel, Melissa Nathan, Stephanie Jones, Jenny Slate. I listened to a little bit of Isabella Ferrara, Ange Giannetti, Alex Saks, Josh Greenstein, and a little Colleen Hoover. And I may be forgetting someone.
Q How about Katie Case?
A A little bit of Katie Case. Thank you.
Q How about Breanna Butler Koslow?
A No. I don't -- I don't believe so.
Q Have you read -- apart from attending or listening into some of the depositions in this case, have you read the transcripts of any of the depositions in this case?
A I have not.
Q Have you read the transcript of Katie Case's deposition?
A I have not.
Q Prior to this deposition, apart from speaking with your attorneys, did you speak with anyone else about the subject of your deposition?
A No.

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Q You didn't speak to Jamey Heath about it?
A About the subject of my deposition?
Q Or the fact that you would be having a deposition --
A Oh, yes. Sorry. I misunderstood the question. I thought you meant, like, the content of my deposition.
Q No problem. Anyone else?
A That I would be deposed?
Q Sure.
A Jennifer Abel, my family, my wife. We had a prayer gathering last night with a lot of friends so they were aware that I was being deposed, but that's all I can think of at the moment, yeah.
Q Did you speak to Melissa Nathan about your deposition at all?
A I have not.
Q Did you speak to Steve Sarowitz about your deposition at all?
A I did speak to Steve Sarowitz. We were together here at his deposition.
Q When you spoke to Steve Sarowitz about your deposition, was there an attorney present?
A Yeah. Yes.
Q When you spoke to Jen Abel about your

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deposition, was there an attorney present?
A No, that was over the phone.
Q What did you discuss with Jen Abel about your deposition?
A It wasn't a conversation about the deposition. It was like, "you're going to do great." And she was letting me know she was going to be there. But there was no content that was discussed.
Q Anything else?
A She might have said just to keep being honest and shine your light or something to that extent.
Q And when you spoke to Jamey Heath about your deposition, was there an attorney present?
A Jamey and I speak all the time, so it may have come up at one point when it was just us or our families together, but I -- I don't know.
Q Can you recall anything about your conversations with Jamey Heath about your deposition at any point in time when there were not attorneys present?
A Most of the relationship with me and Jamey is bolstering each other and just reminding, like, he -- like a brother reminds me who I am. I

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can't think of any other details. It's more like positive encouragement. These are -- these are pretty intense things, so kind of like a friend or a coach or you got this.
Q Have you spoken to Jamey about his deposition?
A No, it's been -- I'm first, so it's been focused on mine.
Q How would you characterize your relationship with Jamey Heath?
A He's one of my best, closest friends.
Q How long has he been one of your best, closest friends?
A I've been married -- I would say 15, 14 years. Maybe 14 years.
Q Were you friends before you began working together, or did you work together before you became friends?
A We were friends before we began working together.
Q How would you characterize your relationship with Jen Abel?
A We -- well, she was my publicist first, and then I think through -- I mean, I like to think of the people I work with as friends, so I would

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have considered her a friend. I think through this experience, we've gotten closer. But I would have considered her my publicist.
Q And how would you characterize your relationship with Melissa Nathan?
A A friendly publicist who -- you know, we don't know each other very well. I think this is the second time we met in person. But like everyone else in this case, I think that the bond of being in the situation we're in has maybe brought us closer together. But friendly.
Q Prior to the deposition, did you have any role in helping to gather your documents, emails, texts, voice notes to be produced by your attorneys as discovery in this case?
A Can you ask that again?
Q Sure.
Are you aware that some of your documents, text messages, emails, et cetera, have been given to the plaintiffs in these cases as part of the discovery process?
MS. SHAPIRO: Don't answer that to the extent it -- it calls for information provided by your attorneys to you.
THE WITNESS: Yes.

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BY MS. SHAH:
Q Did you have any role in helping to gather those materials?
A I think so.
Q What was your role?
A I had to hand over my phone multiple times to -- I don't know, I think they are called, like, data scientists. That's what I can remember right now. There were -- I think -- I think I had looked through for various emails, I don't remember the content of, to just make sure that people had everything, or texts that people had everything they needed.
Q What is your preferred method of communication?
MS. SHAPIRO: Objection.
BY MS. SHAH:
Q I don't mean in an existential sense. I mean in a practical sense. Do you like to text? Do you like to email? Do you like to call on the phone?
A It depends. Am I in a lawsuit or not in a lawsuit when I'm communicating?
Q Let's start with a lawsuit.
A Okay. Text, but I'm pretty bad at it

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these days.
Q So you do use Apple iMessage to communicate, right, text message?
A Yeah.
Q Do you use email to communicate?
A I get a lot of e-mails but I -- not good at responding to them. I do respond at times, but it's generally pretty short.
Q Do you use WhatsApp messaging to communicate?
A I'm on WhatsApp threads with various people.
Q Do you use Signal to communicate?
A Since the lawsuit, I do. Yeah.
Q Before the lawsuit?
A No.
Q Since the lawsuit, who have you used Signal to communicate with?
A Mostly my attorneys, the people that are the defendants, some friends.
Q Do you use Telegram to communicate?
A No.
Q Do you ever send voice notes?
A Yeah.
Q Do you ever record phone calls that

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you're a participant in?
A I certainly have from time to time.
Q Do you do that frequently?
A No.
Q Did you ever record any phone calls or Zooms with the participants in this case?
A In which case exactly?
Q Either the Blake Lively case or the Stephanie Jones case?
A Yes.
Q How many times would you estimate you recorded the phone calls or Zooms?
A Two to four. Maybe four times, maybe. Might be three.
Q Am I correct to understand that's four times ever that you recorded phone calls or Zooms with any of the participants or witnesses or people involved in the events that underlie either of these litigations?
A I don't do it often. So I imagine it was around four, two to four. I'd have to take a lot of pausing to really think about that which -- I think it's between two and four. Why don't we say four.
Q How about in-person meetings?
MS. SHAPIRO: Objection.

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THE WITNESS: One that I can think of.
BY MS. SHAH:
Q What is that one?
A I recorded an improv acting session between Jenny Slate and Ms. Lively.
Q That you were also a participant in?
A I was.
Q Where were you located when you recorded that?
A At our production offices in Hoboken, New Jersey.
Q Where was Ms. Slate located?
A In New Jersey.
Q She was with you?
A Yeah.
Q Where was Ms. Lively located?
A I assume she was at her house, which is in New York.
Q Other than that one in-person meeting, can you think of any other in-person meetings that you recorded that have -- that involved any of the participants in the events underlying these cases or had anything to do with the events underlying these cases?
MS. SHAPIRO: Objection.

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THE WITNESS: At the moment, I can't.
BY MS. SHAH:
Q Are you aware that your counsel produced to us last night four recordings --
MS. SHAPIRO: Objection to the extent it calls for information provided by your attorneys.
BY MS. SHAH:
Q -- that appear to be recordings by you or phone calls or in-person meetings having to do with this case?
MS. SHAPIRO: Same objection.
THE WITNESS: I would imagine that they would.
BY MS. SHAH:
Q Are you aware that they were produced last night?
MS. SHAPIRO: Objection. Directing you not to answer anything to the extent it calls for information you only know from your attorneys.
THE WITNESS: I can't answer.
BY MS. SHAH:
Q Are you going to follow your counsel's instruction?
A Yes, ma'am.

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Q Do you recall recording a phone call between you and any of the following: Ange Giannetti, Josh Greenstein or Todd Black?
A Ange Giannetti. I don't know if Todd Black was on it, but I know Ange. Yeah.
Q Tell me what you recall about that phone call with Ange.
A I haven't listened to them. What I recall is feeling, almost feeling like -- feeling scared and almost feeling like what was happening was, like, I needed a witness. Because what was happening was just kind of -- it felt kind of crazy. But I don't remember the content of the call. I assume it had to do with figuring out how to get through a difficult shoot.
Q What was it at the time that felt kind of crazy to you?
A I don't know exactly what call or when it was recorded so I don't know if I can answer that without more details.
Q Do you remember why you recorded that call?
A Again, I just need to know what call you're referring to.
Q Do you have a memory of a call that you

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recorded with Ange Giannetti?
A I have a vague memory. Yes.
Q With respect to that call that you have a vague memory of, do you have any recollection of why you recorded that call?
A I think I felt powerless and scared and kind of lonely, I think.
Q What did you intend to do with that recording?
A Nothing. I just -- I didn't know if I would ever need it one day.
Q Have you needed it?
A I haven't looked at it or listened to it. So apparently not.
Q Did you tell her that you were recording the call?
A I didn't.
Q Where were you located when you recorded the call?
A I don't know. I would have to know the date on the recording, and then I could try to reverse engineer it.
Q From your vague memory of doing this, give me your best estimate of where you were located.

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A I honestly have -- I don't know.
Q Is it possible that you were in California?
MS. SHAPIRO: Objection.
THE WITNESS: It's absolutely possible.
BY MS. SHAH:
Q Where was Ange located when you recorded that call?
A I assume she was in California.
Q Do you have a memory of recording any calls with Josh Greenstein?
A No.
Q Do you have a memory of recording any calls with Todd Black?
A Only if Todd were on a call with Ange.
Q Where is Todd Black located?
MS. SHAPIRO: Objection.
THE WITNESS: Like right now?
BY MS. SHAH:
Q No. In general. Where does he live and work?
A He's often in New York. I believe he lives in LA, but he's often shooting movies.
Q Does he maintain an office in LA?
A I don't know.

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Q Do you recall ever recording a call with Stephanie Jones?
A No.
Q Do you recall ever recording a call with Jen Abel?
A I don't.
Q Do you recall ever recording a call with Melissa Nathan?
A No.
Q Other than the one improv session where Jenny Slate and Blake Lively were present that we spoke about, do you recall ever recording a call with Blake Lively?
A No.
Q Do you recall ever recording a call with Tim Miller?
A I don't know who that is.
Q Okay. Other than the one call that we've spoken about that you recorded with Ange Giannetti, you said you might have recorded two to four calls relevant to these litigations.
Do you remember any others?
A Yes.
Q Meaning -- okay. Sorry. Please tell me about them.

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A Is it -- do you want to finish your question?
Q No. It's all right.
A I didn't mean to interrupt you.
Q I know. It's all right. I was trying to ask a better question but I think I --
A Do you mind re-asking the question?
Q Other than the one call we've spoken about with Ange Giannetti, do you recall recording any other calls?
A Yes.
Q Okay. Please tell me about those.
A I recorded a -- part of a call with Shawn Levy.
Q Who is Shawn Levy?
A Shawn Levy is a director and a -- apparently a very close friend of Ms. Lively and Mr. Reynolds.
Q What do you recall about that call?
A I recall he wanted to speak to me. And as we began talking, I got the feeling that he was calling to kind of adjust or course correct, which made me feel a little uncomfortable.
Q Adjust or course correct from what?
A I didn't know.

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Q What do you mean when you say "adjust or course correct"? Just explain that to me a little bit more, please.
A It felt like he was being asked to call me. Like he wasn't just calling to talk or check in.
Q And what was he calling you about?
A The movie, It Ends with Us, and Ms. Lively.
Q Was he calling you about the tensions that were arising in relation to that movie?
A No.
Q So what about the movie, It Ends with Us, was he calling you about?
A He was calling to give me advice, it appeared, on how to handle or navigate making a movie with Ms. Lively.
Q When in time was this?
A I could be wrong. I believe it was April of '23.
Q Where were you located when you recorded the call?
A At my office in New Jersey.
Q Where was he located when he was speaking to you on the call?

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A I don't know.
Q Did you inform him that you were recording the call?
A I did not.
Q Other than these two calls we've now spoken about, one with Ange Giannetti and one with Shawn Levy, can you remember any other phone calls that you recorded?
A It's not something I do often. So no, to be precise. I can't.
Q Does Jamey Heath often record phone calls to your understanding?
A I'm unaware of what Jamey does on his own time.
Q Does Jamey Heath ever record phone calls in the course of his work for Wayfarer to your understanding?
A I don't know. I know he has. But I don't know if it's a regular practice.
Q How do you know he has?
A Because I'm aware of at least a recording.
Q Which recording is that?
A I'm aware of a recording of a WME, WME agent or conversation that happened.

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Q How did you become aware of that recording?
A I believe I was -- I believe I was told.
Q By whom?
A I don't remember, but I would assume Jamey.
Q Why was he telling you that he recorded that call?
A My -- I don't -- I can't speak to why he was telling me.
Q Did you have any understanding from what he said to you of why he was telling you?
A Yes.
Q And what was that understanding?
A I believe we were being -- we were being threatened.
Q By whom?
A By Mr. Reynolds and Ms. Lively.
Q Were you on that call?
A No.
Q Do you know who was?
A I know someone from WME, I presume to be my former agent. I think Jennifer Abel was on the call.
Q Anyone else?

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A There may have been assistants on the WME side or -- I'm not sure.
Q When you say your former agent at WME, do you mean Danny Greenberg?
A I do.
Q Was your understanding of that call that it was a call between Jamey and Danny Greenberg?
A I actually don't know much about the call. So I don't -- I can't answer that.
Q To your understanding, how were you being threatened at the time by Blake Lively and Ryan Reynolds?
A My understanding was that there were demands being made that I release some sort of public statement that had been drafted by Mr. Reynolds and Ms. Lively and given to an agent. And I had been told there were multiple calls that were coming -- incoming from the agency saying that if Justin doesn't release a statement, then they will -- Ms. Lively and Mr. Reynolds -- will leave William Morris.
I was told that they called, the agency called numerous times, and this evidently was a phone call on which a statement was read that was prepared by Mr. Reynolds and Ms. Lively. And the

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only other thing I remember about it was that I was -- that it was inferred that if this wasn't done, the gloves would come off.
Q When were you told -- let's start with this. When were you told about that phone call?
A I presume hours after it happened.
Q And when were you told that that phone call had been recorded?
A I feel like early 2025, I think.
Q Have you ever listened to that recording?
A I have not.
Q Do you know where Jamey was located when he made that recording?
A I would assume in Los Angeles.
Q Do you know if he informed any of the people on the call that he was recording it?
A I don't.
Q Do you know where Danny Greenberg was located during that call?
A I don't.
Q Do you know where Jen Abel was during that call?
A I wasn't there, so I don't.
Q Can you describe for me in your own words what you do for a living?

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A I am -- that's a good question. I'm a filmmaker, an actor. I have been an author. I hosted a podcast. And I am part owner of a studio. I guess I'm an entertainment entrepreneur maybe.
Q The part owner of a studio, the studio you're referring to is Wayfarer; is that right?
A Yes, ma'am.
Q What is your percentage ownership of Wayfarer?
A Somewhere between 20 and 25 percent, I think.
Q And the remaining ownership, is that held by Steve Sarowitz?
A Yes.
Q Does anyone else have any part ownership in Wayfarer?
A There are -- I'm not sure contractually if anyone does. But there are -- I know there are two. There might be three people that have like promises of equity or ghost stock or I don't know if anything's been formalized.
Q Who are those two or three people?
A Jamey Heath, Ahmed Kolacheh, and Tera Hanks, I believe.
Q Going through each of them, do you have

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an understanding of why they've been promised ghost equity or some sort of promise of equity in Wayfarer?
A I believe so.
Q Can you tell me?
A I will start with Ahmed. Ahmed was my former partner at Wayfarer Entertainment, which was a small production company that I had started years ago, and he's an independent producer now. But I didn't feel like I could have started Wayfarer without his help with Wayfarer Entertainment so I gave him a small piece of my own equity.
Jamey Heath took a low salary compared, probably, to a lot of other folks and has lived and breathed the company. And Steve and I felt he deserved a small piece of equity.
And I'm still unsure if Tera Hanks officially has any or that any was promised. But when she joined, I think it was discussed. But I don't have a full memory of it.
Q Would you say it's accurate that you and Steve Sarowitz co-founded Wayfarer Studios?
A Yeah, I think so.
Q When did that happen?
A I believe officially, it was around the

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time of the pandemic, so early 2020. But I know it was starting to happen, like there were conversations in 2019. I just don't know the exact, like, date the papers were signed or things like that.
Q And how did that come about?
A The starting of Wayfarer Studios?
Q Uh-huh.
A I had always wanted to have the means to create movies that I thought could make a difference and help people. And Steve had a very similar world view, and he wanted to make movies that could help people too. So we started Wayfarer.
Q How did you come to know Steve Sarowitz?
A I first met Steve when he was making a film called The Gate. It was a story of the Bab, who was a central figure in the Baha'i faith. And we were introduced because he said he didn't know what he was doing and he needed some guidance. And so I helped him out and we became friends. And we have a shared faith.
Q Do you know approximately when this was that you were introduced to him?
A I don't. I feel like maybe 2016 or 2017.
Q Would you say there's a common thesis or

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mission at Wayfarer Studios behind the types of projects that you take on?
A That's something we aspire to.
Q What is it?
A To make movies that make people feel. Films that can help people heal. We can bring people together, help people recognize their shared humanity.
Q How many films has Wayfarer made?
A I'm going to fail this test. Does that include films that we didn't make that we invested in?
Q Yes. And why don't you explain to me which are which.
A Our business model is a little fluid in that we will finance and make films, and also we will join other films that are being made and then finance them, or be minority partners in films if they need, like finishing funds. I don't know. This is my answer, unfortunately.
Q Sticking with the number of films that Wayfarer has financed and made itself, can you give me a rough number or list any of them?
A Financed and made. I feel like we're in the -- again, I -- I can't be held to this because,

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like, I'm going to guess in the 15 number.
Q And then in terms of films that Wayfarer has invested in or provided finishing funds for, can you give me a rough number or name any of them?
A Garfield, Angry Birds. There are -- there are a few others that I just can't -- I apologize, I can't think of the names right now.
Q In terms of the 15 or so films that Wayfarer has financed and made itself, can you give me any names?
A Sure. Clouds -- and these also aren't just us alone. We had partners in a lot of these. Clouds, Nice Indian Boy, Code Three, The Senior, Empire Waist, Black is Beautiful, I think it's called Blackballed, Eleanor the Great, It Ends with Us. I forget the name but it was about -- it's a film about the effects of the illegalization of marijuana, but I don't remember the name. That's what I got right now.
Q Five Feet Apart?
A That was not Wayfarer Studios.
Q Who did that film?
A CBS Films, but Wayfarer Entertainment got a production credit, but there was no financing.
Q Is Wayfarer Studios profitable?

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A I don't know. And I don't know how I -- we would quantify that. I don't believe so.
Q Are you the co-chairman of Wayfarer Studios?
A I am.
Q Do you hold any other titles with respect to Wayfarer Studios?
A I do not.
Q And what are your responsibilities as co-chairman of Wayfarer Studios?
A Mostly thinking of the future direction of where I would like to see the company going. I assist with creative. That's -- that's pretty much it.
Q Do you have any responsibilities with respect to the financials of Wayfarer Studios?
A No.
Q Do you have any responsibilities with respect to the day-to-day operation of Wayfarer Studios?
A No.
Q Would you say that Sarowitz is the money guy and you're the creative force behind Wayfarer Studios?
A Sarowitz is quite creative, but I think

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that would be a fair observation or summary of how the relationship started.
Q Has that changed over time?
A Somewhat, I believe. Steve's gotten much more involved in the creative, and I think that's -- yeah.
Q Do you have any responsibilities for Wayfarer's contractual relationships?
A No.
Q Do you ever review contracts before Wayfarer assigns them?
A No.
Q Do you have to approve any of the contracts that Wayfarer enters into before they're entered into?
A No.
Q Do you always star in the films that Wayfarer produces?
A No.
Q How many of them have you starred in?
A One.
Q It Ends with Us?
A Yes.
Q Do you always direct the films that Wayfarer produces?

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A No.
Q How many have you directed?
A Two.
Q Which ones?
A Clouds and It Ends with Us.
Q How long were you a working actor before you founded Wayfarer Studios?
A I've been a working actor for -- well, I didn't work this year. But if we include this year, 20, 21 years. And this is embarrassing math. 2019, five, six, so 15 years or so.
Q You've mentioned a shared faith with Steve Sarowitz. What faith is that?
A The Baha'i faith.
Q How did you come to the Baha'i faith?
A I was born into the Baha'i faith. And then at 15, as is customary for all Baha'i's, I was given the choice to decide if I felt I was a Baha'i. We believe in the independent investigation of truth. So the idea that we don't just become something because our parents are. So at 15, I decided that I was a Baha'i.
Q Do you think the tenets of that faith influence the mission or thesis behind Wayfarer Studios?

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A I believe so, yeah.
Q How so?
A As Baha'i's, we're told that our work should be a form of service. And so I've always operated with the belief that whatever it is that I do, whether it's in entertainment or anything else, I wanted to find a way for it to be of service. And with Wayfarer Studios, we just wanted to apply some of those same tenets to the studio. The idea that we can create things that elevate consciousness in some abstract way, but without being preachy. And with very universal themes, like the elimination of prejudice, the belief in equality, the telling of stories that maybe don't always get told because Hollywood doesn't maybe feel that they are worth telling.
So in that sense, I believe that our faith has influenced.
Q Over the course of your career or otherwise, have you ever received or been through any media training?
A I went through some media training on Five Feet Apart. I'm not sure if I did any media training for It Ends with Us. I don't believe I did.

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Q Other than when you went through media training in relation to Five Feet Apart, can you think of any other times where you've received or been through any media training?
A As I sit here right now, I can't.
Q Over the course of your career or otherwise, have you had any formal acting training?
A Like acting classes? Yes. Yes.
Q How about directing?
A No.
Q Over the course of your career or otherwise at any time, have you ever received or been through any sort of leadership training?
A I think I've had coaching, but I can't think of any formal training.
Q Can you describe for me that coaching?
A I can't remember much about it, unfortunately.
Q Do you know about when that was?
A In my 20s. My late 20s maybe.
Q And other than this leadership coaching, have you ever been to any leadership seminars or programs?
A Like as an attendee?
Q Yes.

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A I can't think of any right now.
Q In any other role than an attendee?
A I started speaking in my 30s, and I don't know if I ever spoke at one or not.
Q Do you know a gentleman by the name of Labid Aziz?
A Yes.
Q Who is he?
A Labid?
Q Yes.
A was the original COO of Wayfarer Studios.
Q And when did he cease operating in that role?
A I think about a year into his role.
Q Was he a good COO?
A I'm not sure I'm qualified to judge what a good COO is.
Q Did you ever have any concerns personally with him in his role as COO?
A I did.
Q What were those concerns?
A I felt he would often promise things in dealmaking that weren't possible. He was a bit of a wheeler and a dealer, and there were certain

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instances where I did not feel he was telling the truth.
Q Can you identify any of those incidents for me?
A I just remember getting phone calls saying, like, Labid said this or Labid promised this and being very confused because that wasn't something that he could be promising. It was important to me that we were always honest and that we didn't enter into deals with people and make promises that we couldn't keep. And I didn't always feel that that integrity was -- was -- didn't always feel he operated with that -- that integrity.
Q Can you give me any specific examples?
A The one I can think of right now is my dad is also in the entertainment business. He was one of the founding fathers of what is called product placement. And I always wanted to work with my dad, and it's a sweet relationship. But I remember my dad told me that he had promised Labid -- or Labid had promised him that he could build out an entire product placement division of Wayfarer Studios and that he would put him on a salary. And -- and I think he got my dad's hopes up, which my dad, you know, was 70, and that wasn't ever part

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of the plan. And I didn't like that he was promising things to even my own family. And yet, I believed that he thought that he could maybe do those things. But there -- the proper protocol was not followed of, like, do we want to build a division. So I didn't feel like that was honest. That's what I can think of right now.
Q Other than that, can you think of any other specific examples?
A I can't.
Q Okay. I think now is probably a good time for a break, if you would like one.
THE WITNESS: I have to pee so that's great.
MS. SHAPIRO: I just want to put on record -- I should have done this before -- that we're designating the entire deposition confidential pursuant to the protective order.
MS. SHAH: Understood.
MS. SHAPIRO: Thank you.
THE VIDEOGRAPHER: We are going off the record. The time is 10:21 a.m.
(Recess.)
THE VIDEOGRAPHER: We're back on the record. The time is 10:49 a.m.

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BY MS. SHAH:
Q I want to come back to the -- your use of Signal.
A Uh-huh.
Q I think you testified earlier this morning that you had never used Signal before Blake's complaint was filed in December of 2024.
Am I getting that correct?
A I had the app, but I wasn't a participant, like, doing anything on the app.
Q Do you recall when you downloaded the app?
A I recall two different times that I had downloaded the app. The first time I ever heard of Signal was from Stephanie Jones. And I don't know how long ago that was. I feel like that was -- I close my eyes sometimes because I visualize so I understand where I am. I believe it was in 20 -- I think it was around 2020.
She had told me that was her preferred method of communication, but we never communicated on Signal. And then -- and then I think your phone just gets rid of it when you don't use it. And then I downloaded it again. I joined a men's group and they had their group on Signal. But then I was

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unable to join officially the men's group so I never joined that group on Signal. And then so it was just kind of an app that was there.
And then I downloaded it probably the day after or two days after the New York Times article and the lawsuit.
Q When you downloaded it a day or two after the New York Times article and the lawsuit, why did you do that?
A I believe it was a group decision to move all of our chats to Signal.
Q Who was in that group that made that group decision?
A My attorneys. I believe all the defendants here.
Q Melissa Nathan?
A Yes.
Q Jen Abel?
A Yes.
Q Jamey Heath?
A Yes.
Q Steve Sarowitz?
A I think he eventually joined, yes.
Q But not at first?
A Steve is always in his own world.

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Q Jed Wallace?
A Yes. Yes. Eventually, yes.
Q But not at first?
A I -- I had never met Jed so I don't know if he was originally on there. At the time --
Q You knew who he was?
A I knew who he was. I had heard the name Jed, but I knew who -- I learned who he was around the time of the lawsuit, yeah.
Q What do you mean you learned who he was --
MS. SHAPIRO: Just --
BY MS. SHAH:
Q -- around the time of the lawsuit?
MS. SHAPIRO: Mr. Baldoni, don't reveal any information that you learned from your attorneys.
THE WITNESS: I learned his last name and that he was being sued. And that's when we met.
BY MS. SHAH:
Q When you say that's when you met, what do you mean?
A That's the first time we ever met.
Q In person?
A No, we never met in person.

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Q So when you say that's the first time you ever met, do you mean that's the first time you were ever on a direct communication with him?
A Yeah.
Q Prior to that point in time, do you recall being on any communications, whether phone call, in-person meeting, Signal, text, email or any other form of communication where Jed Wallace was also a participant that you were on?
A No.
Q Before that time, do you recall ever hearing his name before?
MS. SHAPIRO: Objection.
MS. SHAH: Whether orally, on a phone call, in a text message, in an email, or through any other form of communication?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MS. SHAH:
Q When?
A I believe around the time that I -- no. After -- after I met Melissa Nathan.
Q Melissa Nathan introduced you to Jed Wallace; is that right?
A I have -- I was never introduced to

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Jed Wallace.
Q Melissa Nathan is the first person who ever mentioned the name Jed Wallace to you; is that right?
A No. I don't believe so.
Q Who is?
A I think it was Jamey. I think Jamey, yes.
Q What do you recall about that instance where Jamey first mentioned the name Jed Wallace to you?
A I recall -- I recall a brief conversation around Melissa's employees. And it was around that same conversation I -- I think I heard the name Breanna and Jed. Like they were part of a team or something.
Q Was it your understanding around the time of that conversation that Jed was one of Melissa's employees or associated with Melissa's work?
MR. GLOVER: Objection. Form.
THE WITNESS: I don't think I had an understanding. I think I wasn't thinking about anything like that.
BY MS. SHAH:
Q Why were you not thinking about anything

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like that?
A I wasn't thinking about who was an employee or an associate. It was just this is a team.
Q And it was your understanding around the time of that conversation that as part of the team that was being brought on to help you with crisis comms, Jed Wallace would be part of that team, right?
A Yes.
Q And you gained that understanding, at least at first, from Jamey Heath; is that right?
A I believe so, yes.
Q And your understanding around the time of that conversation was that Jed Wallace was going to come on as part of the crisis communications team to handle the social and digital side of things, right?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure I was aware of that. I just was hiring crisis PR.
BY MS. SHAH:
Q And you had no awareness or understanding of what Jed did or was to do for you in the realm of crisis PR?

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A I still don't think I know what Jed does.
Q Why do you say that?
A I like to think of myself as someone who is tech savvy or who understands the Internet. But I'm -- I don't. I guess I still don't think I really have ever grasped what he does.
Q And that's because what he does with respect to the Internet is highly technical and complicated, right?
MR. GLOVER: Objection. Form.
THE WITNESS: Maybe.
BY MS. SHAH:
Q What is it that you don't grasp about what he does with the Internet?
A I know him to be someone that sends a lot of reports. Like a lot of reports. So...
Q What kind of reports?
A Like somebody who spends a lot of time on the Internet Googling and looking up anything that is involved with this case or my name. And then presenting those reports and saying, this is what's happening.
Q What's so complicated about that?
MS. SHAPIRO: Objection.
THE WITNESS: Well, I don't know if

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that's what his job is. I just -- that's what I don't understand.
BY MS. SHAH:
Q How many -- how many of those such reports has he ever sent to you?
MS. SHAPIRO: Objection.
THE WITNESS: I think that's privileged.
BY MS. SHAH:
Q Did he always ever send those reports to you at the same time as he sent them to your attorneys?
A I've never gotten an individual report, no.
Q So why do you know him as someone who sends reports?
MS. SHAPIRO: Instruct you not to --
THE WITNESS: Yeah, I can't answer that.
MS. SHAPIRO: -- answer to the extent that the answer comes from communications with your attorneys.
BY MS. SHAH:
Q Did you come to the understanding that Jed Wallace sends these such reports before Blake's lawsuit was filed on December 20th?
A No.

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Q You had hired Jed Wallace to be part of your crisis comms team in August of 2024?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: I didn't hire Jed Wallace.
MS. SHAH: Who did?
MS. SHAPIRO: Objection.
THE WITNESS: I assume --
MS. SHAPIRO: Don't -- don't assume anything.
THE WITNESS: Wayfarer.
BY MS. SHAH:
Q You understood Jed Wallace to be working, at least in part, on your behalf with Melissa Nathan's team during this crisis period in August of 2024, right?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I don't know if I understood that.
BY MS. SHAH:
Q What did you understand him to be doing in that time period?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know. Whatever

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Melissa was doing.
BY MS. SHAH:
Q Did you have attorneys involved in that time period?
A No.
MS. SHAPIRO: Objection. Form.
BY MS. SHAH:
Q When did you first get attorneys involved?
A December 21st or 22nd.
Q Did you have any understanding from August of 2024 to December that Jed was creating any such reports for you?
MR. GLOVER: Objection. Form.
THE WITNESS: No.
BY MS. SHAH:
Q You only learned that after the lawsuits were filed in December of 2024?
A Yeah.
Q When you learned that Jed was creating such reports in December of 2024, was it your understanding that he had only just started creating those reports after the lawsuit was filed or that he had been creating them earlier?
MS. SHAPIRO: Objection.

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MR. GLOVER: Objection. Form.
MS. SHAPIRO: And I direct you not to answer to the extent any information you have only comes from your attorneys.
THE WITNESS: I don't know.
BY MS. SHAH:
Q You don't know one way or another whether Jed only started creating these reports in December of 2024 or whether he had been creating them earlier?
MR. GLOVER: Objection.
MS. SHAPIRO: Objection. And, again, don't reveal any privileged communications of anything you learned from your lawyers.
THE WITNESS: I genuinely don't know.
BY MS. SHAH:
Q You mentioned earlier that when you started using Signal to communicate after the lawsuits were filed, it was a group decision that involved a number of people and your attorneys?
A Yes.
Q Which attorneys?
THE WITNESS: Am I allowed to answer attorneys?
MS. SHAPIRO: Yeah, no, I'm going to

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direct you not to answer that question.
MS. SHAH: You're going to direct him not to give me the names of which attorneys were involved in the Signal chats?
MS. SHAPIRO: That's not what you asked. You were asking him about his discussions with his attorneys about using Signal.
BY MS. SHAH:
Q Who were the attorneys that were involved in the Signal chats?
MS. SHAPIRO: You can answer the names.
THE WITNESS: Bryan Freedman.
You can totally get it. It's okay.
Bryan, Summer, Mitra, Jason, Teresa. Alexandria and Jonathan weren't on the team. Yeah.
BY MS. SHAH:
Q Whose idea was it to move your communications to Signal?
A I don't remember.
Q Was it yours?
A I don't know.
Q Is it possible that it was your idea?
MS. SHAPIRO: Objection.
THE WITNESS: Yeah.

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BY MS. SHAH:
Q Did you understand the purpose of moving these communications to Signal to be that the messages would disappear?
A I understood that to be part of it, yeah.
Q What was the other part of it?
A Getting hacked.
Q You had concerns about your phones being hacked?
A Yeah.
Q Okay.
A Privacy.
Q In the time starting when the lawsuits were filed in December 2024 that you began using Signal with this group of people that you've described, in every single message that you sent or received was there at least one attorney present on that message thread?
MS. SHAPIRO: Objection. Form.
THE WITNESS: I'm sorry. Can you -- it was a long question.
BY MS. SHAH:
Q Since you began using Signal from the time these lawsuits were filed, was there an attorney present on every single message that you

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sent or received?
A Was an attorney present in every message I sent -- no, because I had -- there were friends that reached out to me on Signal too.
Q Which friends?
A That friend, still trying to get me.
THE WITNESS: Is your son okay?
THE STENOGRAPHIC REPORTER: Sorry. Yeah, he's fine. Just need to -- these are brand new iPads. I apologize.
MS. SHAH: It's all right. Let us know if you want to take a break.
THE STENOGRAPHIC REPORTER: Okay.
MS. SHAPIRO: What was the question?
BY MS. SHAH:
Q Which friends?
A Which friends texted me on Signal?
Q Uh-huh.
A I remember my friend Brett texted me, my friend John. I wasn't responding to very many texts during that time. Ahmed.
THE STENOGRAPHIC REPORTER: Sorry, Ahmed?
THE WITNESS: Ahmed, sorry. I lost my voice this weekend.
THE STENOGRAPHIC REPORTER: That's okay.

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THE WITNESS: Those are the three I can think about that are not in this lawsuit right now, of friends specific to your question.
BY MS. SHAH:
Q Anyone else?
A Mitz from Wayfarer. And can you repeat the question one more time? I just want to...
Q Who can you recall, whether friends or otherwise, who texted you on Signal that was not part of your defendants and attorneys group?
A That's what I can think of right now. If more come to me later, I will share. But they were not -- when friends texted me, it was not about the lawsuit. They were just texting me.
Q Were they in the habit of texting you on Signal before this?
A No.
Q So they only started texting you on Signal after the lawsuits were filed?
A Yes.
Q And they were texting to check in on how you were doing in the wake of the lawsuits being filed?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.

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BY MS. SHAH:
Q Did you respond to any of those texts?
A I'm sure I did. I had asked them to text only on Signal.
Q You had asked them to text only on Signal. Had they texted you by a non-Signal method ahead of that?
A They had called. I was really not in a good place. I didn't want to talk.
Q Do you have your cell phone on you right now?
A I don't.
Q Do you have your cell phone in the back room?
A It's in a bag somewhere probably.
Q Do you always set your Signal messages to auto delete?
A I set them to whatever the Signal auto thing is.
Q Are you aware that when message threads originate on the Signal app, they do not self-delete and you have to go in and for each method -- each message thread, if you want it to delete in a certain amount of time, you have to go in and change that setting?

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MS. SHAPIRO: Objection.
THE WITNESS: I thought it was the opposite. But now I know.
BY MS. SHAH:
Q I could be mistaken.
A Yeah, I thought it was -- it starts auto delete and then you have to stop it from. But you could be right and I could be wrong.
Q Do all of your Signal message threads auto delete?
A No.
Q There are some that do not auto delete?
A I believe none of our -- if I'm allowed to say -- none of our legal threads auto delete.
Q Any of the non-legal threads that do not auto delete?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sure -- yeah, I'm sure there are some.
BY MS. SHAH:
Q Have you manually deleted any Signal messages since these lawsuits were filed?
A No. No.
Q During a break in this deposition, can you look at your phone, open your Signal app, and

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see whether there are any non-legal Signal threads still present on there?
MS. SHAPIRO: I'm going to object to that. Direct you -- I'm going to object to that.
MS. SHAH: You're going to instruct him not to do that?
MS. SHAPIRO: Yes.
MS. SHAH: Okay.
BY MS. SHAH:
Q Would you be capable of doing that if not for your lawyer's instruction?
A I would hope so, with my hands and fingers and brain capacity.
Q Are you going to follow your lawyer's instruction?
A I think I probably should.
Q What do you recall texting with Mitz at Wayfarer about on Signal?
A This whole time period was -- it was crazy. So give me a second. I believe I was sending Mitz screenshots of a lot of old text messages.
Q Which old text messages?
A Things that I believed would help me in telling the truth about what actually happened.

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Q Text messages with Blake?
A No.
Q Text messages with Stephanie Jones?
A I don't believe I shared any of those with Mitz. No.
Q Text messages with Jen Abel?
A No.
Q Text messages with Melissa Nathan?
A I didn't have any text messages with Melissa Nathan.
Q Text messages with whom then?
A My memory -- text messages with my -- my health coach. Text messages with Don Saladino.
Q Who is your health coach?
A Jennifer Benson.
Q What does she generally do for you?
A She's not my current health coach.
Q What should she generally do for you when she was your health coach?
A She tried to keep me healthy.
Q How?
A Supplements, peptides, helping my immune system.
Q What about your text messages with your health coach did you believe at that time would help

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you explain the truth of what happened?
A If my memory is correct, I was being accused of many things. But one of them was, like, putting Ms. Lively on a phone call with a dietitian, which was a lie and an extreme distortion of the truth.
Q Who is Dan [sic] Saladino?
A He's a personal trainer.
Q Is he Ms. Lively's personal trainer?
A I would assume so.
Q And what about your text messages with him did you believe at the time would help you demonstrate the truth of what had happened?
A The communication between him and myself that showed that he was also working with me.
Q How many screenshots do you recall sending to Mitz?
A I wish I could tell you. I don't know.
Q More than two?
A Yeah.
Q More than five?
A Probably.
Q More than ten?
A That was a very hard time. I will say yes.

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Q More than 15?
A I don't know.
Q More than 20?
A I don't know. I want to help you. I -- I genuinely don't know.
Q It's possible it was more than 20?
MS. SHAPIRO: Objection.
THE WITNESS: That feels like a lot. I don't know.
BY MS. SHAH:
Q Is it possible it was more than 50?
MS. SHAPIRO: Objection.
THE WITNESS: I would be very surprised. That's -- that's a lot.
BY MS. SHAH:
Q Does your Signal thread with Mitz auto delete?
A I -- I don't know. I don't -- I'm not sure.
Q Have you gone back since this litigation started to look at it to see if it's still there?
A No.
Q Can you do that during a break?
MS. SHAPIRO: Objection.
MS. SHAH: Are you going to instruct him

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not to do that?
MS. SHAPIRO: Yes, I am.
BY MS. SHAH:
Q Are you going to follow your counsel's instruction?
A I think I am.
Q Are you capable of doing it, if not for your counsel's instruction?
A I would like to think I am.
Q Other than texts with your health coach and texts with Dan Saladino, do you recall sending to Mitz screenshots of texts involving anyone else?
A Not that I can think of.
Q Do you recall sending to Mitz texts of screenshots that had anything to do with Stephanie Jones or Jonesworks or the work that you did with Stephanie Jones or Jonesworks?
MS. SHAPIRO: Objection.
THE WITNESS: There was very little conversation about Stephanie Jones at all during this time.
BY MS. SHAH:
Q Why is that?
A Because I don't think she was top of mind.

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Q You said that you had either joined or tried to join a men's group that had a Signal group chat; is that right?
A Yes.
Q What was that men's group?
A It was a group put on by a man named John Wineland. And I wasn't able to commit to the men's group and commitment is a huge part of men's work. So they had added me to the chat, but then I let him know I wasn't able to commit. So then I was not a part of it.
Q Why were you unable to commit?
A I was making a movie.
Q What movie?
A It Ends with Us.
Q You said commitment is a huge part of men's work. What do you mean by that?
A Men's work is based on agreements. And in order to feel vulnerable enough to show any parts of yourself that over the years you would be embarrassed or ashamed with, or to feel truly vulnerable so that you can do good work and be with other men in a sacred space, there are agreements that have to be made beforehand. Like, commitment to show up on time, commitment to, you know, not

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miss the meetings, commitment that you're able to actually attend the in-person retreat because those agreements create safety.
Q Had you ever done men's work in the past?
A Yes.
Q How many times?
A I think -- I think it could be considered that some of my daily practice is men's work so I don't think I can give you a number.
Q Over how many years?
A My 30s.
Q What is the purpose of the men's work you do?
A If I were going to distill it, it would to attempt to be an open, kind man.
Q Do you think men need to work on that in order to become that way?
A I think every human does.
Q Then why is it called men's work and not people work?
A Because I believe -- I'm not going to -- I'm not the one who invented or created men's work, but I can give you my opinion, if that's okay.
Q Please.
A I believe that men have to do work with

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men. I think that integration with men and women is, more than likely, very tricky. And I think that women do a lot of work with women. And I think that both men and women need safe spaces for healing.
Q Healing what?
A How much time do you have?
Q Give me the 35-second answer.
A Healing, what, collectively? Healing, what -- what do men and women need to heal from?
Q Sure.
A Millennia of trauma, abuse. Generations and generations of trauma that's been passed down from our families and parents and interpersonal relationship trauma. I'm assuming that was 35 seconds.
Q Do you have a practice of taking handwritten notes?
MS. SHAPIRO: Objection.
THE WITNESS: At times.
BY MS. SHAH:
Q Describe that to me.
A I -- I've always struggled in school. And sometimes when I'm listening to something, I need to write down. Sometimes it helps me remember.
Q Do you carry a notebook dedicated to your

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handwritten notes?
A Sometimes.
Q Do you carry it everywhere you go?
A No.
Q You only carry it sometimes?
A I don't have just one. I'm not -- I'm not like a journalist notetaker that always walks around with it, no.
Q Did you take handwritten notes in connection with your work on the film It Ends with Us?
A There were a few days that I did, yes.
Q Only a few days?
A Yes.
Q Did you take handwritten notes in connection with any of the publicity or other work you did with Jonesworks or Stephanie Jones or Jen Abel while she was at Jonesworks?
A No.
Q Have you brought a notebook to take handwritten notes to these depositions?
A Yes.
Q Which depositions?
A Blake Lively, and Steve Sarowitz the other day.

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Q Any others?
A No.
Q Did you take handwritten notes during those depositions?
A Yes, but for my lawyer.
Q Only for your lawyer?
A For both of us.
Q Only for you and your lawyer?
A Yeah, I don't know who else it would be for.
Q Do you still have those handwritten notes?
A I believe I do.
Q Did you take any handwritten notes in preparation for your deposition?
MS. SHAPIRO: Objection. I direct you not to answer. It's on -- it's on the record.
THE WITNESS: What is that?
MS. SHAPIRO: I direct you not to answer.
THE WITNESS: I'm directed not to answer.
MS. SHAH: Can he answer a yes-or-no question? Did he take any handwritten notes in preparation for this deposition; yes or no?
MS. SHAPIRO: Yes.
THE WITNESS: Yes.

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BY MS. SHAH:
Q How many pages?
MS. SHAPIRO: Just -- I'm going to object to this line. This is work product.
MS. SHAH: Are you instructing him not to answer?
MS. SHAPIRO: Yes, I am.
BY MS. SHAH:
Q Do you still have those handwritten notes?
MS. SHAPIRO: Objection.
THE WITNESS: They were shared with my attorney.
BY MS. SHAH:
Q So you're saying your attorney has a copy of the handwritten notes?
MS. SHAPIRO: Objection. I direct you not to answer these questions.
BY MS. SHAH:
Q My question was: Do you still have the handwritten notes; yes or no?
MS. SHAPIRO: You can answer that yes or no.
THE WITNESS: Yes.

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BY MS. SHAH:
Q Okay. Do you keep a diary?
A I wish I did. God, I wish I did.
Q Is that a no?
A It's a no. I've always -- I've wanted to but I --
Q Do you have a practice of writing daily affirmations?
MS. SHAPIRO: Objection.
THE WITNESS: Sometimes, yes.
BY MS. SHAH:
Q Do you write daily affirmations?
A Currently, no.
Q Have you in the past?
A Yes.
Q Have you in the past year?
A Possibly.
Q Have you in the past three years?
A Yes.
Q Do any of those daily affirmations bear on or relate to anything having to do with your work in connection with the film It Ends with Us or any publicity work?
MS. SHAPIRO: Objection.
THE WITNESS: Not unless me saying I am

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confident and brave and strong. And I mean, if you think that, it's like those kind of affirmations, yes.
BY MS. SHAH:
Q When did you first meet Stephanie Jones?
A I don't remember the year, but 2018, 2019, 2017. It's one of those three years. I --
Q Do you remember when you first started working with Stephanie Jones or Jonesworks?
A I remember the feeling. Are you asking me do I remember the day, like, the dates or the year or --
Q Yes. Do you remember when in time?
A As I sit here, I can't remember the year or when in time.
Q Did you meet Stephanie Jones long in time before you started working with her as a publicist?
A I believe I was introduced to her and we had a phone call, but I don't know how long after that we started working together.
Q Was it years?
A After the phone call?
Q Uh-huh.
A I wish I could answer. I don't know exactly.

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Q Where were you in your career when you started working with Stephanie Jones as a publicist?
A I was on a TV show called Jane the Virgin.
Q Had you had a publicist before that?
A Yes.
Q Who was that?
A I had a few. Oh, gosh, the name Sunshine rings a bell or Sun- -- my first publicist's name was Siri, before phones. I had had a few. I -- I'm so sorry, I don't remember the names of the organizations.
Q Why did you switch to Stephanie Jones as your publicist when you began working with her?
A I heard she was amazing.
Q Who did you hear that from?
A The person who introduced us said she had a lot of really great clients.
Q And you began working with Stephanie Jones as a publicist in your personal capacity at first, right?
A Yes.
Q As an actor?
A Yes.
Q And then at sometime thereafter, she

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began working also with Wayfarer Studios; is that right?
A When Wayfarer Studios was formed, I was already a client of Stephanie Jones as an actor.
Q Uh-huh.
A And then after Wayfarer Studios was formed, then the company, I believe, started to work with the company, yeah.
Q Okay. And after Wayfarer Studios was formed, Stephanie Jones worked as a publicist, both for Wayfarer Studios and for your personal publicity moving forward, right?
A The company did, yeah.
Q The company being Jonesworks?
A Jonesworks, yeah.
Q Okay.
Did you feel, at the time when you began working with Stephanie Jones, were you happy with her work?
MS. SHAPIRO: Objection.
THE WITNESS: Can you be more specific?
BY MS. SHAH:
Q Do you feel she was supportive of your career?
A Yeah. Yeah.

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Q Do you think she did good work for you as a publicist?
A Stephanie was never my personal publicist, so that's hard for me to answer. But I was happy overall with what the company was doing for me.
Q How many times over the years would you say you communicated directly with Stephanie?
A Over the years? Like --
Q From the time you started working with her to the time you ceased working with her?
A I mean, we would text. Every once in a while, we would have a phone call. She'd always reach out and congratulate me if something was worth -- if there was something going on or she would send me words of encouragement if I was going to do something or if there was press. But I can't give you an exact number.
Q Did you appreciate the words of encouragement when she sent them to you?
A I did.
Q Did she come to know your family during the time she was working with you?
A Not intimately, but yeah, she did.
Q Did you feel over the years that you were

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working with her before you began filming It Ends with Us, did you feel like you generally had a positive relationship with Stephanie Jones?
A Yeah.
Q Did you feel that she was generally supportive of you and your career?
A Yeah.
Q Did you feel like she and Jonesworks did good work for you as a publicist?
A I believe they did.
Q Would you agree that she took you on as a client at a relatively early stage in your career?
A I'm not sure about that one.
Q She had a lot of big name clients then, right?
A Yeah.
Q And you were relatively earlier in your career at that point than those big name clients, right?
MS. SHAPIRO: Objection.
THE WITNESS: In comparison, yes. Yeah.
BY MS. SHAH:
Q From the time you began working with Stephanie Jones up until you began filming It Ends with Us, did you ever have any issue with

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her?
A Can you repeat that question?
Q From the time you began working with Stephanie Jones until the time you began filming It Ends with Us --
A Uh-huh.
Q -- did you ever have any issue with Stephanie Jones?
MS. SHAPIRO: Objection.
THE WITNESS: I don't recall any issues. Like, a personal issue, is that what you mean?
BY MS. SHAH:
Q Or professional issue?
A No.
Q Did you ever have any reason to fire her?
MS. SHAPIRO: Objection.
THE WITNESS: No, I remember feeling -- I can remember feeling she didn't have much time for me. But I'm also a realist to know that I'm not The Rock or, you know, so I understood that I was a client but that she was having other people manage me and my career. So there were times when I -- there were many times where I didn't feel she had time for me and that I was just kind of there. But there was no reason to fire her, no, not at all.

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BY MS. SHAH:
Q During the times when you felt she didn't personally have time for you, were there other publicists at Jonesworks that did respond on the day to day for your issues?
A Oh, always. Yeah.
Q At some point in time, the publicist who was most responsible for the day to day on your and Wayfarer's account at Jonesworks was Jen Abel; is that right?
A Yes.
Q Did you work very closely with Jen Abel over that time?
A I did.
Q Okay. In the times -- during the time that Jonesworks was your publicist, before the filming of It Ends with Us, did they ever help handle any controversies for you or Wayfarer?
A Any controversies? Would you help me with controversies?
Q Anything you would consider to be a crisis?
A Nothing that -- nothing that became public. But if there was ever something that I felt, like, anxious about, yes.

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Q Does that include when you were sued in connection with Five Feet Apart?
A Yes.
Q Did you consider that to be a crisis?
A I felt like it was a crisis. Yeah.
Q Did Stephanie Jones help you in connection with that crisis?
A There was no PR. It wasn't like a big public thing. But I definitely remember calling her and Jen about it. Yeah.
Q Did she recommend a lawyer to you for that lawsuit?
A I don't remember. She might have.
Q Were there times over the course of your relationship with Stephanie, between when you first hired her and when you began filming It Ends with Us, that you would request a phone call directly with her to deal with an issue?
A I don't think I ever had to request. I think I would just call her. Like it wasn't, like, a formal process. I would just call her.
Q Okay. And would she be responsive?
A Yeah. She would always call me back if she didn't answer then.
Q Do you recall ever making a comment to

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her that you'd never gotten her voicemail?
A I remember oftentimes telling Stephanie that she needed to take a break because she was always on. And joking with her, like, you got kids and, like, you can only imagine the phone calls and all the people that were -- she was getting. So I could imagine that I made that comment.
Q Do you recall a time when you introduced her to Colleen Hoover?
A I think I do, actually.
Q What do you recall about that?
A I didn't until you just brought it up. But I recall -- I recall learning that Colleen Hoover had done, like, nail polish or something for the book. And I couldn't believe it. And I believe she was getting backlash. Which ultimately was terrible for the project we were developing, this movie. And I remember asking Colleen if she had anybody that was helping her make decisions, like, and she said no. I said, "I think you need a publicist." And so I introduced her to Stephanie Jones.
Q Because you believed that Stephanie Jones could help her with the publicity issues she was experiencing?

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A I believed that Stephanie could help her in general. I think that to be in the situation that Colleen was in and to not have any support or anyone telling you, like, maybe that's not a good idea, I thought Stephanie could help.
Q And you trusted Stephanie at that time to help, right?
A Yeah.
Q Do you recall introducing her to Colleen by saying "this is my friend, Stephanie Jones"?
A I'm sure I did. I considered her a friend.
Q Do you recall telling Colleen that Stephanie was a master publicist?
A I don't. But I could see myself saying that, yeah.
Q Would that have been accurate in terms of your view at the time? Did you think Stephanie was a master publicist?
A Yeah.
Q Do you recall a time when you learned that Business Insider was planning to publish a negative story about Stephanie Jones?
A Yes.
Q When did you learn that?

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A The, like, year or month or?
Q As specific as you can give me.
A I know who I learned it from.
Q Who was that?
A Stephanie Jones.
Q What did she tell you?
A She told me -- I don't remember the exact words. But she was very upset. And she was -- she FaceTime'd me crying. And she said that they're, like, trying to ruin her life or something. She was very emotional. I don't remember exact words.
Q Did you feel for her in that situation?
MS. SHAPIRO: Objection.
THE WITNESS: I did. It was very complicated.
BY MS. SHAH:
Q Why was it complicated?
A Because she was my publicist. And I was struggling during that period myself. I didn't have a lot of emotional bandwidth. And we -- while I considered her a friend, I think there are different levels of friendship. And that conversation, it felt -- it felt like I might have not been the best person for her to be FaceTiming with these feelings.
Q Why?

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A Because I was her client. She was meant to be my publicist. And it was -- it was the kind of call you might have with a therapist.
Q Did you offer to write her a letter of support to the Business Insider reporter?
A After she asked me to, I did.
Q And did you, in fact, do that?
A I did.
MS. SHAH: I would like to hand you a document. We're going to mark this as Exhibit 1, please.
(Exhibit 1 marked for identification.)
BY MS. SHAH:
Q For the record, this is a text thread between you and Stephanie Jones dated July 3rd, 2024. It bears the Bates stamp of JONESWORKS_JB_, several zeroes, 1434.
Do you see this?
A Uh-huh.
Q Do you recall this text thread exchanged between you and Stephanie Jones?
A Vaguely. But yes.
Q And you write up at the top. She asks you if you would be open to writing a sentence or two for Business Insider about her and Jonesworks.

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And you respond:
(As read):
"Hi Steph, I'm so sorry you're going through this. I'd be happy to."
Do you see that?
A I do.
Q Were you happy to?
A Being completely honest, I don't know if I was actually happy to. I think that was what you say, like, I'd be happy to.
Q But you were willing to?
A Absolutely.
Q And she goes on to describe the types of things that might be appearing in the Business Insider story and the things that the reporters were saying when they were calling her clients.
Do you see that?
A Is this paragraph two?
Q Paragraph two through the end of the page.
A Okay.
Q And do you say -- see at the bottom where she writes:
(As read):

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"Also they wouldn't say a man was 'aggressive' or 'tough' or 'intense.' Those are the words they're using when they call clients."
Do you see that?
A I do see that.
Q Flip the page for me. You write:
(As read):
"I'm sorry you're going through this. Of course not; it's gendered."
Do you see that?
A I do.
Q What did you mean by "it's gendered"?
A I was just -- again, I don't remember exactly what I was feeling in that -- this moment. I know I was -- I do remember feeling again, like, this to me, it made me uncomfortable. I didn't want to tell her that because she was going through so much. It was interesting to be asked by your publicist, whose job it is to handle public relations, to make a public statement for your publicist. So I -- I know I felt uncomfortable.
And from what I'm reading, she says "they wouldn't say a man was aggressive or tough or intense". So I think I was agreeing with her.

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Trying to make her feel seen by saying "of course not; it's gendered."
So I was under the assumption that what she was saying was that the words we use to describe men are not used in the same way to describe women. So that's, I'm assuming, what I meant when I said "it's gendered."
Q And that the words being used to describe women, like those that she wrote here, are used negatively; whereas, they would not be used negatively as against male professionals. Is that what you understand she was saying?
MS. SHAPIRO: Objection. Objection.
THE WITNESS: I believe that's what she was saying. I'm just not sure I fully agree. But I believe that's what she was saying.
BY MS. SHAH:
Q Do you not agree with that?
MS. SHAPIRO: Objection.
THE WITNESS: I think that a man being called aggressive, tough or intense would also be considered a negative statement.
BY MS. SHAH:
Q Do you think that the press would write articles about a male CEO being aggressive or

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intense or tough --
MS. SHAPIRO: Objection.
BY MS. SHAH:
Q -- the same way they would about a female CEO?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe we can make an absolute statement like that because I've definitely read things where press would say a man was aggressive or tough or intense in a negative way.
BY MS. SHAH:
Q Do you believe that the press is more apt to write negative articles about a female CEO being aggressive or tough than they are about a male CEO being aggressive or tough?
MS. SHAPIRO: Objection.
THE WITNESS: I want to help you here, I just don't know if we want to debate about gender because I'm not an expert in, like, how many articles are written from a male or female perspective. I know that I have seen many articles putting down male leaders by using aggressive or tough or intense. And I also know that there are much more male CEOs than female CEOs. So, again,

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I'm not a gender studies major so I couldn't give you -- but what I can say is that oftentimes when a woman is -- we'll say tough, that I think maybe people aren't as used to it. Because oftentimes, men have been in positions of power.
I don't know if that's helpful to you at all.
BY MS. SHAH:
Q Are we debating whether or not the press is more apt to write negative articles about a female CEO being aggressive or tough than they are to write articles about male CEOs being aggressive or tough?
MS. SHAPIRO: Objection.
THE WITNESS: I think I've forgotten what we're debating, to be honest with you.
BY MS. SHAH:
Q Do you think we're debating anything?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not even sure what your original question was.
BY MS. SHAH:
Q You used the word "gendered." What do you mean by that?
A You mean what did I mean when I wrote it?

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Q What do you understand the word "gendered" to mean generally?
A Something that would be encapsulated by one's gender. Maybe a behavior that is used in one way for one gender and another way for another.
Q Is that what you meant when you used it here?
A When I used it here, I was agreeing with Stephanie Jones because she was -- it appears to me that she was needing to vent and share that they are calling her aggressive or tough or intense. And she says here they wouldn't say a man was aggressive or tough or intense. So I am -- I'm just trying to make her feel better. Again, I can't remember exactly what I was feeling. But it looks to me like I'm saying, yeah, of course not; it's gendered.
Q Did you find her to be aggressive or tough or intense?
A There were times I called her mama bear because of her aggression. Which I said endearingly. But I didn't know -- I didn't know the Stephanie that she was inferring people or accusing her to be.
Q You had not experienced these kind of things from her yourself?

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MS. SHAPIRO: Objection. Objection.
THE WITNESS: No, I hadn't.
BY MS. SHAH:
Q Did you read the Business Insider article?
A No.
Q You never read it?
A No.
Q You don't have a view one way or another as to whether it was fair or unfair?
A I never read it, so I couldn't.
Q Okay.
MS. SHAH: I'm going to hand you another document.
THE STENOGRAPHIC REPORTER: I will take that.
MS. SHAPIRO: What was the exhibit number?
MS. SHAH: This is Exhibit 2. The one you have is Exhibit 1.
MS. SHAPIRO: Okay.
MS. SHAH: This is going to be Exhibit 2. So we're going to mark for the record Exhibit 2.
(Exhibit 2 marked for identification.)
THE WITNESS: Thanks.

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BY MS. SHAH:
Q Which is a document -- it's a text thread between you and Jamey Heath and Jennifer Abel dated July 3rd, 2024 marked with a Bates stamp Jonesworks_, several zeroes, 15478.
Do you see that?
A Uh-huh.
Q This is the same date as the text thread that we were just looking at in Exhibit 1.
A Uh-huh.
Q Do you recall this text thread?
A Yes, I do.
Q And in this text thread, you were working through with Jen Abel and Jamey Heath the content of the statement you are going to provide to Business Insider in support of Stephanie; is that right?
A Can I refresh my memory for a second and just read it?
Q Please, review it.
MR. FREEDMAN: Please read the entire document.
THE WITNESS: Thank you.
BY MS. SHAH:
Q Turn for me to the page that ends in the Bates stamp 15480, please.

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You will see a text from you at the top. It's marked 8:10 p.m, where you say:
(As read):
"How's this Jamey? I made it a little more me -- is this too much?"
And then you draft or paste a draft statement below. Do you see that?
A Uh-huh.
Q Okay. In that statement, you write:
(As read):
"Stephanie has always been an exceptional publicist and member of my brain trust not just for me personally, but also for my company, Wayfarer Studios."
Do you see that?
A Uh-huh.
Q Was that an accurate statement at the time you wrote it?
A Yeah. I think it's a -- to be truly fair, it's a bit of an exaggeration. But still true.
Q Are you in the habit of providing press with statements that are exaggerated?
MS. SHAPIRO: Objection.

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THE WITNESS: I would not call it a habit. I was just helping a friend.
BY MS. SHAH:
Q To help yourself or a friend, do you think you would provide the press with statements that were exaggerated from the truth?
MS. SHAPIRO: Objection.
THE WITNESS: I don't think I've provided any statements of, like, myself. This was a very rare thing for me.
BY MS. SHAH:
Q In this case, did you provide the press a statement that was exaggerated from the truth?
A Brain trust, looking back, feels -- no, I would say that that's okay, actually.
Q Do you --
A Because I did call on her from time to time. So I would say that this is -- I think it's fine.
Q Do you think it's accurate?
A At the time, I do think it's accurate.
Q Okay.
A Yeah.
Q Then you go on to say:
(As read):

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"She is an incredibly hard worker, and she finds a way to be available at all hours of the day, and has gone above and beyond to ensure the success of not just me but my company."
Do you see that?
A I do.
Q Was that a true statement at the time?
A I believe so.
Q Okay. Then you write:
(As read):
"She has built an amazing team who I also work very closely with, and I have never had a moment of hesitation in trusting her."
Do you see that?
A Yes.
Q Was that a true statement at the time?
A It was.
Q And then you go on to write:
(As read):
"Her advice and guidance has always been spot on. I have never personally witnessed her mistreat anyone and on the contrary she has always treated me

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and my team with the utmost respect; like family."
Do you see that?
A I do.
Q Was that an accurate statement at the time?
A It was.
Q And this in sum and substance is similar to the statement that you ultimately did provide to Katie Warren, who was a reporter at Business Insider, right?
A I would assume so.
MS. SHAH: Okay.
Can you pull tab 33, please?
(Exhibit 3 marked for identification.)
THE WITNESS: Are we done with this one?
MS. SHAH: Yes.
THE WITNESS: You got it.
BY MS. SHAH:
Q This is going to be marked as Exhibit 3. It's an email from you -- sorry. From you to Katie Warren and then from Katie Warren to you --
A Uh-huh.
Q -- dated July 3rd, 2024 and July 4th, 2024, that bears the Bates stamp JONESWORKS_JB_,

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several zeroes, 651.
Do you see that?
A Uh-huh.
Q Do you remember sending this email to Katie Warren?
A I believe I do.
Q Do you remember her email back to you?
A I believe I do.
Q All right. And if you read the statement that you sent to Katie Warren, is there anything untrue in this statement?
A Do you mind if I just read it?
Q Please do.
Anything untrue in that statement?
A No.
Q Okay. And then Katie Warren responds:
(As read):
"Thank you so much for sending this. Are you free for a quick call sometime today or tomorrow?"
Do you see that?
A I do.
Q Did you ever have a call with Katie Warren?
A I did not.

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Q Did you ever respond to this email?
A I did not.
Q Okay. Did you ever -- other than the text thread that we looked at a moment ago in Exhibit 2 between you and Jen Abel and Jamey Heath, did you ever have a phone conversation with Jen Abel about the topic of the Business Insider story?
A I believe I did.
Q More than one?
A I don't think so.
Q What do you recall about that phone conversation?
A I believe Jamey Heath was on the call too. I don't think there was ever a one-on-one call.
Q Okay. What do you recall about that conversation?
A I recall telling them both I felt uncomfortable being asked to email a reporter directly when I was in the middle of -- I was going through a lot. And I remember Jamey being also effusive about -- and -- and saying that -- and agreeing that we should. I wanted to, but I just wasn't -- it was just an uncomfortable position to be in because she was my publicist and she was

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asking me to make a statement for her. And I just remember feeling weird about it.
I remember Jen saying how much it would mean to Stephanie if I did it. And also, I remember Jen kind of acting more like a publicist in the situation and saying, and yet, if you're not comfortable, you don't have to, but she would really much -- she would really appreciate it if you did.
So Jen was kind of serving as -- as like the -- as my publicist in that moment because Stephanie, in that moment, was kind of reaching out outside of a publicist, more, like, hey, I'm in crisis; I need help.
And then ultimately, I decided to do it for her.
Q So you expressed to Jen Abel that this made you a little bit uncomfortable?
A Jamey Heath and Jen Abel -- Jen Abel. Yeah.
Q But you never expressed that directly to Stephanie Jones, did you?
A No, I didn't.
Q And Jen Abel told you on the call, if you don't want to do this, you don't have to, in sum or substance, right?

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A No, she said only do what you're comfortable with, basically. Again, I don't remember the exact words, but she was leaning more towards, it would be really helpful for Stephanie. And also, I think she understood that somebody needed to say to me, like, don't feel pressured. Like, there's other people also giving statements.
Q You understood that there were other clients giving statements in support of Stephanie Jones for that article?
A Stephanie texted me that others were.
Q Okay. Did your statement ultimately appear in the Business Insider article?
A I -- as I said, I never read it. I don't know.
Q Did there come a time when Jen Abel suggested to you or Jamey Heath that you should withdraw your statement from Katie Warren?
A Not that I recall.
Q You were never told that there came a time where Jen Abel suggested to Jamey Heath that you should pull back the statement that you sent to Katie Warren?
A I have no memory of that.
Q Is that something that you would have

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expected Jamey Heath to tell you at the time?
MS. SHAPIRO: Objection.
THE WITNESS: If that happened, I would assumed he would.
BY MS. SHAH:
Q But you have no memory of ever being told that?
A No, almost the opposite.
Q Do you know if a decision was ever made by Jamey Heath to keep the statement or to withdraw it?
MS. SHAPIRO: Objection.
THE WITNESS: No, I sent the statement, so I assumed it ended up in the article or it didn't. I don't know.
BY MS. SHAH:
Q Okay. If Jen Abel thought at any point in time that maybe you should withdraw the statement that you sent, would you have expected her to raise that directly with you?
MS. SHAPIRO: Objection.
THE WITNESS: Thinking about that period, no. Jamey was -- Jamey was handling a lot of conversations. I was -- I was -- I think I was finishing -- I don't remember what month this was,

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but I imagine I was finishing or working on the movie, and I oftentimes didn't want to be a part of most conversations.
BY MS. SHAH:
Q Did you generally defer to Jamey Heath to make decisions like this?
A Yes.
Q Did you generally defer to him --
A I'm sorry. I need to go back.
Decisions like what?
Q For example, like whether or not you should pull a statement in support of Stephanie Jones that you had already sent to a reporter?
MS. SHAPIRO: Objection.
THE WITNESS: Like I said, I wasn't aware of any -- of that. I wasn't aware that I was ever going to pull a statement.
BY MS. SHAH:
Q Okay. Did you generally defer to Jamey Heath to make decisions around an interface with publicity matters with your publicity team?
A Yeah. Yes.
Q Okay. In the period around July, August, September of 2024 when there was quite a bit of

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press activity around you and the film, did you generally defer to Jamey Heath to handle that with your publicist without you?
MS. SHAPIRO: Objection.
THE WITNESS: I think everybody knew at that time that I was going through a lot and that I trusted Jamey to always do what was right. And -- and so, yeah, I don't think -- I don't think people were coming directly to me at that time for anything.
BY MS. SHAH:
Q Do you think it's important to be personally involved in decisions like that?
MS. SHAPIRO: Objection.
THE WITNESS: Decisions like what?
BY MS. SHAH:
Q Like what is happening around the publicity of what you might term a crisis in connection with your making of It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: Well, I -- I remember being involved. I don't think I said I wasn't involved.
BY MS. SHAH:
Q Do you remember --
A If I did, then I misspoke.

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Q Do you remember making decisions in connection with that?
MS. SHAPIRO: Objection.
THE WITNESS: I think you'd need to be more specific on what decisions are.
BY MS. SHAH:
Q Any decisions. Did you feel like a decision-maker or did you feel like someone else was a decision-maker?
MS. SHAPIRO: Objection.
THE WITNESS: I can't remember many decisions needing to be made at that time. But I know I was doing press in a very difficult period. So I think that there were definitely things that -- that related to maybe business or high-level things that I wasn't involved with, nor did I want to be.
BY MS. SHAH:
Q Do you think it would have been weird to retract a statement of support that you had previously sent to a reporter?
MS. SHAPIRO: Objection.
THE WITNESS: I think "weird" is a -- do you want to maybe ask me with a different word?
BY MS. SHAH:
Q Would you have been surprised to learn

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that Jen Abel asked Jamey to retract the statement of support that you sent for Stephanie Jones to the Business Insider reporter?
A I would be surprised because I don't think or know if she did.
MS. SHAH: Can you pull tab 55, please?
We're going to mark as Exhibit 4 a text conversation between Jen Abel and Jamey Heath, dated August 9th, 2024, that bears the Bates stamp JONESWORKS_, several zeroes, 16169.
(Exhibit 4 marked for identification.)
BY MS. SHAH:
Q Can you read through this for me, please?
A Okay.
Q Have you ever seen this before?
A I have not.
Q Were you aware, before you just looked at this, that this conversation took place?
A Nope.
Q Do you recall events surrounding a Daily Mail article that was published on the topic of tensions between you and Blake Lively on August 8th, 2024?
A I don't remember the specifics of it, but I definitely remember there were articles coming out

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at that time.
Q And do you remember the whole -- do you remember a big issue around whether or not Stephanie Jones had ever spoken to the Daily Mail around that time?
A August?
Q Eighth.
A Yes, I do.
Q Okay. You see here that Jen texts Jamey a Daily Mail article that says, at least in this version of the web link:
It-ends-Blake-Lively-Justin-Baldoni-Feud," right?
A That is what it says.
Q Okay. And this is right around the time the articles started appearing in the Daily Mail that were kind of first publicizing this alleged feud in traditional media, right?
A I don't know, but I will take your word for it. I don't know if Daily Mail was the first or -- I just -- yeah, I remember there was a lot of things happening during that period.
Q And that was a big deal, right, when -- when the press started picking up this alleged feud between you and Blake?
A Yeah.

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Q It was the reason you bright on -- brought on crisis communications?
A Because -- can you -- can you ask that question again?
Q Because the press had started picking up and reporting on an alleged feud between you and Blake?
A Because press was talking about it, yeah, and it was becoming a -- it was becoming a public crisis.
Q Okay. And then right after Jen sends Jamey that article, she says:
(As read):
"Just thought about something. Should I try to get Justin's letter removed from Business Insider?"
Do you see that?
A I do.
Q Okay.
(As read):
"I would need to tell her on background that both Justin and Wayfarer have severed ties."
Do you see that?
A I do.

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Q Had Justin and Wayfarer severed ties with Jonesworks at this point?
A I have no idea. On August 9th, I don't know.
Q Do you have any idea why Jen Abel would be suggesting to Jamey that you leak on background that Justin and Wayfarer have severed ties with Jonesworks?
MS. SHAPIRO: Objection.
THE WITNESS: I remember Jamey sending a text message that I -- that he just told me about to Stephanie, basically saying stop, stop. Don't make any phone calls. And that if she continued, that we would be leaving. But I don't remember the date of that. I don't remember where this is in that timeline. I would need to see. So I don't know if, at this point, he had already told her that we were leaving or -- yeah. I just don't know.
BY MS. SHAH:
Q Jen Abel still worked for Jonesworks at this point, right?
A To my knowledge, yes.
Q Was Jen Abel read in on the issue of Wayfarer and you severing ties with Jonesworks by this point?

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MS. SHAPIRO: Objection.
THE WITNESS: Can you say that again?
BY MS. SHAH:
Q Was Jen Abel read in on the issue of you and Wayfarer potentially severing ties with Jonesworks by this point?
MS. SHAPIRO: Objection.
THE WITNESS: By read in?
BY MS. SHAH:
Q Was she aware of it?
A Was she aware of it? I -- I wasn't privy to any of those conversations, so I don't know.
Q Okay. Jen Abel goes on to say:
(As read):
"Not -- "so not sure if your lawyers would recommend that as she would need to print that and not sure if that would cause any issues."
Do you see that?
A I do.
Q Do you have any idea what that's about?
A I'm -- I shouldn't assume, but I imagine it's our lawyers at Wayfarer Studios, our business affairs. But...
Q Why would it cause issues if a reporter

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were to print that Wayfarer and you had severed ties with Jonesworks at this point?
A I can't speculate. I'm -- again, I'm not a part of any of this.
Q You see Jamey Heath writes "Grammy Award Winner" in quotes and then writes "Dummy."
Do you see that?
A Yes.
Q Is Jonesworks a Grammy award-winning publicist?
A I didn't know publicists could win Grammy's.
Q I didn't either, but I'm asking you.
A Jamey is a Grammy award winner, so -- and he always says "dummy." Like, that's his -- that's a joke. Like, he always -- we call each other dummy. So I think maybe -- I'm just guessing, he was quoting the way someone described him because he had won a Grammy at one point in a previous career.
Q Okay.
A But I -- but I don't know.
Q Okay.
A I wasn't on this text chain.
Q Do you know that -- did you know, at the time, that Jen Abel was speaking to Katie Warren,

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the reporter at Business Insider?
A I -- until you said Katie Warren, I didn't know even who she was, so no.
Q Well, you sent your statement in support of Steph to Katie Warren, right?
A Yeah, but I didn't know what her name was.
Q Okay. Did you have any knowledge around this time that Jen Abel was personally speaking to the reporters at Business Insider about the article that came out about Steph?
A No.
Q Okay. Did you have any knowledge at the time that Melissa Nathan was behind the article at Business Insider that came out about Steph?
MS. SHAPIRO: Objection.
THE WITNESS: What do you mean "behind"?
BY MS. SHAH:
Q Was a primary driving force between -- behind getting it published and its negative slant?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q Do you know that today?
MS. SHAPIRO: Objection.

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THE WITNESS: Are you telling me that?
BY MS. SHAH:
Q I'm asking you if you're aware of that?
A No.
Q Okay. Have you ever heard that before?
MS. SHAPIRO: Object --
THE WITNESS: That she's -- like, that she wrote the article?
BY MS. SHAH:
Q That she planted the article.
A No.
Q Because she was angry at Steph?
A I'm sorry. Melissa was angry at Steph?
Q Correct.
A So she -- so she planted the article?
Q Yes.
A No, I didn't know Melissa at this time.
Q At the time you hired Melissa, did you have any inkling that she was behind the negative article in Business Insider about Steph?
MS. SHAPIRO: Objection.
THE WITNESS: I just learned about it from you, so no.
BY MS. SHAH:
Q Okay. Is that something you would have

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wanted to know before you hired her?
MS. SHAPIRO: Objection.
THE WITNESS: Hold on. Would I have wanted to know that the PR person that I was hiring to handle a crisis had evidently, according to you -- not that I don't trust you, written an article about my, at the time current PR person? I would -- yeah. Yes. Yes.
BY MS. SHAH:
Q Okay.
A Sorry. That was a lot.
Q You listened in on part of Melissa Nathan's deposition, right?
A Parts.
Q Did you listen in on the part where she and I were discussing her participation in the Business Insider article against Steph?
A I believe I only listened in for the end of one of the days, and I don't believe it was with you. I don't. But to answer your question, no.
MS. SHAPIRO: Do you want to take a break?
THE WITNESS: In a couple of minutes, we can.
MS. SHAPIRO: Okay.

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THE WITNESS: You've been holding it for long.
MS. SHAH: We can go ahead -- let me just ask one last question or two last questions and then we can go ahead and take a lunch break.
THE WITNESS: Sure.
BY MS. SHAH:
Q You said you recalled a point in time when an issue arose about Stephanie Jones potentially contacting the Daily Mail in this early August time period and that causing a big issue, right?
MS. SHAPIRO: Objection.
THE WITNESS: I remember that. I remember -- yes. Yes.
BY MS. SHAH:
Q Okay. Up until that point in time, did you feel you still had a friendly relationship with Stephanie Jones?
A Friendly, yeah.
Q Up until that point in time, did you have any reason to take any issue with anything that Stephanie Jones had done or was doing on your behalf?
MS. SHAPIRO: Objection.

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THE WITNESS: Yeah. Yes.
BY MS. SHAH:
Q What?
A I remember feeling, specifically as it related to the Business Insider article, the phone calls I had with her, I remember feeling like she wasn't personally -- my personal, not as an expert or anything like that -- I just remember feeling personally like she seemed off and maybe wasn't of sound mind.
Q What do you mean when you say "wasn't of sound mind"?
A I remember feeling that she was more worried about her own reputation than what I believe to be her work as a publicist in, I would say, taking care of ours.
Q Do you think there is something unsound of mind to be worried about your own reputation as a publicist more than your client's reputations?
MS. SHAPIRO: Objection.
THE WITNESS: No. It was more -- in the conversations I had with her, she felt different than previous conversations. Her speech, at times, was a bit erratic. She was, like, bouncing back and forth between things. Between -- it just felt like

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any person when you have a relationship with someone and they appeared different than they had the last few years of knowing them. That's what made me not sure.
BY MS. SHAH:
Q Not sure if she was of sound mind?
A Not sure if I felt -- let me put it this way. At that point in time, I was grateful that she was not the lead to represent me personally.
Q Who did you think was the lead to represent you personally?
A The person who had been for the last four years or so or three years.
Q Who was that?
A Jennifer Abel.
Q Okay. Do you think that in the time since these lawsuits were filed against you, that you had behaved to anyone differently than you did before?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MS. SHAH:
Q Do you think the stress of having this kind of public negative spotlight on you has caused that?

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MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MS. SHAH:
Q Do you find it distressing to have negative public articles being written about you?
A I do.
Q Are you aware of any smear websites or social media accounts that were being published about Stephanie Jones in 2024?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q You're not aware of that at all?
A No.
Q Okay. You are aware of a very negative --
A Sorry. Are you saying was I aware or am I aware?
Q Were you aware at the time?
A No. I mean, I am aware that there was a website that's become a whole --
Q Right.
A -- I think a part of this case, but I was not aware then.
Q Okay. You weren't aware at the time that

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you were having these conversations with Stephanie Jones where you have called into question her mental state, that she was dealing with websites and social media handles under the captions of things like "Stephanie Jones Leaks" and "Stephanie Jones Lies" that were peddling a bunch of defamatory, highly negative statements about her?
MS. SHAPIRO: Objection.
THE WITNESS: I wasn't aware of any of that.
BY MS. SHAH:
Q Okay. You were aware of a Business Insider article that was being written about her that was highly negative, right?
MS. SHAPIRO: Objection.
THE WITNESS: Again, I don't know what was in it or if it was highly negative. But I know that it upset her a lot.
BY MS. SHAH:
Q Okay. As someone who now yourself has experienced very negative public media attention, can you understand how her experiencing very negative, public, unwarranted media attention might have been distressing to her at that time?
MS. SHAPIRO: Objection.

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THE WITNESS: May I answer without a yes or a no?
BY MS. SHAH:
Q You can answer in whatever way you think is best.
A If I had a relationship with my doctor who was going to perform surgery on me for the last five years, and I went in to meet him before surgery and he started acting strange and then I found out that he was being attacked and he had a lot of personal drama, maybe he was going through a divorce, I wouldn't want him to operate on me because I'm paying him for his services.
So while I understand, especially the way you're phrasing it now, how emotionally disturbing it was for Stephanie, she was my publicist and I was paying her for her services. And for me, having been through what I've been through the last year, it's the reason why I wouldn't take on any jobs because I wouldn't be of sound mind to do my job to the best of my ability while dealing with that stress.
Q Are you of sound mind to do your job to the best of your ability to this date?
MS. SHAPIRO: Objection.

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THE WITNESS: I don't think I understand your question.
BY MS. SHAH:
Q You said you wouldn't be of sound mind to do your job to the best of your ability in the circumstances of what you've been through.
Do I understand that?
A Yes. We just need to define job, and then I can agree with you.
Q Well, I'm just using your words.
A Yeah, so job. So what I was meaning by "job" is if I'm being paid for services.
Q Okay. And that's the reason that you haven't taken on any jobs since this lawsuit has been pending?
MS. SHAPIRO: Objection.
THE WITNESS: No. There's not many jobs being offered to me at the moment.
BY MS. SHAH:
Q Do you feel you are of sound mind?
MS. SHAPIRO: Objection.
THE WITNESS: When?
BY MS. SHAH:
Q Now.
A I don't believe I'm doing a job. I'm

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just telling the truth. So yes, I do.
Q Did you ever express to Stephanie Jones at the time these sentiments that you're expressing to me now about her mental state or fitness to do her job for you as a publicist?
A It was my feeling that that would have been, in my opinion, unnecessary and would have caused her more pain.
Q Is that a "no"?
MS. SHAPIRO: Objection.
THE WITNESS: That is a "no."
BY MS. SHAH:
Q You didn't fire her at the time because of the sentiments that you're expressing to me now; is that right?
A I didn't personally fire her. No.
Q And Wayfarer did not fire her either as a result of the sentiments you're expressing to me now; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: No, because Jennifer Abel was our main point of contact, my publicist.
MS. SHAH: Okay. Thank you. We can take a lunch now.
THE VIDEOGRAPHER: We are going off the

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record. The time is 12:31 p.m.
(Lunch recess.)
THE VIDEOGRAPHER: We're back on the record. The time is 1:24 p.m.
BY MS. SHAH:
Q All right. There came a time when you and Wayfarer brought on Melissa Nathan and her firm, TAG, to help you with crisis communications; is that right?
A Yes.
Q How did you become to be introduced to Melissa Nathan?
A Me personally?
Q Yes.
A Do you mean specifically or the sequence of events or?
Q Describe for me the sequence of events that led to you coming to the idea to hire Melissa Nathan and then, ultimately, hiring Melissa Nathan.
A We decided to bring on someone for crisis PR. And Melissa Nathan was, I believe, one of the names that was presented.
Q When in time did you decide to bring on crisis PR?

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A I believe August of 2024.
Q Do you recall that it was around or before July 25th of 2024?
A That what?
Q That you decided to bring on crisis communications.
A I don't.
Q Okay. Any reason to dispute that?
MS. SHAPIRO: Objection.
THE WITNESS: If you have a document that might dispute it, I would be very open to seeing it. I just don't have the dates in my head.
BY MS. SHAH:
Q And what led you to the decision that you should or needed to bring on crisis communications at that point in time?
A That press was -- people were talking. Press was starting to ask questions; why I wasn't doing any marketing promotion of the film. By this point, I'd been told that I wasn't allowed to attend my own premiere. And I believe fans and press were starting to notice that I was absent and at that point, it became a public conversation. Which, I think to me and to us, felt like a crisis.
Q What about it felt like a crisis to you?

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A Well, I think not -- just the idea of not being allowed to go to my own premiere was -- was very hard. If I think about your question, crisis, to me, feels like another word for not good situation in the public.

So it was just, it wasn't for a -- I feel like regular PR is for run-of-the-mill everyday press. And then if there are situations that are not good, you hire a crisis PR person who specializes in that.

Q And what were you hiring Melissa Nathan and TAG as crisis PR people to do exactly?

A I didn't know much about crisis PR so I didn't really know at the time.

Q Do you have a better understanding now?

A Yes.

Q What is that understanding?

A To combat untrue negative stories with the truth.

Q When did you come to that understanding?

A After I met crisis PR.

Q Meaning Melissa Nathan?

A And the various people that worked with her.

Q At TAG?

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A Yes.

Q Okay. And when I say TAG, you understand that I'm referring to Melissa Nathan's PR agency, The Agency Group, right?

A Yes.

Q Okay. You said that Melissa Nathan or The Agency Group's names was one of the ones proposed to you as a potential crisis PR; is that right?

A Again, not proposed to me, but I believe -- I believe there were multiple that Jamey had met with.

Q Do you know if Jamey actually spoke to or met with any other than Melissa Nathan and her team?

A I'm not sure.

Q Do you have an understanding of what led Wayfarer and you to hire Melissa Nathan instead of any of the other recommended PRs?

A I believe I entrusted that to Jamey to help make the best decision for us.

Q Do you have an understanding from Jamey or otherwise in terms of why he decided to hire Melissa Nathan over other names that were recommended?

A I didn't ask very many questions at that

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time. But I believe he thought she was very good at her job.

Q Do you know what led him to believe that?

A I don't.

Q Did you have any personal role in making the decision to hire Melissa Nathan over any of the other crisis PRs that may have been recommended?

A No.

Q Are you aware of where Jamey got the names for potential crisis communications professionals that he was considering?

A I imagine from --

MS. SHAPIRO: Mr. Baldoni, don't speculate.

THE WITNESS: No. I actually don't.

BY MS. SHAH:

Q You don't know?

A No.

Q Do you know if he or anyone else at Wayfarer asked Stephanie Jones for her views on crisis communications professionals that you should hire?

A I don't.

Q Do you know if she recommended Melissa Nathan or not?

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A If Stephanie Jones recommended? I now know that she didn't.

Q How did you come to that understanding?

MS. SHAPIRO: Mr. Baldoni, don't answer --

THE WITNESS: No --

MS. SHAPIRO: -- if the information came from your lawyers.

THE WITNESS: Yes, I can answer this. Stephanie had sent me a text about Melissa Nathan.

BY MS. SHAH:

Q You knew at the time that Stephanie did not recommend that you hire Melissa Nathan, correct?

MS. SHAPIRO: Objection.

THE WITNESS: I knew that Stephanie did not like Melissa Nathan, yes.

BY MS. SHAH:

Q And Stephanie warned you against hiring Melissa Nathan; isn't that right?

A You could -- I think you could put it that way with my interaction with Stephanie. Yeah.

Q And were you aware that Stephanie also warned Jamey Heath and Tera Hanks against hiring Melissa Nathan?

A I was only aware of what she texted me.

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Q Jamey Heath and Tera Hanks never told you that Stephanie Jones had also warned them against hiring Melissa Nathan?
A Not that I recall.
Q Do you have an understanding as to why Stephanie Jones was warning you against hiring Melissa Nathan?
A I vaguely remember -- I think there was a text message that she sent that said she -- I'm reading it in my mind. There was something, there was a word "shady" in there and it was like a link to something that I never clicked on.
Q Other than the text message you're describing with Stephanie Jones, did you ever have a conversation with her about this issue, whether in person or on the phone?
A I don't know. I'm -- my memory of this time was that there was a lot of messages and it, like -- I might have spoken to Stephanie. I don't remember the conversation. But there was like a -- there was like a -- felt like a frantic energy from Stephanie.
Q Did you give any credence to the information that she was giving you in terms of why you should not hire Melissa Nathan to be aligned

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with you?
MS. SHAPIRO: Objection.
THE WITNESS: What do you mean by "credence" exactly?
BY MS. SHAH:
Q Did you take her concerns seriously?
A I believe I did.
Q Did you do anything to investigate them further before you hired Melissa Nathan?
A I didn't have any capacity at that time to do personal investigation, no.
Q Did you relay Stephanie's concerns to Jamey Heath or Tera Hanks at the time?
A I believe I did. Yes.
Q Tell me what you recall about the substance of those conversations or communications.
A I remember passing along that Stephanie doesn't like -- I didn't know who Melissa Nathan was -- one of the people. That's what I remember.
Q Do you remember Stephanie Jones telling you in sum or substance that Melissa Nathan and the tactics she uses as a crisis communications professional are not the kinds of tactics that you want to publicly associate yourself with?
A That sounds very familiar.

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Q Are you aware that Wayfarer and you decided to hire Melissa Nathan over Stephanie Jones' objections?
A I would imagine so, yes.
MS. SHAH: Okay. I'm going to show you what's marked as a document, Exhibit 5.
(Exhibit 5 marked for identification.)
BY MS. SHAH:
Q It's a text message between you and Stephanie Jones dated July 26, 2024, Bates stamped Jonesworks_, several zeroes, 39735.
Is this the text message that you were referring to that Stephanie Jones sent you where she warned you against hiring Melissa Nathan?
A It appears to be.
Q And this was sent on July 26th, 2024. So does this refresh your recollection that you were considering bringing on crisis PR before July 26th, 2024?
A Yes.
Q Okay. And as you recall, Stephanie Jones sent you a link at the top of the text thread, right?
A Yes.
Q You said you never clicked on that; is

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that right?
A Yes.
Q Why not?
A It felt -- it might sound silly but it felt like there was an agenda and it didn't feel -- yeah.
Q And so because it felt to you like she had an agenda, you didn't bother to look at what she was sending you?
MS. SHAPIRO: Objection.
THE WITNESS: I didn't say that.
BY MS. SHAH:
Q How would you say it?
A I was going through a lot in my life at this time and I didn't want to be in the middle or a part of anything like this. So I asked her to please communicate with Jamey and Tera, as they would be handling everything.
Q Do you think it's important for you as a public persona to take care in who you associate yourself with?
MS. SHAPIRO: Objection.
THE WITNESS: Yeah.
BY MS. SHAH:
Q Do you think it's important for you as a

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human being, personally, to take care in who you associate yourself with?
MS. SHAPIRO: Objection.
THE WITNESS: Yeah.
BY MS. SHAH:
Q Have you ever heard, either then or since that time, about the work that Melissa Nathan did as a crisis publicist with respect to a woman named Camilla Sterling, who was found dead in a hotel room that was rented under the name of Scooter Braun's associate, David Bolno?
MS. SHAPIRO: Objection.
THE WITNESS: Through this case in the last few weeks, yes.
BY MS. SHAH:
Q If you had clicked on the link that Stephanie Jones sent you at the time, it appears that you would have learned about it then, doesn't it?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know what was in the article. But if the article said something about crisis PR, then I'm assuming I would have learned.

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BY MS. SHAH:
Q You can see from the link that she sent, it says "Singer Camilla Sterling died, David Bolno hotel room."
Can you see that?
A Yes.
Q Okay. What have you come to learn since then about the work that Melissa Nathan did in connection with the Camilla Sterling incident?
A Oh, I haven't learned anything. I know what's, I think, being accused of. But I don't actually know anything that Melissa did or didn't do.
Q You never talked to Melissa about this?
A No.
Q Still haven't?
A No.
Q Okay. You will see at the bottom of the text that Stephanie says:
(As read):
"This is the kind of mess Melissa Nathan (crisis PR) lies and cleans up. Bolno works for Scooter and it was a nightmare. Lies. Dirty work."

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You see that?
A I do.
Q Did you ever ask her what she meant by that?
A I don't believe I did.
Q She then writes:
(As read):
"I'm also don't want Blake's team to align you with people like this Melissa works with."
Do you see that?
A I do.
Q Did you ever ask her what she meant by that?
A I did not.
Q Were you aware at the time that Melissa works with people like Jed Wallace?
MS. SHAPIRO: Objection.
THE WITNESS: I had no idea who Jed Wallace was.
BY MS. SHAH:
Q Okay. So you don't know whether or not that's what Stephanie Jones was also trying to warn you about, right?
MR. GLOVER: Objection. Form.

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THE WITNESS: I don't know, no. I don't know.
BY MS. SHAH:
Q Because you never asked her what she meant by that?
MS. SHAPIRO: Objection.
THE WITNESS: Unless you have a document that says I did, I don't feel like I did.
MS. SHAH: Okay. I'm going to show you a document that's been marked Exhibit 6.
(Exhibit 6 marked for identification.)
THE WITNESS: You got it.
BY MS. SHAH:
Q It's a text message between Stephanie Jones, Jamey Heath, Tera Hanks, and you --
A Uh-huh.
Q -- dated July 26th, Bates stamped Jonesworks_JB_, several zeroes, 1142.
Do you see this?
A Yes.
Q Okay. Do you recall this text message when you received it?
A Vaguely, yes.
Q Okay. And in this text message, Stephanie Jones warns you, Tera Hanks, and

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Jamey Heath that you should not work with Melissa Nathan because "there's a lot of dirty work she has done" and "it's not someone that you should want in Justin's orb."

Do you see that?

A Yes.

Q Okay. And she goes on to say:

(As read):

"Or for Blake's PR to use as a weapon against him."

Do you see that?

A I do.

Q Did you ever have a conversation with her about what she meant by that?

A I did not have a conversation with Stephanie at all around this.

Q Okay. Do you have any understanding, whether from this text message or anything else that you knew at the time, about what she meant when she said, "I just downloaded Tera on some dark stuff"?

A I don't.

Q Did Tera ever relay the substance of that conversation to you?

A I think I had had a conversation with Tera and Jamey that I didn't want to be a part of

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any of this. So I trusted them to make the decision. I don't believe she told me anything.

Q Okay. Do you understand from this text message that Stephanie is telling you and Jamey and Tera that it might not be good for you to be associated with someone like Melissa Nathan based on the type of tactics that she has used in the past?

A That seems to be an accurate summary.

Q And that if people knew that you were associated with Melissa Nathan or specifically if Blake's PR came to find out that you had associated yourself with Melissa Nathan, they could use that against you because of who Melissa Nathan was, right?

MS. SHAPIRO: Objection. Objection.

THE WITNESS: I can't speculate to what she meant by that. But it seems to be she says "Blake's PR to use as a weapon" so...

BY MS. SHAH:

Q Okay. Now, Wayfarer and you --

A are you done with this one?

Q I think so.

A Here you go.

Q Wayfarer and you went ahead and hired Melissa Nathan after and despite Stephanie Jones's

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warnings, right?

MS. SHAPIRO: Objection.

THE WITNESS: I believe so.

BY MS. SHAH:

Q And there came a time in August, after you had hired Melissa Nathan, that The Hollywood Reporter published an article about the fact that you had hired Melissa Nathan, right?

A Yes.

Q I'm going to show you that article.

MS. SHAH: It's a document we're going to mark as Exhibit 7.

(Exhibit 7 marked for identification.)

THE WITNESS: Thank you.

BY MS. SHAH:

Q It's an article from The Hollywood Reporter, dated August 14th, 2024, that says "Justin Baldoni Hires Crisis PR Veteran Amid It Ends with Us Rift."

Do you see that?

A Uh-huh.

Q And it goes on to say:

(As read):

"The director and star has retained the services of Melissa Nathan who

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represented Johnny Depp during the Amber Heard trial."

Do you see that?

A Excuse me. On the second page, yes.

Q Okay. You were pretty upset when this article came out, right?

A I don't remember what I was feeling.

Q You were worried when this article came out that being publicly associated with Melissa Nathan might make it look like you had something to be guilty for, right?

MS. SHAPIRO: Objection.

THE WITNESS: No, I think -- I think I was just not happy that my crisis PR was being publicized. I don't think it had anything to do with Nathan -- Melissa Nathan.

BY MS. SHAH:

Q Why were you not happy that your crisis PR was publicized?

A Because it felt like more of the -- kind of -- the kind of thing that felt like somebody would plant to draw more attention and fan a flame to something.

Q Fan a flame to what?

A To public speculation, the fan theories

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of why I wasn't doing press with anybody and...
Q What were the fan theories at the time about why you weren't doing press with anyone?
A I remember there being a lot of talk about all of the cast unfollowing me, why I wasn't doing press with any of the other cast members. I don't remember the date that this came out, but I don't know if I had already done the premiere or not at this point. But I had also never read an article or seen an article about somebody hiring crisis PR, so I found it odd.
Q And you thought it made you look bad, right?
A Yeah, I think I did.
Q You thought it made you look like you had something to hide?
A I think I had never been involved in anything like this, and I wasn't used to seeing my name in the press in this way at all. And I certainly -- I certainly didn't want my -- my name out there in a negative way.
Q You thought it made it look like you had something to hide that had to do with the allegations of on-set abuse, right?
MS. SHAPIRO: Objection.

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THE WITNESS: I'm unaware of any allegations of on-set abuse.
BY MS. SHAH:
Q To this day, you're unaware of any allegations against you of on-set abuse?
MS. SHAPIRO: Objection.
THE WITNESS: Abuse? I'm aware of allegations as were written in the New York Times article and in this lawsuit. Yeah.
BY MS. SHAH:
Q What do you understand those allegations to be?
A I understand that I have been alleged to sexually harass Mrs. Lively. And then that I have alleged to have launched a retaliation smear campaign.
Q Do you recall articles coming out around this time that called your on-set behavior abusive?
MS. SHAPIRO: Objection.
THE WITNESS: I believe I do.
BY MS. SHAH:
Q Okay. So you understand that that was one of the fan theories that was floating around about why you weren't involved in publicity and why all the cast had unfollowed you, right?

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MS. SHAPIRO: Objection.
THE WITNESS: Not necessarily.
BY MS. SHAH:
Q Well, yes or no?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q You're not aware of any fan theories at the time that one of the reasons that the cast unfollowed you and that you were not involved in a lot of the marketing of the film or publicity around the film was because you engaged in abusive or toxic behavior on set?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not aware those were fan theories, no.
BY MS. SHAH:
Q Any theories?
MS. SHAPIRO: Objection.
THE WITNESS: I'm aware that there were leaks to press that accused me of that, but I'm not aware of fan theories.
MS. SHAH: Okay. Thirty-nine, please.
(Exhibit 8 marked for identification.)

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BY MS. SHAH:
Q I'm going to hand you a document that's marked as Exhibit 8. It's a text thread between Henny Grace, Melissa Nathan, you. I think that's it.
A Uh-huh.
Q On August 14th, Bates-stamped NATHAN_, several zeros, 3972.
Do you see that?
A I do.
Q Who is Henny Grace?
A That used to be my alias, but it's now become public, so...
Q No longer useful as an alias. All right.
So this is a text thread between you and Melissa Nathan; is that right?
A It appears to be, yes.
Q On August 14th, which is the day after The Hollywood Reporter article that we just looked at was published.
Do you see that?
A Yes.
Q Okay. And halfway down the page, at 8:03 a.m., you write:
(As read):

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"Talk to me about this - so I'm really frustrated about this crisis PR leak - and framing it as Johnny Depp's firm to poise that I have something to hide and also there was abuse."

Do you see that?

A Uh-huh.

Q And so you were concerned about The Hollywood Reporter article framing it specifically with relation to Melissa Nathan's prior association with Johnny Depp that it might mean that you had something to hide and that there was abuse on set, right?

MS. SHAPIRO: Objection.

THE WITNESS: Yes, actually. Yes.

BY MS. SHAH:

Q Okay. And then you say:

(As read):

"I don't understand how we are letting her continue to leak stories and do this to us."

Do you see that?

A Yes.

Q Who is "her"?

A I presume I meant Ms. Lively's team.

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Q Okay. And then you ask Melissa Nathan to walk you through it. And then I want you to read Melissa Nathan's response on the next page.

A Do you want me to keep reading past page 2?

Q No, you don't need to.

A Okay.

Q So she tells you at the top:

(As read):

"Sure-firstly I am also incredibly frustrated."

Do you see that?

A I do.

Q Then she goes on to say:

(As read):

"A PR should never be part of a story but- I also work with many people who are in trouble and protect them."

Do you see that?

A Uh-huh.

Q Was it your understanding from this text message or any other conversation you had with her about this topic, that she was also frustrated by the publication of The Hollywood Reporter article?

A I'm reading that here now so it appears

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she was frustrated.

Q Do you remember conveying -- her conveying to you that she was frustrated by it?

A I -- just here. I don't remember outside of this. I -- I was on a plane at the time, so we didn't speak.

Q Okay. Did you speak to her outside of this text message about The Hollywood Reporter article?

A I don't know.

Q Do you recall any phone or in-person conversations with her about The Hollywood Reporter article?

A Definitely not in person. I don't -- I don't remember any phone calls about it. I feel like -- I feel like this was me venting. So this was probably the conversation that we had.

Q Okay. And you're essentially asking her, like, tell me why this isn't a bad look for me, right?

MS. SHAPIRO: Objection.

THE WITNESS: I think I'm trying to understand all of this. I oftentimes reach out to my team to say, help me understand this, I have a feeling about something. I don't like this. Make

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me feel better about it. What does this mean? What -- what is this? And I'm not -- I'm not a PR expert.

BY MS. SHAH:

Q And would you agree with me that she did try to make you feel better about it?

A It -- it appears that she did try.

Q She's essentially saying, this is not a huge deal, it doesn't look terrible for you, right?

A Yeah. She's saying it's very normal. But that people have crisis PR, but it seems to me that she also said that it's not normal for PR to be part of a story. So...

Q And if you look down to the fourth paragraph, starting "Jen knows."

Do you see that?

A "Jen knows," yes.

Q She said:

(As read):

"Jen knows - I spoke for an hour on the phone from 12-1 a.m. my time she swears she had nothing to do with it but I know someone placed this."

Do you see that?

A I do.

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Q Did you have a suspicion that Jen Abel had placed this?
A No.
Q Did you have a suspicion that Stephanie Jones had placed this?
A I had a suspicion that this was Blake's team placing this.
Q Did you have a suspicion that Melissa Nathan had placed this?
A No.
Q And here, she's essentially communicating to you, I'm frustrated by this, someone placed this, it wasn't me, right?
A I think maybe when I first reached out to her, I may have -- I may have been confused and wondered why my team might place this or if it was a leak. I don't really remember. I just remember it being such a weird headline. But no, I never suspected that Jen placed it.
Q Did you ever suspect that Melissa placed it?
A Not in a negative way. I think if I reached out, I was confirming that no one from my team would brag about me having crisis PR. I didn't think that was something worth bragging or making an

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announcement about.
Q Did you get confirmation from your team or comfort from your team that no one from your team had leaked this information?
A I believe I did. I believe this is part of that.
Q This message that Melissa is writing to you is part of the confirmation that you were getting that your team didn't have any part in leaking this information, right?
A I believe so.
Q Okay. And then she goes on to say:
(As read):
"It doesn't make you look bad."
Do you see that?
A Yes.
Q You understood from this that she was trying to reassure you that this wasn't a bad look for you, right?
A I imagine that's what she was doing.
Q Okay. And then she said:
(As read):
"All the reporters like and trust me, which is why when they called me, they took out all the social media stuff and

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did a straight story as they wouldn't kill it."
Do you see that?
A I do.
Q Do you have any understanding of what she meant by "they took out all the social media stuff"?
A No, because even just reading it a second ago, I think I missed that too. Sometimes my reading comprehension isn't great. No, I have "all the reporters like and trust me, which is why they called me." I have no idea what she's talking about.
Q Did you have an understanding, as of this time, that she had spoken to reporters at THR or about this article?
A No.
Q Did you have any understanding about, at the time, that she had tried to influence the article or kill it?
A No, I think I missed that completely.
Q Okay. Is this the type of negative association with Melissa Nathan and her past clients and tactics that you think Steph was warning you about before she hired you -- before you hired Melissa?

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MS. SHAPIRO: Objection.
THE WITNESS: I can't speculate to what she was worried or warning me about.
BY MS. SHAH:
Q Because you never spoke to her about it yourself?
A Yeah, I never did.
Q Okay. Did Melissa Nathan ever tell you that she, in fact, was responsible for the leak that culminated in this story?
A She never did.
Q Did she ever tell you that she was lying to you when she thought -- when she told you that she was incredibly frustrated by this?
MS. SHAPIRO: Objection.
THE WITNESS: She did not.
BY MS. SHAH:
Q Did she ever tell you when she said "I know someone placed this," that she actually knew who had placed it?
A She, obviously, did not.
Q Did she ever tell you that it was one of her friends?
A Like before, she didn't tell me anything except what I see here.

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Q Okay. If those things were true, are those things you would have wanted her to tell you at the time when you reached out to ask about it?
MS. SHAPIRO: Objection.
THE WITNESS: I would imagine so, yes.
BY MS. SHAH:
Q Okay.
MS. SHAH: I'm going to show you -- pull tab 40, please.
THE WITNESS: Do you want me to hold onto this?
MS. SHAH: You don't have to.
I'm going to mark this as Exhibit 9.
(Exhibit 9 marked for identification.)
THE WITNESS: Thanks.
BY MS. SHAH:
Q It's a text thread between you, Melissa Nathan, and Jen Abel, also dated August 14th, 2024, Bates-stamped NATHAN_,several zeroes, 4552.
A Uh-huh.
Q Turn for me to page that's stamped at the bottom 4554, please.
A Can I just read before then, too?
Q Sure.

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A What was the page you wanted me to look at?
Q 4554. It's the page you're on.
A Uh-huh.
Okay.
Q Okay. So you're sending a screenshot to Jen and Melissa of a text that your old assistant, Will, sent to you, right?
A Yes.
Q Did you read the text?
A I did.
Q And in that text, he's essentially expressing to you that it's a bad look for you what came out in The Hollywood Reporter story, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MS. SHAH:
Q Okay. And you were passing that along to Jen and Melissa to, what, seek their feedback on that text?
A I don't remember why I sent it. I just remember it didn't feel good.
Q Why didn't it feel good?
A Who's on this text, by the way? Oh, it's Melissa.

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I mean, I'm being talked about in public and that sucks. And he's telling me that he thinks that it looks like I'm trying to cover something up. And he wants to just share with me because he knows my heart and I -- you know, and I didn't want people to think that because it wasn't true.
Q And isn't this kind of association exactly what Stephanie Jones was warning you about when she advised you not to hire Melissa Nathan?
MS. SHAPIRO: Objection.
THE WITNESS: Again, I don't know what Stephanie Jones was exactly referring to so I can't answer that.
BY MS. SHAH:
Q You understood that she had said to you that being associated with a crisis communications professional like Melissa Nathan could be used against you because of that association, right?
A I remember it at one of the texts you showed me.
Q And here -- here is at least one independent source expressing that same view to you now, right?
A Yes.
Q Okay. Were you bothered by this?

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MS. SHAPIRO: Objection.
THE WITNESS: I think I was.
BY MS. SHAH:
Q Okay. Can you think of another example of a director of a film hiring crisis PR during the promotion and release of the film related to the promotion and release of the film?
A I don't -- I can't think of an article where anyone who hires crisis PR publicizes it.
Q My question was: Can you think of a single example of a director who hired crisis PR during the promotion and release of a film?
MS. SHAPIRO: Objection.
BY MS. SHAH:
Q In your industry?
A Do you mean that I know of a director who hired crisis PR, or that I read an article of a director who hired crises PR?
Q Either one. Can you think of any other example that you can think of where a director of a film hired crisis PR during the promotion and release of that film?
A A director of a film hired crisis PR. As I sit here right now, I can't think of a director that I would know that hired crisis PR.

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Q Okay. Pretty unique situation in the industry as far as you're aware?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sorry. What was the question?
BY MS. SHAH:
Q Is that a pretty unique situation in your industry as far as you're aware?
A For what?
Q That a director would hire a crisis PR in connection with the promotion and release of a film he was directing or she was directing?
A I don't know. Because I don't think normally people find out when people hire crisis PR.
Q But you can't think of a single other example?
A I can't right now. No.
Q Okay.
MS. SHAH: Tab 83, please.
THE WITNESS: Done with this one?
BY MS. SHAH:
Q Actually, let's look at it for a second more. Just flip forward to the pages ahead of what we were just talking about, from the beginning of the text thread. The pages ahead. Sorry.

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MS. SHAPIRO: What is the Bates number?
MS. SHAH: Start at the beginning of the document 4552.
THE WITNESS: Okay.
BY MS. SHAH:
Q And through 4553.
Am I correct that you and Jen and Melissa are talking about, generally speaking, what is going on with publicity around you and the film and this issue and how to handle it?
MS. SHAPIRO: Objection.
THE WITNESS: I think there were more articles coming out that she was sharing and giving me context about. And here, we're talking about the trainer and my back. That's from what I see.
BY MS. SHAH:
Q Okay. At the -- on the first page, the first text, you wrote:
(As read):
"Just woke up, texting Jennifer. With all the texts I'm getting worried about me. I imagine this truce didn't last?"
Do you see that?
A Uh-huh.
Q Do you recall getting texts that morning

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or the day before that were concerned about you?
A I remember going to sleep. I don't know if I was on a plane or where -- I don't remember where I was. But there were a lot of people asking if I was okay.
Q And they were asking if you were okay because they had read The Hollywood Reporter article about you hiring Johnny Depp's crisis publicist, right?
A I don't know what they were -- what they had read. I don't know how many articles there were. But I know that people were worried about me.
Q Was it your understanding that that was, at least in part, generated from The Hollywood Reporter article or you think it was just a coincidence and out of the blue?
MS. SHAPIRO: Objection.
THE WITNESS: I had no idea what it was about. That's why I think that's why I was texting Jennifer. And I make reference to a truce between the two PR teams.
BY MS. SHAH:
Q And what did you understand about that truce?
A That they would not be planting any

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negative or untrue stories and that we would not be talking to any media.
Q Okay. And you understood that that's a truce that had been made between Melissa Nathan and Leslie Sloane; is that right?
A That's what was told to me.
Q Okay. And you understood as of this time that both Melissa Nathan and the TAG team and Jennifer Abel and the Jonesworks team were interfacing with reporters about the incoming or published stories that were happening around the film and you; is that right?
A I'm sorry. Can you repeat that one more time?
Q Sure. I'm trying to get a sense of what you understood the TAG team and Melissa Nathan and Jennifer Abel to be doing around this time vis-a-vis publicity. You understood that Melissa Nathan had reached out to Leslie Sloane and formed some sort of truce; is that right?
A Yes.
Q Okay. You understood that Melissa Nathan was monitoring and handling any incoming PR inquiries; is that right?
A I think I had believed that both her and

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Jen were doing that.
Q Okay. You understood that Melissa Nathan was interfacing with reporters as necessary on any of these stories, right?
A Interfacing, like -- communicating with?
(Cross talk.)
Q Communicating with? Sure.
A Yeah. Yeah. My understanding was that if someone reached out to her, then she would obviously answer that or communicate with them in whatever way a PR person communicates.
Q And by "someone," you meant a reporter?
A I would imagine.
Q And by "she", you meant Melissa Nathan?
A Or Jennifer Abel.
Q Okay. Did you understand that Melissa Nathan and/or Jennifer Abel were actually speaking to reporters whether on background or otherwise around this time?
A In what capacity?
Q On your behalf.
A Well, I imagine so. There was a -- we were still promoting the movie so...
Q And you understood that both Melissa Nathan and Jennifer Abel were speaking to

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reporters on your behalf at this time?
A I'm not sure if I ever thought about who was speaking to who.
Q Okay.
A Did you want me to finish -- was there something I didn't answer?
Q No.
A Okay.
Q Were you finished with your answer?
A I believe so.
MS. SHAH: Okay. Eighty-three, please.
THE WITNESS: Now we're done with this?
BY MS. SHAH:
Q Fair to say that you did not view The Hollywood Reporter article as a positive for you when it came out?
A I think that's fair to say.
Q Fair to say you would have been pretty pissed if you had learned that Melissa Nathan had, in fact, leaked the information that resulted in that article, right?
MS. SHAPIRO: Objection.
THE WITNESS: I can't imagine I would have been happy about that.

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MS. SHAH: All right. I'm going to show you what's been marked as Exhibit 10. It's a text thread between Melissa Nathan, Ashlea, and Amy Chozick dated August 13th, 2024, Bates stamped Nathan_, several zeroes, 1221. Flip through this for me and tell me if you've ever seen this before.
(Exhibit 10 marked for identification.)
THE WITNESS: No, I have never seen this. I don't have to flip through it.
BY MS. SHAH:
Q Sorry. I gave you the wrong one.
Do you know who Amy Chozick is?
A I do not.
Q Do you know if she's a reporter?
A I do not.
Q Okay. Do you know who Ashlea is?
A I do not.
Q Do you know if she's one of Melissa Nathan's good friends?
A I do not.
Q Okay. On the first page of this, there's a text from Amy Chozick and then a text from Melissa Nathan that says:
(As read):
"I am on Zoom but we need to pin Amy

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threw me to the wolves."
Do you see that?
A Uh-huh.
Q And then Amy says:
(As read):
"I didn't know that Josh would put it on the wires."
Do you see that?
A I do.
Q And then Amy says:
(As read):
"My money is on Melissa against the wolves anyway."
Do you see that?
A I do.
Q Then Melissa says:
"Stop sucking up."
And then Amy says:
"I should be your publicist. Hire me."
Do you see that?
A I do.
Q And Melissa says:
"Done. 0.00 per year."
Do you see that?
A I do.

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Q Now, this text thread is on the same day as The Hollywood Reporter article was published.
MS. SHAPIRO: Is that a question?
MS. SHAH: No.
BY MS. SHAH:
Q Are you aware of whether or not they're talking about The Hollywood Reporter article that named Melissa as your crisis PR?
MS. SHAPIRO: Objection. He just said that he's never seen this before.
THE WITNESS: I've never --
MS. SHAPIRO: Can you move to something that he actually has knowledge of?
MS. SHAH: No. I'm going to ask him the questions I'm going to ask him.
THE WITNESS: Is it okay if I read the document?
MS. SHAH: Of course.
THE WITNESS: Okay. I've read it.
BY MS. SHAH:
Q Do you now understand that they were joking about The Hollywood Reporter article that identified Melissa as your crisis PR?
MS. SHAPIRO: Objection.
THE WITNESS: It appears to be the case.

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BY MS. SHAH:
Q Okay. Flip with me to the page marked 1222 at the bottom.
A Okay.
Q Do you see where Amy Chozick at around 7:40 says:
(As read):
"I told our friend Josh that Melissa is a boss and has a cool client. Josh told his wife who is a very prominent publicist. Sarah somehow told The Hollywood Reporter and now they are doing a story on Mel."
Do you see that?
A I do.
Q You understand this is how The Hollywood Reporter got that story?
A It appears that is what Amy is saying.
Q Flip the page to 1223. You see a screenshot texted by Melissa of a conversation between her and Pam. Do you see that?
A I do.
Q You don't need to flip back to the article. But I'll represent to you that Pam is Pam McClintock who wrote The Hollywood Reporter story on

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Melissa.
A Okay.
Q Okay. And you see they're texting.
(As read):
"Good to chat."
Melissa says:
"Just checking in to see if I need to look out for this article and if so, when."
And then Pam says:
"Was just texting you. Story is very fair and going soon."
Melissa says:
"Thank you."
Do you see that?
A Yes.
Q Were you aware that Melissa had spoken on background with The Hollywood Reporter ahead of the story being published?
A I was not.
Q Were you aware that she was managing coverage in The Hollywood Reporter story about her before the story was being published?
A I was not.
Q Amy Chozick writes:

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"Perfect."
Do you see that?
A Oh, sorry, down here. Yes.
Q And if you flip the page, they are talking about:
(As read):
"What publication?"
"THR."
"Ooh exciting."
"I think so!"
Do you see that?
A Yes.
Q Were you aware that Melissa and her friends were boasting and joking about how good this article was going to be for Melissa at the time?
MS. SHAPIRO: Objection.
THE WITNESS: I wasn't aware of this, so no.
BY MS. SHAH:
Q Because Melissa never told you any of this, did she?
MS. SHAPIRO: Objection.
THE WITNESS: I think I testified to what Melissa told me earlier. Which was not this. So...

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BY MS. SHAH:
Q Okay. If you flip the page to 1225, you'll see that Melissa texts The Hollywood Reporter story to this group thread when it goes up.
Do you see that?
A Uh-huh.
Q Okay. And then Ashlea says:
(As read):
"Oh, that's really good, Mel. Like really good."
Do you see that?
A I see it.
Q And then Amy says:
"Boom! This is good."
Right?
A I -- yes, I see it.
Q And then Amy, lower below, says:
(As read):
"You are going to hear from all the problematic men! Dick pic-a-palooza."
Ashlea says:
"Men are always the problem. You're in the right game."
Do you see that?
A I do.

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Q What do you think of this seeing it now?
MS. SHAPIRO: Objection.
THE WITNESS: I think it sounds like a group of female friends talking to each other about an article.
BY MS. SHAH:
Q Are you pleased to see that Melissa was joking with her friends about the article that was causing you consternation at the time?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not pleased. I don't think that's the word but...
BY MS. SHAH:
Q Are you pleased by the fact that when you asked her to explain this article for you and what it meant, she didn't tell you any of this?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sorry, can you?
BY MS. SHAH:
Q Are you pleased by the fact that when you asked Melissa, explain this article to me and what it means, she didn't tell you any of this?
MS. SHAPIRO: Objection.
THE WITNESS: Again, I wouldn't say I'm pleased. No.

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BY MS. SHAH:
Q Are you pleased to be lumped in, among Melissa's friends, with a group of all the problematic men that need Melissa's help?
MS. SHAPIRO: Objection.
THE WITNESS: I would hope that they weren't thinking I was one of the problematic men, but that she was going to hear from all of the problematic men. Then it says:
(As read):
"Dick pic-a-palooza."
So, whatever that means.
BY MS. SHAH:
Q Do you understand from this that essentially what they're saying is, this is an article about how Melissa has helped Johnny Depp in his abuse trial against Amber Heard and is now helping you in relation to the allegations by Blake Lively against you, and so now she's going to be hearing from all of the problematic men?
MS. SHAPIRO: Objection.
THE WITNESS: I believe one could infer that that was what they were talking about.
BY MS. SHAH:
Q Do you see Melissa anywhere in this text

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thread saying, what are you talking about, Justin is not a problematic man?
MS. SHAPIRO: Objection.
THE WITNESS: Not in the pages that you gave me.
BY MS. SHAH:
Q Instead, if you look at 1226, you will see that Ashlea says:
(As read):
"Blake Lively noting Melissa's name. Haha."
Then Amy says:
(As read):
"Joaquin Phoenix is calling."
And then Melissa says:
(As read):
"I fucking wish."
Right?
A I see that.
Q Do you have a view from this text thread about whether or not Melissa thought the publication of this article was going to be good for her business?
MS. SHAPIRO: Objection.
THE WITNESS: I can't guess on what

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Melissa was thinking or feeling at that time.
BY MS. SHAH:
Q Do you think it would have been fair for people to infer from the fact that you chose to hire Melissa Nathan, that you were now one of a group of problematic men that she tended to work with?
MS. SHAPIRO: Objection.
THE WITNESS: Do I think it would be fair for people to infer? I think people's opinions are fair. I mean, I -- I can't control people's opinions.
BY MS. SHAH:
Q Do you think that would be a fair inference for people to draw from the fact that you had hired Melissa Nathan who had also worked with other problematic men?
MS. SHAPIRO: Objection.
THE WITNESS: I think -- yeah. I think that would be fair. I think in this case, yeah.
BY MS. SHAH:
Q Do you think you're a problematic man?
MS. SHAPIRO: Objection.
THE WITNESS: I don't.
BY MS. SHAH:
Q Not in any respect?

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MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure how to answer that.
BY MS. SHAH:
Q With a yes or no.
A I don't.
Q Okay.
Do you think that this is the type of association, looking back with hindsight, that Steph Jones was trying to warn you about when she warned you not to hire Melissa Nathan?
MS. SHAPIRO: Objection.
THE WITNESS: Again, I -- I don't know everything that was in Stephanie Jones's head, but I think that could be a fair thing to think.
BY MS. SHAH:
Q You said you felt at the time that Stephanie Jones had an agenda in warning you against Melissa Nathan. Do you remember that?
A I do.
Q Seeing this and in hindsight, do you still think she had an agenda or do you think she was trying to protect your interests?
A I don't -- I can't know what she was truly doing. I just know that the feeling that I

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had at the time. And it felt -- again, it just felt very much like an agenda.
Q Based on everything that has happened since you hired Melissa Nathan, do you regret the decision to hire her?
MS. SHAPIRO: Objection.
THE WITNESS: I really try to not have regrets.
BY MS. SHAH:
Q Is this one of them?
MS. SHAPIRO: Objection.
THE WITNESS: I really try to not have regrets. I don't have regrets.
BY MS. SHAH:
Q You never have regrets?
MS. SHAPIRO: Objection.
THE WITNESS: Not so much regrets. No.
BY MS. SHAH:
Q Okay.
You worked with a woman named Katie Case while she was at The Agency Group; is that right?
A I know the name because she was on messages and a Zoom or here or there, but I -- I don't think I personally worked with her.
Q Okay. But she was on the team at TAG --

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A Yes.
Q -- that was working with you on the Wayfarer and Baldoni account; is that right?
A Yes. Yes.
Q Okay. You testified that you haven't read her deposition in this case; is that right?
A Correct.
Q Has anyone -- not a lawyer. Has anyone other than a lawyer told you anything about what she testified?
A No.
Q Okay. Are you aware --
A Hold on. I just want to be -- there was Breanna and Katie.
Q Uh-huh.
A And I am not sure who is who. So --
Q Okay.
A -- I -- I may mix the two up because -- but I know they're both employees or former employees or -- so I just want to say that I might confuse two of them.
Q Sure. Have you ever seen them on Zoom? Do you know what they look like?
A I would need the name under their photos --

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Q Okay.
A -- to tell you who was who.
Q Are you aware that Katie Case testified under oath in this case that Melissa Nathan instructed Katie Case to write the copy for the Stephanie Jones Leaks website?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q Does that surprise you?
MS. SHAPIRO: Objection.
THE WITNESS: It would surprise me.
BY MS. SHAH:
Q Are you aware that Katie Case testified under oath in this case that Melissa Nathan gave her talking points for the copy for the Stephanie Jones Leaks website, including that Stephanie Jones holds clients hostage, that she leaks clients' confidential information, and that she treats her employees horribly?
MS. SHAPIRO: Objection.
THE WITNESS: I was unaware.
BY MS. SHAH:
Q Okay. Are you aware that Katie Case testified under oath in this case that she worked

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with Melissa and Jed Wallace to create and publish the Stephanie Jones Leaks website?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: I was unaware.
BY MS. SHAH:
Q Are you aware that Katie Case has testified under oath in this case that she wrote copy for five or six tweets at Melissa Nathan and Jed Wallace's instruction for an X account Lying Steph Jones?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I was not aware.
BY MS. SHAH:
Q Melissa Nathan never told this to you?
MS. SHAPIRO: Objection.
THE WITNESS: Nobody has, but you have.
BY MS. SHAH:
Q Okay. Did you speak to Melissa Nathan at all after her own deposition?
MS. SHAPIRO: Outside the presence of lawyers?
MS. SHAH: Yes.
THE WITNESS: Yes, Jamey and I had a

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one-minute phone call with her.
BY MS. SHAH:
Q What was the substance of that phone call?
A Great job. How are you feeling? Are you okay?
Q What did she say?
A She said she was exhausted and it was really hard. It was mostly -- it was mostly Jamey kind of just pouring into her, making her feel good.
Q During this phone call or any time otherwise, did she ever tell you or Jamey that she and I had a lengthy, lengthy conversation about the Steph Jones Leaks website and what Katie Case testified under oath?
A No.
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q All right.
Are you aware that Katie Case testified under oath that Melissa -- that she worked with Melissa Nathan and Jed Wallace also to create a smear website against a woman named Amanda Ghost on behalf of their client Rebel Wilson?

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MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I'm not aware of any of this -- of anything that she had testified. But no.
BY MS. SHAH:
Q Okay. Have you seen any reporting about the fact that Melissa Nathan and Katie Case were involved in creating a smear website about Amanda Ghost on behalf of their client Rebel Wilson?
A I haven't seen anything. I feel like I was made aware that there's another lawsuit happening.
Q Do you know that Melissa Nathan and TAG had been named in this lawsuit?
A I think that's how -- why I was made aware.
Q Okay. Do you know that Jed Wallace has not been named as a defendant in that lawsuit but is named in the lawsuit as one of the people who was involved in creating that smear website on Amanda Ghost?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I do not.

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BY MS. SHAH:
Q Okay. Do you know that Bryan Freedman also represented Rebel Wilson in connection with those lawsuits?
A I did not.
Q Okay. Are you aware that there's text evidence in this case about Melissa instructing Katie Case and Jed Wallace instructing Katie Case about the copy to write against Amanda Ghost on behalf of Rebel Wilson?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: I -- I don't. I didn't even know who Amanda Ghost was.
BY MS. SHAH:
Q No one showed this text to you?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: No.
MS. SHAH: Okay, 68, please. I'm going to hand you what's marked as Exhibit 11. It's a text thread between Katie Case and Melissa Nathan, stamped KCASE, several zeroes, 4949.
(Exhibit 11 marked for identification.)

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BY MS. SHAH:
Q It's a long text thread, but if you could focus for me on the page 4951.
MS. SHAPIRO: Mr. Baldoni, read as much as you need to to answer questions.
THE WITNESS: I have no idea what I'm looking at here.
BY MS. SHAH:
Q You can --
A This is not something I'm on, right?
Q No, it's not. You can look at any time at as much of this as you want. I'm going to try and help direct you, and I'm going to direct you to start at 4951.
I want you to look at the text message from Melissa Nathan at 9:40 a.m. where she says --
A Sorry. I'm just reading the first page --
Q Sure.
A -- and I'm having a hard time reading. Is this -- is this blown up somewhere?
Q It probably is in the back, but it's not relevant to the questions I'm going to ask you. Feel free to look at it anyway.
Actually, you know what? I am going to

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ask you about it, so go ahead and look at it.
A Happy I'm preparing.
Okay.
Q Let's start at the top. You'll see at 9:36 a.m., Melissa texts a screenshot from someone named Scott, with a photo.
Do you see that?
A Uh-huh.
Q You understand that to be Scooter Braun, right?
A Yes.
Q You know him, don't you?
A I do.
Q Okay. And then down below, Katie Case says:
(As read):
"Good for you."
And Melissa Nathan says:
(As read):
"He cannot expect us to work with Stephanie. I won't do it."
Do you see that?
A I do.
Q Did you have any understanding at the time that Melissa Nathan had extreme frustration

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about working with Stephanie Jones on Scooter Braun's account?
A No.
Q No.
Did you have an understanding at the time you hired her that she had extreme animosity towards Stephanie Jones stemming in part from their mutual work on Scooter Braun's account?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q Have you come to have that understanding at any point since, or is this the first time you're hearing about it?
MS. SHAPIRO: Objection.
THE WITNESS: This is the first time I'm hearing about it in this way, yeah.
BY MS. SHAH:
Q Did Scooter Braun ever express to you any issues that Stephanie Jones and Melissa Nathan had about working together for him?
MS. SHAPIRO: Objection.
THE WITNESS: Scooter and I rarely, if ever, talk.

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BY MS. SHAH:
Q Have you talked to him since these lawsuits were filed?
A No.
Q Not once?
A No. Not once.
Q Okay. Are you aware that Melissa Nathan and her team at TAG would regularly send texts about Stephanie Jones calling her a fucking bitch and saying other pretty nasty things about her?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know how I would be aware of that.
BY MS. SHAH:
Q Were you aware that they felt that way?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q Okay. Were you aware that Melissa and Jen Nathan [sic] joked multiple times about killing Stephanie Jones --
A Sorry. Melissa and Jen?
Q Jen Abel.
A Okay.
Q Forgive me.

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A I didn't know if there was a new party to the case.
Q No. My mistake.
Were you aware that Melissa and Jen Abel have joked multiple times about killing Stephanie Jones as a gift to each other?
MS. SHAPIRO: Objection.
THE WITNESS: I am not.
BY MS. SHAH:
Q Okay. That's not something that anybody has mentioned to you?
A No.
Q Okay.
A No.
Q You see below, Melissa says:
(As read):
"He cannot expect us to work with Stephanie. I won't do it."
And then Katie Case says:
(As read):
"It's just not possible. Oh, my gosh, wait. What if you used the Business Insider thing as a reason not to do it? This really showcases how little she can be trusted. I don't want her

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interacting with my team. We're working too hard and I'm worried about details being leaked internationally, if there is a difference of opinion."
Do you see that?
A I do.
Q You understand from this text message that Katie Case is suggesting that Melissa Nathan should use the Business Insider article that's coming out about Steph as a reason to try to get Scooter Braun to separate from her.
Do you see that?
MS. SHAPIRO: Objection.
THE WITNESS: I do. I'm just -- my brain is --
MS. SHAPIRO: Can we take a break?
THE WITNESS: No, I'm just trying to -- there's so many pieces here. Okay. So one more time?
BY MS. SHAH:
Q You see that Katie Case is suggesting to Melissa Nathan that they should use this Business Insider article that is coming out about Steph, show it to Scooter as a reason he should stop working with Steph?

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MS. SHAPIRO: Objection.
THE WITNESS: Okay.
BY MS. SHAH:
Q Okay?
A And --
Q Do you see that?
A And do I see that? Got it. There's a lot of dots. If this is the same Business Insider thing, which I don't know if it is, then yes. I don't -- I just don't know what the Business Insider thing is they are talking about here. I was not a part of this conversation.
Q Right. And you're not aware that Katie Case and Melissa Nathan actually fed most of the details to the Business Insider reporter to get them to publish that article in the first place, right?
MS. SHAPIRO: Objection.
THE WITNESS: Correct.
MS. SHAH: Okay. All right. Let's keep flipping.
MS. SHAPIRO: Counsel, can we take a ten-minute break, please? Were you almost done with the document? If you're almost done with the document, we can wait until after you finish with the document.

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MS. SHAH: I probably have ten more minutes of questions on this document.
MS. SHAPIRO: Then let's take a break now then.
MS. SHAH: All right. I trust you're not going to talk about the document during the break?
MS. SHAPIRO: No.
MS. SHAH: All right.
THE VIDEOGRAPHER: We are going off the record. The time is 2:46 p.m.
(Recess.)
THE VIDEOGRAPHER: You're back on the record. The time is 3:11 p.m.
BY MS. SHAH:
Q Okay. If you'll look for me at Exhibit 11, which we were discussing before the break, I would like to direct your attention to the page marked 4951.
A Uh-huh.
Q You see at 9:39, it's the second text, Katie Case writes to Melissa Nathan:
(As read):
"Also, hi, how are you?"
Do you see that?
A Yes.

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Q Okay. And Melissa Nathan writes:
(As read):
"Is 6:30. I'm already trying to kill one Rebel story and dealing with Mattel loss for Bryan."
Do you see that?
A I do.
Q And I'll represent to you that Melissa Nathan testified in this case that Rebel meant Rebel Wilson and Bryan meant Bryan Freedman.
A Thank you.
Q Okay. Then Melissa Nathan writes:
(As read):
"So basically, Rebel wants one of those sites."
MS. SHAPIRO: Objection.
MS. SHAH: I wasn't finished with the question yet, but...
MS. SHAPIRO: Well, okay, but you misread the text.
BY MS. SHAH:
Q Melissa Nathan writes:
(As read):
"So basically, Rebel wants a one of those sites."

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Do you see that?
A Yes.
Q And then Katie Case responds two texts below:
(As read):
"Ah okay."
And then Melissa writes:
"Should be a mixture of that document that I think Carolina pulled about Amanda goes or the intern pulled, the voice note and this."
And then there's an attachment.
Do you see that?
A Yes.
Q Okay. And then Katie Case writes:
(As read):
"Okdokes. I'll pull this together in the morning."
Do you see that?
MS. SHAPIRO: Objection.
BY MS. SHAH:
Q (As read):
"I'll pull this together this morning."
Do you see that?
A That, I see.

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Q All right. And then Melissa writes:
(As read):
"Thank you. It can be really, really harsh and then link it to the Jed S voice thing."
Do you see that?
A Yes.
Q All right. I will represent to you that Melissa testified that Jed S is Jed Wallace. Okay.
All right. And if you look at the text above, I will represent to you that she testified that when she said "should be a mixture of that document that I think Carolina pulled about Amanda goes or the intern pulled", Carolina is Carolina Hurley, who works for TAG, and "Amanda goes" meant Amanda Ghost. Okay?
A It's a lot of names. But okay.
Q All right. Then she references a voice note and an attachment. There's a voice note from Jed Wallace attached to this text thread that talks about what the smear allegations against Amanda Ghost should be, that go on the website. Okay?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.

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MS. SHAH: That's not a question. I'm just telling you that.
THE WITNESS: Oh, thank you for telling me.
BY MS. SHAH:
Q Sure. And if you look at the attachment that Melissa attaches, it starts at the page marked 4958.
A Okay.
Q Starts by saying:
(As read):
"This website is dedicated to telling the world the truth about Amanda Ghost who has maliciously tried to destroy the lives of countless artists. Seeing as she is currently funded by one of the world's richest men, it has been near impossible to release information about her wrongdoings for the past two decades."
And at the bottom of the paragraph, it says:
"More recently, her behavior has escalated into unwanted sexual advances on young women. She is the Indian

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Ghislaine Maxwell whose only friend in this world seems to be convicted felon Boy George."
Do you see all this?
A Yes.
Q Are you aware of whether or not this is a first draft of the copy that ultimately became a smear website against Amanda Ghost?
A I've never seen this before.
Q All right.
A I have no knowledge of any of this stuff.
Q All right. If you flip the page, sorry, to where we were before. My apologies. Go to 4952.
At the top of the page, at 9:56, there's a text from Melissa that says:
(As read):
"Len - Russian oligarchs and making her a madame basically lol said Jed."
Do you see that?
A Uh-huh.
Q I will represent to you that Melissa testified that "Jed" meant Jed Wallace.
A Yes.
Q And then Katie Case writes:
(As read):

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"Oh, my god. Lol. Okay, this one will be fun."
Do you see that?
A I do.
Q Okay. Flip the page. Next page, 4953. There's a text from Melissa Nathan at 1:58 p.m. in the middle of the page where she says:
(As read):
"I have to drive to this fucking meeting. Do you think you'll have that copy for Jed today because I need to make it really hammy?"
Do you see that?
A Uh-huh.
Q Okay. And Jed meant Jed Wallace. If you go down later in the page, Katie Case says at 4:02 p.m.
(As read):
"Is Jed doing anything on Justin? I'm having Zoe monitor, but that's not the same lol."
Do you see that?
A I see it.
Q Okay. And I will represent to you that Jed meant Jed Wallace and Justin means you.

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A Great.
Q If you flip the page, Melissa Nathan says:
(As read):
"Not yet. They've not signed him on."
Katie Case writes:
"Urg, I wish they'd get a move on. All they care about is social right now and we can't do anything about it lol. Also, what are we supposed to do about a journalist calling her? Like, do your job, Jen. Lol."
And then Melissa writes:
"Jed and Bryan asking me for copy. Lol, kill me."
Do you see that?
A I do.
Q All right. And I will represent to you that Jed is Jed Wallace and Bryan is Bryan Freedman.
Do you see that?
A I do.
Q All right. Did you have any knowledge before I just showed you this document that this has been produced in this case?
A No.

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Q Okay. Would you be surprised to learn that Katie Case testified that Melissa Nathan worked with Bryan Freedman and Jed Wallace to create a smear website against Amanda Ghost on behalf of client Rebel Wilson?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: I believe I would be.
BY MS. SHAH:
Q Okay. Is that something you would've wanted Melissa Nathan to tell you about when she was representing you and suggesting that you bring Jed Wallace on to handle socials?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: I don't know if I would have expected it because I didn't know it existed.
BY MS. SHAH:
Q Okay. If Melissa Nathan and Jed Wallace had a practice of creating smear websites and smear social media accounts against adversaries of their clients, is that something you would have wanted to know before you decided to hire both of them to help you against Blake Lively?
MS. SHAPIRO: Objection.

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MR. GLOVER: Objection. Form.
THE WITNESS: I would imagine so, yes.
BY MS. SHAH:
Q Do you know who the Alexander brothers are?
A No.
Q Have you ever heard of three brothers with the last name of Alexander who are real estate agents in Miami who have been accused by many women of rape and sexual misconduct?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q Okay. Are you aware that Katie Case testified under oath in this case that she also worked with Melissa Nathan and Jed Wallace to create a smear website about the victims of the Alexander brothers on their behalf?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: As I said, I didn't know who they were so I didn't know anything else.
BY MS. SHAH:
Q And nobody has told you, in this litigation, that this is what Katie Case has

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testified under oath about the activities of Melissa Nathan and Jed Wallace?
MS. SHAPIRO: I'm going to object and just --
MR. GLOVER: Objection. Form.
MS. SHAPIRO: -- Instruct you and remind you not to provide any information that you only received from any attorneys, if you know anything about the answer to this question.
THE WITNESS: No attorneys had told me that, no. I don't know anything about it. You've told me, though.
BY MS. SHAH:
Q Okay. Is the tactic of creating defamatory smear websites and social media posts about people a tactic that you approve of?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: It is not a tactic that I would ever employ. No.
BY MS. SHAH:
Q Is it a tactic that you would ever approve of?
MS. SHAPIRO: Objection.
THE WITNESS: I think I said a similar

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thing to that. I would never approve of anyone creating a smear website for me. I can't stop what someone else does.
BY MS. SHAH:
Q Would you want to knowingly associate yourself with people who regularly employ such tactics against other people?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I can't imagine I would.
BY MS. SHAH:
Q Are you happy that you are now associated with at least two people who have employed such tactics against other people?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: There is nothing about this situation that I am happy about.
BY MS. SHAH:
Q Specifically with respect to the fact that you have associated yourself with at least two people in your employ who have -- who have a history of employing such tactics, are you happy about that?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.

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THE WITNESS: As I said, there is nothing about any of this that I'm happy about.
BY MS. SHAH:
Q All right.
Do you have any understanding of whether Melissa Nathan and Jed Wallace have employed these tactics against Stephanie Jones?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: No. I don't know why I would.
BY MS. SHAH:
Q Well, because they work for you.
MS. SHAPIRO: Objection.
THE WITNESS: Who works for me?
BY MS. SHAH:
Q Melissa Nathan and Jed Wallace.
MS. SHAPIRO: Objection.
Counsel, do you have a question?
THE WITNESS: I don't understand --
MS. SHAPIRO: You're making statements. Can you pose a question, please?
BY MS. SHAH:
Q Do you have any knowledge about whether Melissa Nathan and Jed Wallace have employed these

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tactics against Stephanie Jones during the pendency of these litigations on your behalf?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: Absolutely not. Absolutely not.
BY MS. SHAH:
Q Okay. Do you have any idea or understanding about whether Melissa Nathan and Jed Wallace have employed similar tactics against Blake Lively, either before or during the pendency of this lawsuit on your behalf?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
MS. SHAPIRO: And I just want to instruct you again, Mr. Baldoni, to the extent there's a question posed about your understanding about anything after the litigation started, do not share any information you received only from your attorneys.
THE WITNESS: Would you mind repeating the question?
BY MS. SHAH:
Q Do you have any understanding about whether Melissa Nathan and Jed Wallace have employed

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similar tactics against Blake Lively, either before or during the pendency of this lawsuit on your behalf?
A No.
MR. GLOVER: Objection. Form.
BY MS. SHAH:
Q Is it possible, having seen everything that I've showed you here today, that Melissa Nathan and Jed Wallace have employed these kind of tactics against Stephanie Jones during the pendency of this lawsuit or before?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I have no idea.
BY MS. SHAH:
Q It could have happened; you just might not know about it, right?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: Lots of things could have happened. I don't know about any of them. I don't know how -- I don't know how to answer that or how that's relevant to anything.
BY MS. SHAH:
Q You can't say with 100 percent personal

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certainty that Melissa Nathan and Jed Wallace have never employed these tactics against Stephanie Jones behind your back, can you?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I can tell you that I would never ask them to and I have no knowledge of anything that they've done. So I don't know how to answer that.
BY MS. SHAH:
Q But sitting here today under oath, you cannot tell me with 100 percent certainty that Jed Wallace and Melissa Nathan have never employed these tactics against Stephanie Jones behind your back, can you?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I think you just answered your own question.
BY MS. SHAH:
Q I'm looking for an answer from you.
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: But how could I know something if it happened behind my back?

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BY MS. SHAH:
Q I'm asking if --
A I don't know. I genuinely have no knowledge of any of this. So I just don't understand what you're asking of me.
Q My question is: Are you willing to testify under oath --
A That something is possible?
Q -- with 100 percent certainty that it didn't happen?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: No, because I couldn't testify either way that it didn't happen or did happen because I -- I'm not a part of it. I don't know anything about it.
BY MS. SHAH:
Q Okay. Are you able to testify with 100 percent certainty under oath that Melissa Nathan and Jed Wallace didn't employ similar tactics against Blake Lively behind her back?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: My answer is the same.

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BY MS. SHAH:
Q Which is no, you cannot testify with 100 percent certainty that it didn't happen?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Can we -- can we ask him questions that he has knowledge of? This is completely out of bounds and --
MS. SHAH: With all due respect --
MS. SHAPIRO: -- crazy.
MS. SHAH: -- you're limited to non-speaking objections. Make your objection and --
(Cross talk.)
MS. SHAPIRO: Yeah. But you -- you have an obligation to ask questions --
MS. SHAH: I'm not going to debate you on the record.
MS. SHAPIRO: -- that are likely calculated to lead to discoverable evidence. None of this fits that criteria.
MS. SHAH: That's in my judgment, not yours. So I'm going to ask my questions --
MS. SHAPIRO: Well, if you want to waste another three hours, go ahead.
MS. SHAH: It might be a waste of your

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time. It's not a waste of mine.
Can you read that question back, please?
THE STENOGRAPHIC REPORTER: Sure. Let me find it.
MS. SHAPIRO: This is not in good faith, Counsel.
MS. SHAH: I disagree with you, Counsel.
THE STENOGRAPHIC REPORTER: Okay. The last question, which is not -- which is:
(Record read as follows):
"You cannot testify with 100 percent certainty that it didn't happen?"
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: Sure. I -- I -- I have no idea what happened or didn't happen so I can't testify either way whether it did or didn't, as I wasn't a part of any of it.
BY MS. SHAH:
Q It appears that there was a lot about what Melissa Nathan and Jed Wallace were doing with relation to putting up smear websites and social media accounts and digital manipulation that you weren't aware of before I just showed you, right?
MR. GLOVER: Objection. Form.

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MS. SHAPIRO: Objection.
THE WITNESS: I think that's a fair statement.
BY MS. SHAH:
Q Okay. Do you have an understanding of whether anyone at TAG ever planted or fed information to a reporter that resulted in a negative story about Blake Lively in August of 2024?
MS. SHAPIRO: Objection.
THE WITNESS: I do not.
BY MS. SHAH:
Q You don't know one way or another?
A I know the directives were to not do anything negative. Absolutely.
Q And if someone from TAG has testified in this case that they, in fact, did plant a negative story about Blake Lively, that's not something you were aware of?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q Are you aware that Breanna Butler Koslow testified under other in this case that she deliberately leaked information to the Daily Mail in August of 2024 that resulted in a negative story

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about Blake Lively?
A I was not.
Q No one has told you that since she testified?
MS. SHAPIRO: Objection. To the extent it calls for any communications with your attorneys, do not answer.
THE WITNESS: No.
BY MS. SHAH:
Q If that had happened in August of 2024, is that someone you would have -- is that something that as TAG's client, you would have expected they run by you before they did?
MS. SHAPIRO: Objection.
THE WITNESS: TAG had very clear directions to not create anything negative.
BY MS. SHAH:
Q And if they did create something negative that resulted in a negative story about Blake Lively, is that something they would have expected -- you would have expected them to tell you about?
MS. SHAPIRO: Objection.
THE WITNESS: I would have expected them to tell probably Jamey. I was not in communication

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every day about everything.
BY MS. SHAH:
Q Okay.
What's your understanding -- you testified earlier about a truce that you believed was in place between your camp and Blake Lively's camp with respect to media, right?
A Yes.
Q And your understanding is that that truce had been brokered between Melissa Nathan and Leslie Sloane, right?
A That's what was relayed to me.
Q Do you have any understanding of whether or not and how that truce may have been broken?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know.
BY MS. SHAH:
Q Okay. Do you think someone from TAG deliberately leaking negative information about Blake Lively in order to plant a story about her in the Daily Mail broke that truce?
MS. SHAPIRO: Objection.
THE WITNESS: I have -- I don't know.
BY MS. SHAH:
Q Well, the truth -- the truce was to not

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put out any negative stories about each other, right?
A Yes.
Q And so if someone from TAG did, in fact, put out a negative story about Blake Lively, you would agree with me that that broke the truce, right?
A I'm sorry. Let me go back. My understanding of the truce wasn't negative stories. My understanding of the truce was to not be in touch with any reporters about any of that, anything. So I don't think it was just negative stories. It was commenting on the -- the current speculation.
Q Okay. So if the truce was to not be in contact with any reporters about anything --
A Anything related to the speculation about what people were talking about.
Q Sure. If the truce was to not be in contact with any reporters relating to anything about the speculation about what was going on between you and Blake Lively on the film, you would agree with me that somebody from TAG planting a negative story against Blake Lively broke that truce?
A If that's what happened, then I would

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imagine that that would be accurate. I don't know if that's what happened. I wasn't there.
Q Well, you were there; you just didn't know, right?
MS. SHAPIRO: Objection.
THE WITNESS: Well, this is the first I'm hearing about any of this, so I don't know.
BY MS. SHAH:
Q Okay. Are you pleased this is the first time you're hearing about any of what I'm telling you now?
MS. SHAPIRO: Objection.
THE WITNESS: You asked me a lot if I'm pleased or happy. I don't think that's a fair characterization of anything that I'm feeling right now.
BY MS. SHAH:
Q Are you unhappy that you never heard before any of the things I'm telling you now?
MS. SHAPIRO: Objection.
THE WITNESS: If they turned out to be true, then yeah, that would be an accurate feeling of what I would feel. But I haven't been able to do any of my own investigation. You're just telling me, and I'm hearing and responding to you.

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BY MS. SHAH:
Q If it turns out that all of these things are true, do you wish in hindsight that you had followed Stephanie Jones's advice about Melissa Nathan?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: I -- I don't even know how to answer that. Do I wish in hindsight -- so if everything you're saying is true, do I wish in hindsight that I had followed Stephanie Jones's advice back last year before hiring Melissa Nathan?
BY MS. SHAH:
Q Uh-huh.
A I -- I can't answer that. I...
Q Do you still have no regrets about hiring Melissa Nathan?
A As I said, I really try to not have regrets.
Q So is that a no?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know. I don't know. And I don't mean to laugh at your questions.
MS. SHAPIRO: Time out. The iPads are not updating.

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THE STENOGRAPHIC REPORTER: That means Wi-Fi probably cut out. Jonathan will reconnect them.
MS. SHAPIRO: Okay. Thank you.
THE VIDEOGRAPHER: Can you just refresh this?
MS. SHAPIRO: Okay. Thank you.
THE WITNESS: Would you like me to be done with this one?
MS. SHAH: Yes, thank you.
I'm going to show you a document that's been marked as Exhibit 12.
(Exhibit 12 marked for identification.)
BY MS. SHAH:
Q It's a text thread between Jennifer Abel and Matthew -- Matthew Mitchell from January 14th, 2024, Bates-stamped JONESWORKS_, several zeroes, 41606.
Just read through this for me.
THE WITNESS: Yes.
BY MS. SHAH:
Q Have you ever seen this before?
A I -- I have not seen this entire text thread. I do believe that one of these was made public at one point. I think -- I don't know where

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it was. I don't know if it was an article, or maybe it was in the lawsuit or something.
Q Have you ever talked to Jennifer Abel about why she said this about you?
A Yes, I did.
Q And what did you say?
A Well, she actually called me one morning. I was sleeping. And she was in tears. And she just said, Justin, I'm so sorry. I said, for what? And then she said, some texts have been made public where I'm talking shit about you, and I'm just so sorry. I don't believe the things that I said. I was just pissed because you didn't want to do something, and I'm sorry.
And I said, I -- I understand. I'm not going to forgive her. I'm not going to, like, hold it against her. I'm sure that -- like, I'm sure if everybody's phone was scanned, I'm sure there's a lot of people that talk shit about a lot of people. So as a -- as a rule, I do my best to not do that. And yet, I am -- I'm sure lots of people have said these things about me.
Q If you flip to the page marked 41608, the text message -- the text message at 2:02 p.m., in the middle of this -- the middle of the page.

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A Uh-huh.
Q She writes:
(As read):
"He may fire us because even if we put together an amazing campaign, it's not going to change the fact that he's so unlikable and unrealistic as a leading man. There's no chemistry with him and Blake. You and I both know that she will be resistant to promote this movie, and press will be reluctant to do anything with Justin without Blake being part of it. So there. Those are my thoughts."
Do you see that?
A I do.
Q Have you ever seen this part of the text message before?
A I don't think so.
Q You left Jonesworks to go with Jennifer Abel as a publicist after she was fired from Jonesworks, right?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure I agree with the framing of your question.

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BY MS. SHAH:
Q Which part do you not agree with?
A Can you ask me again?
Q You left Jonesworks to go with Jennifer Abel as a publicist after Jennifer Abel was fired from Jonesworks, right?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know the -- the sequence. I -- I know that Jennifer had put in her notice, so I'm -- I'm confused by the way the question is asked.
BY MS. SHAH:
Q Let me ask it a different way.
You left Jonesworks to go with Jennifer Abel as a publicist after she left Jonesworks, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yeah. Yes.
BY MS. SHAH:
Q Why?
A Because she was my publicist for years before, and I -- I trusted her.
Q Do you still trust her?
MS. SHAPIRO: Objection.
THE WITNESS: I do.

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BY MS. SHAH:
Q Okay. Have you seen any documents or text messages in this case, or otherwise, where Stephanie Jones is talking shit about you the way Jen Abel was?
A I haven't seen any documents about Stephanie Jones in general to my knowledge.
Q Okay.
A Are we done with this one?
Q Yes.
A Okay.
Q Are you aware that after Wayfarer onboarded TAG as its crisis publicist, Katie Case and Melissa Nathan were joking about whether your faith was a cult?
MS. SHAPIRO: Objection.
THE WITNESS: I was not aware.
BY MS. SHAH:
Q What do you think about that?
MS. SHAPIRO: Objection.
THE WITNESS: Well, I think anytime somebody makes a religious joke, I think that's not okay. It seems to have happened a lot in this case.
BY MS. SHAH:
Q Including from your own publicist, it seems.
MS. SHAPIRO: Objection.
THE WITNESS: If you want to show it to me, I'd be happy to see it. I haven't heard anything. This is the first I'm hearing about it.
BY MS. SHAH:
Q Sure.
MS. SHAH: Tab 139, please.
I will show you a document that's marked as exhibit?
THE STENOGRAPHIC REPORTER: Thirteen.
MS. SHAH: Thirteen.
(Exhibit 13 marked for identification.)
BY MS. SHAH:
Q It's a text thread between Katie Case and Melissa Nathan from August 4th, 2024 with the Bates stamp NATHAN, several zeroes, 2938.
A Okay. Sorry, there is one more page.
Q Have you seen this before?
A I have not.
Q Were you aware that Katie Case and Melissa Nathan were texting things like this about you while they were on a call with you?
MS. SHAPIRO: Objection.
THE WITNESS: I was not.

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BY MS. SHAH:
Q What do you think about that?
MS. SHAPIRO: Objection.
THE WITNESS: I think they have every right to say whatever they want.
BY MS. SHAH:
Q Did Jennifer Abel ever warn you or Jamey Heath or Tera Hanks against hiring Melissa Nathan before you brought her on as crisis communications?
A Not to my knowledge.
MS. SHAH: Tab 85, please.
THE WITNESS: Are we done with this one?
MS. SHAH: Yes.
THE WITNESS: Thank you.
MS. SHAH: I'm going to show you what's been marked as Exhibit 14. It's a text thread between Jen Abel, Jamey Heath, Stephanie Jones, and Tera Hanks dated 7/26/2024, marked JONESWORKS_, several zeroes, 13939.
(Exhibit 14 marked for identification.)
BY MS. SHAH:
Q Just read through this for a moment if you'd like.
If you look in the middle of the page

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marked 13940.
A Uh-huh.
Q There's a text from Jennifer Abel that says:
(As read):
"Thanks all. As per our conversation, I also had a negative experience where I confronted her with lies and shady behavior and the attempts to poach and I had to get the client involved to straighten out the situation."
Do you see that?
A I do. There was a "with" -- I confronted her, you added a with, but just for the record.
Q Okay. I will rely on what the document says if I misread it.
Do you know whether or not this conversation that she refers to, or this text thread, has to do with Jennifer Abel's prior experience with Melissa Nathan?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not on this thread, so I don't know.
BY MS. SHAH:
Q Did Jamey Heath or Tera Hanks ever relay

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the substance of that conversation or this text thread to you?
A I don't believe so.
MS. SHAH: Tab 86, please.
I'm going to hand you a document marked Exhibit 15. For the record, this is a text thread between Jen Abel and Matthew Mitchell, dated 4/5/2024, marked JONESWORKS_, several zeroes, 41609.
(Exhibit 15 marked for identification.)
BY MS. SHAH:
Q Do you see this?
A I do.
Q All right. If you go to the text starting at 2:02 p.m., you will see Matthew Mitchell says:
(As read):
"MN kinda talks out of both sides of her mouth."
And then Jennifer Abel responds:
(As read):
"You think? She's a piece of shit. I honestly used to like her and now I see her for how she really is."
And then Matthew Mitchell writes:
(As read):

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"She's manipulating things but he's also covering and keeping her on because of the debt owed to" -- somebody -- "It's gross. Tbh."
Do you see that?
A Uh-huh.
Q Did Jen Abel ever relay to you that she thought, at least at some point, that Melissa Nathan is a piece of shit?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sorry -- I'm just -- I'm almost done with the document.
BY MS. SHAH:
Q Sure.
A Okay. Would you mind re-asking your question?
Q I will ask it this way.
Did Jennifer Abel ever relay to you any negative sentiment she ever had about Melissa Nathan before she recommended that you bring her on as crisis communications?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MS. SHAH:
Q Okay.

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Are you aware that after Melissa Nathan was hired as your crisis publicist, Melissa and Jen Abel were talking about Jen taking you and Wayfarer and all of Jonesworks' clients with her when she left Jonesworks?
A I was not.
Q Okay. Do you know whether or not Jennifer Abel recommended that you hire Melissa Nathan so that she could position Melissa Nathan to transition with you and Wayfarer and Jen?
A I'm sorry?
MS. SHAPIRO: Objection.
THE WITNESS: Okay.
BY MS. SHAH:
Q I will start it again.
A I feel like I'm watching an episode of a TV show. Like, following the storylines.
Q Sure.
A Can you break that down simply for me?
Q Yeah. Are you aware of whether or not Jen Abel and Melissa Nathan ever had a plan amongst each other to steal you and Wayfarer as clients from Stephanie Jones?
A I am not aware of any such plan.

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Q Okay. Are you aware of whether that is the reason that Jen Abel recommended that you hire Melissa Nathan?
MS. SHAPIRO: Objection.
THE WITNESS: I am not aware.
BY MS. SHAH:
Q Okay.
MS. SHAH: I'm going to hand you what's been marked as Exhibit 16.
(Exhibit 16 marked for identification.)
THE WITNESS: Thanks. Is this one I'm on?
BY MS. SHAH:
Q Nope.
A Okay.
Q It's a text thread between several people at TAG dated August 2nd, 2024, marked Nathan_, several zeroes, 141.
A May I read through it?
Q Yes.
A All right. Okay.
Q Now, reading through this, do you recognize this as a text thread where the women at TAG are talking through a call that they expect to have with you?

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A It appears to be.
Q Okay. And this is on August 2nd. Do you know whether or not you had formally retained TAG at this point?
A I don't believe we had.
Q Okay. Do you know whether this was the first call that you were on with TAG by this point?
A August 2nd, I was in Sweden for my wife's birthday, I believe. Yes, I believe this sounds like that was around the day that I met them for the first time.
Q Okay. And before this call, you were provided with a scenario planning document from TAG. Do you recall that?
A This -- this scenario planning document, yes. Yes.
Q And do you recall talking or texting to Jen Abel, after you reviewed the scenario planning document, that you were dissatisfied with it?
A I vaguely remember it. I know there are texts. But I...
Q What do you remember about those conversations with Jen Abel?
A I remember reading it and feeling like it wasn't that impressive of a document.

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Q Why did you think it wasn't that impressive of a document?
A It just kind of felt like -- I think the feeling I had was that they were just trying to -- the document kind of felt like they were trying to get the gig maybe. But I just remember not feeling that -- just not loving it.
Q Do you recall feeling like it wasn't sufficiently protective of you?
A I remember feeling like there needed to be more defense. Like I just remember feeling I wanted more protection, yeah.
Q Protection against what?
A I don't know. Everything. I was just scared.
Q Scared of what?
A I had never been in a situation like this.
Q What were you scared could happen?
A Well, I'd been -- I'd just been kicked off my own movie, a film that I was working on for five years. People that I had thought were my friends were not following me anymore publicly and it seemed like things were being done intentionally to cause some sort of public conversation. I had

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never been involved in a crisis and I was just scared. So I think -- I think they could have said they're going to build me an iron dome, and I still probably would have felt like there wasn't enough protection.
Q Were you scared of things that Blake Lively or Ryan Reynolds might do?
A I was terrified of Ryan Reynolds and Blake Lively in general. Especially considering they had just threatened us and said they were taking the gloves off if I didn't release a statement.
Q What did you understand "taking the gloves off" to mean?
A Again, I didn't know. I know what they were able to -- are you okay?
Q Excuse me.
A Yeah. I know somehow they were able to take my movie from me. So I didn't know what they were capable of.
Q Is that what you believed happened? That they took your movie from you?
A Yes.
Q Were you scared at this point in time that Blake Lively might make public any of the

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accusations about your on-set behavior that she had made privately to you and to Sony?
MR. GLOVER: Objection. Form.
THE WITNESS: I was afraid -- are you okay?
I was afraid of, honestly, of lies coming out about me.
BY MS. SHAH:
Q Lies from Blake Lively?
A Yes.
Q About your behavior on set?
A Well, it was one of the things. Lies in general. I didn't know -- I mean, at this point, I was already made aware that her team was pitching stories that I was in a cult, and I had already been told that Mr. Reynolds had told agents that I was a predator of some kind so there was -- I was made aware that there was damage that they were trying to do to me already. And I didn't know what they were capable of.
Q Is it fair to say that at this point in time, you wanted to defend yourself in the event that Blake Lively made public some of the accusations about your on-set behavior that she had already made privately, including to you and

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Wayfarer and to Sony?
MS. SHAPIRO: Objection.
THE WITNESS: I think it's fair to say that I wanted to plan to defend myself from any lies that were about to be told or anything else they were going to try to do to me.
BY MS. SHAH:
Q Including lies about or what you felt to be lies about her concerns with your on-set behavior?
A I think that is a part of it, yeah.
Q You say in one of these -- so this is a little bit hard to follow, I understand.
A It's all good.
Q If you turn for me to page 142. You see that it looks like Jen Abel -- or sorry. Melissa Nathan has attached screenshots of a conversation between her and Jen Abel.
Do you see that?
A Uh-huh.
Q And if you flip the page to 143, and you can see this better on page 150, it looks like Jen Abel had sent Melissa Nathan screenshots of a conversation that she had with you.
A Okay. So I'm looking at a text message

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that came from Melissa to who? To someone else.
Q Look on 143.
A And then inside that text message, it's a screenshot that Melissa included of a text message between me and Jen.
Q It looks like that.
A All right.
Q Flip to 150, if you would.
MS. SHAPIRO: One five zero.
BY MS. SHAH:
Q The screenshots in the black boxes here.
A Uh-huh.
Q Do you recognize that as a text conversation between you and Jen Abel?
A That's my name. So I would assume it is.
Q And you say:
(As read):
"Morning. Not in love with the document they sent. Not sure I'm feeling the protection I feel on the call."
Do you see that?
A I do.
Q What call are you referencing?
A I don't know. I'm imagining -- I don't

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see a date on this, but I'm imagining it's the call the first time that I met them.
Q "Them" being TAG?
A Yes.
Q Okay.
A But I can't speak to it 100 percent because I don't know the dates.
Q And if you flip forward to 149. That's backwards. Sure.
You will see the black box looks like the text between you and Jen Abel.
A I'm assuming -- is this from the same text thread?
Q Looks like it to me.
A Okay.
Q And then you see someone write to Jen Abel:
(As read):
"We can't write it down to him. We can't write we will destroy her. We will go to this. We will do this. We will do this. We will do this."
Do you see that?
A I do.
Q And then it looks like Jen responds:

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(As read):
"Of course not. But I told him that's the point of talking through."
Do you see that?
A I do.
Q Do you have a recollection when you expressed to Jen Abel that you weren't thrilled with the scenario planning document that she responded to you, in sum or substance, We're going to have a call with TAG, that's the point of talking this through?
MS. SHAPIRO: Objection.
THE WITNESS: I do not even remember the phone call with Jen --
BY MS. SHAH:
Q Okay.
A -- that we're even talking about.
Q You don't recall the phone call with Jen where you expressed to her that you weren't -- or any text or conversation with Jen where you expressed to her, I'm not thrilled with this document?
A I -- I believe it was in a text message --
Q Uh-huh.
A -- that I think you have here.

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Q Uh-huh.
A I don't -- I don't know if we had a phone call about it.
Q Okay.
A We might have. But -- what was your question?
Q My question was: When you expressed to her you weren't thrilled with the document --
A Yeah.
Q -- did -- do you remember her giving you any comfort around, we're going to talk it through with TAG, and -- and you should understand it better once we have this call?
A I believe this is what she texted me, which is in this photo. I could -- but, again, I could be mistaken.
Q But independent of this document, do you have a recollection of her responding in that manner or any matter when you said, I'm not thrilled with this document?
A I mean, my recollection is that it was a scenario planning document, and that's -- it's all I really remember about it. I think it was just done via text.
Q Okay.

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A But I -- you know, if anything else pops in while you're asking me questions, I'll come back and -- and tell you.
Q After you received this scenario planning document, do you recall then getting on a call with people from TAG to talk through the scenario plan?
A I'm sure there was a second call. I don't have a specific memory of that call.
Q Okay. Do you have any general memory of that call?
A I have a memory of the first call. I don't really have a memory of the second call.
Q What is your memory of the first call?
A Mostly that my wife was sitting with me, and we were in Sweden. I was in the middle of trying to pull off this massive surprise for her birthday with all of her friends, and while dealing with all this. And I just -- I remember meeting Melissa. I felt very comforted by like -- like, she felt very motherly. And she seemed very kind. She felt like somebody that I could trust.
I think I remember that I had change -- I think I remember starting by apologizing because I had changed the meeting time so many times because we were so far ahead. That's what I remember.

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Q Do you recall Stephanie Jones being on that call that you had with TAG?
A I don't.
Q Do you recall Jen Abel being on that call that you had with TAG?
A Yes.
Q Do you recall Stephanie Jones being on the second call that you had with TAG?
A I really don't remember the second call, so I don't know who was on it.
Q Do you remember if Jen Abel was on it?
MS. SHAPIRO: Objection.
THE WITNESS: Same answer. I'm not even sure there was a -- I'm assuming there was a second call, but that's one I don't remember.
BY MS. SHAH:
Q Do you recall Stephanie Jones being on any call you had with TAG?
A I don't.
Q Do you know if Stephanie Jones ever saw the scenario planning document that TAG sent to you?
A I don't.
Q Okay. If you turn to page 144.
It looks like at the top of the page, Breanna Butler and Katie Case are reacting to your

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criticisms about the scenario planning document?
A Uh-huh.
Q And Breanna says:
(As read):
"I'm sorry that document was strong and we walked through all the possibilities of him doing some big sitdown which would kill him."
Do you see that?
A Yes.
Q And then Katie Case writes:
(As read):
"It's really fucking strong. He can't come off as the victim. She'll destroy him."
Do you see that?
A Uh-huh.
Q Did they ever relay, in sum and substance, to you or did anyone at TAG ever relay, in sum and substance to you, that you can't come off as the victim or Blake will destroy you?
A No. I'm -- I'm not sure what this is saying or what it's about.
Q Okay. And then down below, Breanna Butler says:

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(As read):
"I think he'll be fine on the call once we walk him through."
Do you see that?
A Uh-huh.
Q And then Melissa Nathan says:
(As read):
"He will be. We need to be tough."
Do you see that?
A Uh-huh.
Q And then below, Melissa Nathan writes:
(As read):
"Exactly. Breanna, I need you to be in a good place with your camera on if okay to be able to help me talk really toughly to him. I wouldn't usually ask, but he sounds like a fucking mess."
Do you see that?
A Yes.
Q Did you feel like a fucking mess at the time?
A I don't -- did I feel like a fucking mess? I was really emotional. I mean, I don't know if I would call myself a fucking mess, but I think

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it's -- they are clearly hearing about me. So they're entitled to their opinion.
Q And then below that, Melissa Nathan writes:
(As read):
"And also, this is the first one that Jen is giving us and she's taking all the clients."
Do you see that?
A I do.
Q Do you have any awareness of whether or not Melissa thought that this -- that you were the first client that Jen was giving to TAG, and that Jen was taking all the clients from Jonesworks when she left?
MS. SHAPIRO: Objection.
THE WITNESS: I have no idea.
BY MS. SHAH:
Q Did Melissa ever encourage you to leave with Jen when she left Jonesworks?
A I don't remember her encouraging me.
Q Are you sure about that?
MS. SHAPIRO: Objection.
THE WITNESS: I remember -- I think I remember telling her I was going to go with her, but

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I don't -- I don't remember Melissa saying, like, you should go with her.
BY MS. SHAH:
Q What do you recall about telling Melissa that you were going to go with Jen?
A I don't remember the conversation. I remember -- and I don't remember how it came up. But I remember that I was going to go with Jen anyway, so it wasn't like a secret that we were hiding from anybody.
Q Did you make that decision?
A Did I make what decision?
Q To go with Jen when she left Jonesworks, did you make that decision personally?
A That was a consultation between myself and Jamey and I believe, at the time, Tera.
Q And when did that consultation and decision happen between you and Jamey and Tera?
A I don't know exactly when or the date.
Q Can you place it in time in relation to when Jen actually left Jonesworks?
A Can you help me with when she left Jonesworks?
Q Sure. If Jen --
A Or was she fired from Jonesworks?

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Because you had said earlier she was fired.
Q Well, I will ask you what you understand about that in a little bit. But this text -- let me ask it this way.
Do you have a recollection of discussing and deciding that you were going to go with Jen, like one day before she actually left or like one month before she actually left?
MS. SHAPIRO: Objection.
THE WITNESS: Can you help me with when she actually left?
BY MS. SHAH:
Q Sure. She left on August 21st of 2024.
A I -- I can't give you -- I -- I don't know. I -- I don't know exactly when.
Q Were you aware that she was planning to leave Jonesworks before she actually left?
A I was made aware via Jamey that she had given Stephanie her notice. And so Jamey let me know that she had given notice, and that she would be staying on through the end of the film promotion.
Q Do you have a sense of when Jamey relayed that to you?
A I don't, but I -- all I remember was that she had given notice. She had let Stephanie know.

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Q Do you have the impression that you found out about her giving notice shortly after she gave notice?
A I couldn't -- I couldn't answer that.
Q Okay. After you were informed by Jamey that Jen gave notice to Stephanie, did you immediately decide to go with Jen when she left?
A No.
Q How long after you became aware that Jen planned to leave Jonesworks did you make the decision to go with her?
A I think Jamey and I had a conversation about it. I think it was something that we immediately said, oh, this is something we have to figure out. Like -- because we had had Matthew at Jonesworks. But it was really just Jen and Matthew. And Jen had been with us pretty much since the beginning. So -- so it was one of those -- it was on the list of conversations that Jamey and I had to have. Like, whoa, what do we do? Do we stay? I didn't know what she was going to or where she was going at the time, but it was definitely a conversation. I just -- I don't think that was decided immediately.
Q At some point between when you found out

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that she had given notice and when she actually walked out the door at Jonesworks, you -- you had decided --
A Yes.
Q -- that you were going to go with her?
A Yes.
Q Okay. And you had decided that in consultation with Jamie and Tera?
A Yes.
Q Did you make Stephanie Jones aware of that decision when you decided it?
MS. SHAPIRO: Objection.
THE WITNESS: I don't even think we made Jen aware of that decision.
BY MS. SHAH:
Q Did you not?
A No.
MS. SHAPIRO: Objection.
BY MS. SHAH:
Q Okay. When did you make Jen aware of that decision?
A I -- I don't know. I don't remember telling Jen. Probably because I was never asked. I don't -- I don't know when I told Jen I would go with her.

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Q Did you ever tell Jen that you would go with her?
A I'm sure I did.
Q Personally?
A I'm sure I did, yeah.
Q Okay. Do you have any recollection of that?
A I think I do. I actually -- yes, I have a -- I have a recollection of a phone call with Jen.
Q And what is your recollection of that phone call?
A It was about one of the other thousand things that we were dealing with. And I let her know that Jamey had let me know that she was giving her notice or she gave her notice. My memory of that call was her saying, and being very clear, that she's sure that they will find someone great to replace her. It had nothing to do with us. And she wanted to make sure she stayed on for me because she knew how intense of a time this was for me, until the movie was done being promoted.
And she went out of her way to almost say, like, you know, everything is going to be fine. You know, Steph's great. Matthew's great. It was like that kind of conversation.

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Q Do you remember when in time this was?
A I don't, but I -- I imagine it was within a week or two of whenever Jamey told me.
MS. SHAPIRO: Counsel, can we take a short break?
MS. SHAH: Sure.
THE VIDEOGRAPHER: We're going off the record. The time is 4:21 p.m.
(Recess.)
THE VIDEOGRAPHER: We're back on record. The time is 4:48 p.m.
BY MS. SHAH:
Q Before the break, we were talking about a scenario planning document that you had received from TAG. Do you recall that? Oh, sorry. Almost. Try one more time.
Before the break, we were talking about a scenario planning document that you received from TAG?
A Yes.
Q Do you recall whether you ever received more than one version of that scenario planning document?
A I don't.
Q Do you recall whether it was updated or

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revised at any point in time?
A I don't.
Q Okay. To your best recollection, you only recall seeing one version of a scenario planning document; is that correct?
A I -- yes. Yes.
Q Do you remember that you didn't see any other versions or you just don't remember one way or another?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe I saw a second version.
BY MS. SHAH:
Q Okay. After you were provided with the scenario planning document, describe for me the series of events, to your recollection, in terms of how you came to hire TAG?
MS. SHAPIRO: Objection.
THE WITNESS: Forgive me.
Can you ask one more time?
BY MS. SHAH:
Q Sure. At some point after you received the scenario planning document for TAG, you ultimately hired TAG, right?
A The company did, yes.

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Q Yes. Is it your testimony that Wayfarer hired TAG?
A Yes, I believe so.
Q Okay. Do you have an understanding of whether you personally also hired TAG?
A I don't think I personally hired anyone.
Q Okay. And when Wayfarer hired TAG, what was your understanding of what TAG was being brought on to do?
A My understanding was that TAG was being brought on to be crisis public relations representatives.
Q Was -- to your understanding, was TAG given any instructions by you or by Wayfarer in terms of how to proceed once you had hired them?
A I believe so. I believe that Jamey was in communication with them.
Q And do you know what those instructions were?
A I can only speak to the instructions that I gave Jamey or at any time spoke to Jen or on the calls, which was to plan and to just try to get good press out there for the movie.
Q How involved were you personally in discussing with anyone at TAG the type of PR

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strategy you all should be employing?
A I don't know. I think I had ideas. I'm not -- I'm not sure how many conversations were happening versus what ideas I was sharing. I was kind of in and out.
Q Do you have any recollection of any ideas you had that you shared with TAG?
A I mean I really wanted to focus, not just TAG, but also Jennifer Abel, I really wanted to focus on amplifying the voices of survivors. I wanted to focus on the DV. I wanted to focus on the movie and not all of this speculation and drama.
Q Did you personally ever have any conversations with Stephanie Jones about the instructions that Wayfarer was giving TAG in terms of how to proceed?
A I don't think I had any real conversations with Stephanie Jones outside of texting through July and August.
Q Do you recall ever communicating with Stephanie Jones, whether on text or in conversation, about the instructions that Wayfarer had given TAG about how to proceed?
A I don't believe so. My memory of texts with Stephanie Jones were focused on letting her

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know that I was not a part of this decision to hire anybody. I wanted to stay out of it. It was too much for me. And I know she sent me a really beautiful message of love and support before the premiere. That's my memory of talking with Stephanie.

Q Okay.

A I think she was on vacation somewhere.

Q Do you have any understanding of whether anyone at Wayfarer had any communications, texts, conversations with Stephanie Jones about what Wayfarer was instructing TAG to do as crisis PR?

A I don't know.

MS. SHAH: Okay. Going to show you a document marked Exhibit 17.

(Exhibit 17 marked for identification.)

THE WITNESS: Should I get rid of this?

MS. SHAH: Yes. Thank you.

It's a text thread between Henny Grace, who is you, Jennifer Abel, Justin Baldoni, I think that's it. So this looks like a text thread between you and Jennifer Abel.

A Uh-huh.

Q -- on August 5th, 2024 with a Bates stamp Baldoni, several zeroes, 18710.

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Do you see this?

A I do.

Q Okay. And Jennifer Abel -- do you recall this text thread?

A Vaguely. But I know -- I know this was in The New York Times from what I was told.

Q Did you ever read The New York Times article?

A I did not.

Q How did you come to learn about it?

A The New York Times article?

Q Uh-huh.

A I would say it felt like minutes after I received an email, from who I believe was Mr. Gottlieb, I got an email from The New York Times saying they were running a story the next morning. And then the next morning, there were quite a lot of text messages from people worried about me and concerned. So that's -- that's how I learned about it.

Q If you never read The New York Times article, do you have any basis to say whether or not anything contained in it was true or untrue?

MS. SHAPIRO: Objection.

THE WITNESS: My understanding of The New

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York Times article was that it was taken from the CRD complaint. And I was never interviewed or asked for my opinion or my side of the story. So from the few sentences and the headline, that's what I was able to gather.

BY MS. SHAH:

Q What was what you were able to gather?

A That the information they got was from Ms. Lively's CRD complaint, but not from anything that came from me or my side of the story. Which -- and I would very much disagree with the things that Ms. Lively put in her CRD complaint as being untrue.

Q Okay. But sitting here today, can you think of a statement or portion of The New York Times article itself that you can identify as being true or untrue?

A I believe The New York Times article insinuated that I had launched a smear campaign against Ms. Lively, which is completely untrue.

I believe it said that I sexually harassed Ms. Lively, which is also very untrue. So there's two untrue statements.

Q Apart from those two statements or concepts as contained in The New York Times article, is there anything else that was contained in The New

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York Times article that, sitting here today, you can identify as either true or untrue?

A I would be happy to read it while we're sitting together and go through all the things that I feel are untrue but I don't know that that would be the best use of our time.

Q I agree with you, it would not be. So based on what you know about it to date, can you identify any other statement or portion of that article that you can identify as true or untrue?

A I can't comment on the rest of the article at this time.

Q Because you don't know what it said?

A Because I need to go through it to tell you what I think is true and untrue.

Q Okay. If you look at the document, Jennifer Abel starts by saying:

(As read):

"Sony is having a hard time with the word 'friction'. They think it will be taken out as clickbait."

Do you see that?

A Yes.

Q Do you have an understanding as to what she was referring to there?

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A I believe I do.
Q What is that understanding?
A I believe in an interview, I spoke that every set has friction. But oftentimes that friction ends up being something that is great for the film. And I think that's what she was referring to.
Q And did you understand that Sony did not like the use of the word "friction"?
A I believe that's what Ms. Abel was telling me in this text.
Q Okay. Did you have an understanding around this time that Sony had any other disagreements with things that you had said in interviews promoting the film?
A I don't know about disagreements. I know that there was always a conversation around how much of the film should be promoted. You know, using the word "survivor" or talking about domestic violence. And that had been a multi-year conversation.
Q And you thought more of that content should be used in promoting the film and Sony wanted less of that content to be used; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: Sony had initial

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apprehension about making it an issue movie. And I tried to explain to them that you cannot run from the fact that this is an issue movie. And this was the very reason I was making the movie. And it would be a disservice to all the people whose lives were changed from the film for us to pretend like that's not what the movie's about.
BY MS. SHAH:
Q Did Sony have ultimate approval over the film's marketing plan?
A I need to know what you mean by "approval".
Q Was Sony deeply involved in conversations with Wayfarer and the cast about the film's marketing plan?
A I believe there were many conversations that Sony was having about the marketing plan. They were in charge of marketing. They were the company that was paying for the marketing of the movie.
Q Okay. Then if you go back to this document.
A Yes.
Q Jennifer Abel says:
(As read):
"They obviously don't know about our

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strategy but let's stick to the words of 'challenge'."
Do you see that?
A Yes.
Q What is your understanding of what she means when she says "they obviously don't know about our strategy"?
A I think our strategy was to ensure that we were only saying positive things and not drawing any attention to what was very clearly at the time an intentional plan to draw attention to friction, if you will.
Q An intentional plan by whom?
A I can only imagine Ms. Lively.
Q And then you send Ms. Abel a text message where you say:
(As read):
"This is what we would need."
A Yes.
Q And you attach a screenshot of a post about Hailey Bieber's history of bullying many women.
Do you see that?
A Yes.
Q What did you mean by "this is what we

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would need"?
A So I believe at the time, we were going through scenario planning. And like any plan, you have Scenario A, Scenario B, C, D. What if -- what if this happens or this happens or this happens. And I think I had seen this post and I resonated with the word "bullying". And I sent it to Jen saying in the event that Ms. Lively came out and said lies about me, then we would need to come forward with the truth.
Q And was it your suggestion that you would come forward with allegations that Ms. Lively was a bully?
A It was my understanding that I would come forward with what my truth was. And I had felt very bullied.
Q Was it your intention to suggest that you should be coming forward with statements that Ms. Lively was a bully to other women?
A No. This had nothing to do with other women. This was just what this article was about.
Q And this article by its own words is about Hailey Bieber's history of bullying many women, right?
A Yes. I see that.

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Q Okay. And it was your suggestion that in some scenario where Ms. Lively was to come forward with what you felt were lies about you, you would want to come forward in the press with allegations like those contained in this post you sent?
MS. SHAPIRO: Objection.
THE WITNESS: No. Not exactly.
BY MS. SHAH:
Q So how would you correct that?
A So if Ms. Lively were to come forward with lies about me, then I would want to come forward with my truth. So it was about me and my experience. I don't know what this article was about, I actually didn't read it. I saw it. I saw the word "bullying".
At the time, I felt very bullied and scared and very alone. And we were planning for all the various things that could happen. That's why I said "would" as the operative word. This was a part of a scenario planning document and the hope was that the movie was going to come out and everything was going to be fine and everyone was going to have success, and we would never need anything. And that's the truth.
Q Is it your testimony that when you saw

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and sent this post to Jen Abel, you saw the word "history of bullying" but you did not continue to read where it said "many women"?
MS. SHAPIRO: Objection.
THE WITNESS: This had nothing to do with women. I'm actually -- I don't know if Ms. Lively has bullied other women.
BY MS. SHAH:
Q Did you read any press coverage that came out in August of 2024 that did accuse Ms. Lively of bullying other women?
A Later on, I did.
Q Women including Kjersti Flaa, I believe?
A I learned about that name, yes.
Q Okay. And women including Leighton Meester?
A From Gossip Girl.
Q Yes.
A I didn't read anything about her being a bully to Leighton Meester.
Q Okay. Are you aware that the article that Briana Butler Koslow testified under oath in this case, that she leaked and helped to plant in the Daily Mail about Ms. Lively, contained allegations that Ms. Lively had bullied Kjersti Flaa

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and had bullied Leighton Meester?
MS. SHAPIRO: Objection.
THE WITNESS: I was unaware of that. I also was unaware that she bullied Leighton Meester.
BY MS. SHAH:
Q And you were unaware of that even though that you here suggested to Jen Abel that what you would need in the event that Ms. Lively disclosed anything negative about you is articles similar to this one that says "Hailey Bieber's history of bullying many women"?
MS. SHAPIRO: Objection.
THE WITNESS: I disagree with the way that question was phrased.
BY MS. SHAH:
Q Do you think that's just a coincidence?
MS. SHAPIRO: Objection.
THE WITNESS: That what is?
BY MS. SHAH:
Q That you suggested that you would need articles about similar to Hailey Bieber's history of bullying many women and then TAG, the company that you employed as crisis PR, did in fact plant an article about Blake Lively bullying other women.
MS. SHAPIRO: Objection.

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THE WITNESS: So what is the question?
BY MS. SHAH:
Q The question is do you think that's a coincidence?
MS. SHAPIRO: Objection.
THE WITNESS: I don't think it's a coincidence that I felt bullied and then it seems the Internet dug up true stories of how Ms. Lively bullied other people. So it just shows that I wasn't the only one who was bullied.
BY MS. SHAH:
Q When you say "the internet dug up stories" what do you mean by that?
A It seemed like people came forward with their own experiences of being bullied to the extent that I never had to.
Q Okay. How does this fit in with the strategy that you were discussing with Ms. Abel and TAG about promoting positive coverage of the film?
A How does this fit in?
Q Uh-huh.
A This is part of a -- like I said earlier, a what-happens-if scenario.
Q So if positive doesn't work, then you would move to something like this?

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MS. SHAPIRO: Objection.
THE WITNESS: If positive doesn't work how?
BY MS. SHAH:
Q What do you mean when you say "this is part of a what-happens-if scenario"?
A As I testified earlier, if Ms. Lively were to capitalize on her threats that her and Mr. Reynolds made through her agent to my agent to me, and plant negative stories, which I was told she already was doing; such as I'm a part of a cult or that I'm a predator, and continued to come forward with lies, then we would have to have some sort of plan. As they are Hollywood titans and I'm very clearly a nobody as it relates or at least what they feel I am or what my former agency thought of me as I was also dropped very quickly per their request.
So we need some sort of plan if someone is attacking you with big guns and missiles and dropping bombs on you. In our day and age, you can't just die. I have a family I have to protect. I have a company that I started. So we were planning for what would happen if she were to attack me and to lie about me and hurt my reputation. That's all it was.

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Q And under that text where you send Jen Abel the screenshot of the article about Hailey Bieber, Jen Able responds:
(As read):
"Yes. I literally just spoke to Melissa about this on the break about what we discussed last night for social and digital."
And then she says:
"Focus on Reddit, TikTok, IG."
Do you see that?
A I do.
Q Okay. She mentions "what we discussed last night for social and digital". Is that a discussion that you were a part of?
A I have honestly have no idea what she's talking about here so I don't think I was a part of that call. I don't think she's inferring that her and I discussed anything.
Q Did you and she discuss anything about this?
A Not that, no. Not like that. I don't remember any conversation with Jen about this.
Q Do you recall any conversation with Jen or Melissa about social or digital strategy?

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A No. I was very hard to reach during this time. I -- most of my communication was via text, which the world has.
Q Do you understand what the words "social" and "digital" mean in that context?
A I would have assumed they mean the same thing, so I don't know. I still don't know the difference between social and digital because social is inherently digital. So I don't know.
Q Do you understand that "social" means social media?
A Yes.
Q Okay. On the internet?
A Hence, it's digital, which is what I meant with what I said. Like, social media is digital, so I don't know what digital is.
Q Did you understand that social and digital included things like Reddit, TikTok, and Instagram h?
A I didn't know anything about Reddit. But I would assume that include TikTok and Instagram.
Q Okay. Do you recall ever having a conversation with either Jen or Melissa after you sent this Hailey Bieber post where you explain to them that you didn't mean planting stories about

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Blake bullying other women, you meant coming forward with stories about Blake bullying you?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember any conversation. I know Jen and I were together doing press somewhere around this time, and I know Jen knew it was very clear that I wanted to do nothing that would harm Ms. Lively or this film. And that the only times we would only do anything are -- is if we were attacked. And we were attacked, and we still didn't do anything.
BY MS. SHAH:
Q Okay. But do you ever -- do you recall ever having any communication with either Jen or Melissa where you explain to them when I sent you this post about Hailey Bieber, I wasn't suggesting stories about Blake bullying other women, I was suggesting coming forward with my experience about Blake bullying me?
MS. SHAPIRO: Objection.
BY MS. SHAH:
Q Did you ever explain that to them?
MS. SHAPIRO: Objection.
THE WITNESS: I think it was very clear in my relationship with Jen that she knew exactly

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what I meant when I sent this. And that there was never a directive to do anything. So I would be very surprised if anything was actually done.
BY MS. SHAH:
Q But do you recall having any conversations or communications with her or Melissa where you expressed that?
MS. SHAPIRO: Objection.
THE WITNESS: That specific thing?
BY MS. SHAH:
Q Yes.
A I don't have any -- any specific recollections of that.
Q Okay. When Jen says:
(As read):
"I literally just spoke to Melissa about this on the break about what we discussed last night for social and digital."
Do you have any understanding about what was the substance of Jen's conversation with Melissa on this topic?
A I wasn't on the call so I don't know.
Q Is this the only idea that you ever expressed to either Jen or Melissa or anyone at TAG

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about how you might combat stories that Blake and Ryan might come forward with that you believed were lies?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know. I'm not sure.
BY MS. SHAH:
Q Do you recall discussing the potential around stories that Blake and Ryan crossed the picket line or otherwise violated the writers' strike by rewriting certain scenes in the movie?
MS. SHAPIRO: Objection.
THE WITNESS: I think I do. Yes.
BY MS. SHAH:
Q Okay. Do you recall communicating to Jen and Melissa that one idea might be flipping the narrative on Ryan to make it seem like when he rewrote the rooftop scene in the movie, he was mansplaining how to write a script to a female scriptwriter?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember exactly what you said, no.
BY MS. SHAH:
Q How do you remember it?

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A I remember that an article came out -- or essentially, it was like a source said that Ryan thought the script was a disaster and that he had to save it. So they were putting out articles that were basically saying that the film was a mess and he had to come in and save it. And I believe we had learned at the premiere -- at least I had learned -- the following day, I was doing an interview, and I was told that Ms. Lively said that Mr. Reynolds wrote the rooftop scene, which was news to me as the director.
And in the moment, instead of saying that didn't happen to the people/person, I just said how great Ryan was. I didn't -- again, I didn't want to say anything to contradict that. But there was already an existing narrative that was out there.
And so I do remember passing on a message from my partner who had suggested something to that effect, because, essentially, if the script was a mess, then he would be saying that the writer, who was a female who worked her ass off for years on this to get it right, clearly didn't know what she was doing. Which I completely disagreed with.
So flipping a narrative was meant an existing narrative that was already being put out

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by, I would say, the other side.
Q What did the fact that the writer was a female have anything to do with any of that?
A Well, again, I was passing on a text message from my business partner who was suggesting flipping the narrative.
Q Before we leave this Exhibit 17, I may have asked you this before, but for the record, do you have any recollection of discussing any of this scenario planning that was going on that we were just talking about with Stephanie Jones?
A I don't have any recollection of talking with Stephanie Jones about scenario planning.
MS. SHAH: Okay. This one, please.
BY MS. SHAH:
Q Are you aware of whether anyone at Wayfarer ever had any conversations with Stephanie Jones about the type of scenario planning that you were discussing with Jen Abel and TAG?
A I'm unaware.
MS. SHAH: Okay. I am handing you what's been marked as Exhibit 18. It's a text thread between you, Melissa, and Jen Abel dated August 15, 2024. Bates-stamped Nathan, underscore, several zeroes, 4562.

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(Exhibit 18 marked for identification.)
BY MS. SHAH:
Q Is this the idea from your partner, Steve Sarowitz, about flipping the narrative that you were just testifying discussing flipping the narrative about?
A Can I have a second to read it, please.
Q Of course.
A Okay.
Q So is this the substance of the idea that you were just talking about that came from your partner, Steve Sarowitz, about flipping the script?
A Yes.
Q And that included flipping the script from Ryan saying:
(As read):
"Script was a disaster and he saved the movie, to something about Ryan claiming the female hired was a feminist writer, didn't know how to tackle a female film etc."
Do you see that?
A Yes.
Q This idea that this was a female writer and a female film and that what Ryan Reynolds was

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saying was essentially misogynistic, did that come from Steve Sarowitz?
MS. SHAPIRO: Objection.
THE WITNESS: I think I said here that my partner, Steve, has asked about this. So I was passing that along.
BY MS. SHAH:
Q So this idea, something about Ryan claiming the female hired was a feminist writer, didn't know how to tackle a female film, etc., came from Steve?
A That was what was passed on to me.
Q Did you use any judgment about whether or not that was a good idea before you passed it along?
MS. SHAPIRO: Objection.
THE WITNESS: I think it's implied in him saying the script was a disaster, so I just pass it along. I didn't disagree with him.
BY MS. SHAH:
Q You didn't disagree with Mr. Sarowitz's idea? Is that what you mean?
A I didn't disagree with what Mr. Sarowitz was -- was saying in terms of what Ryan was inferring when he called the script a disaster.
Q Meaning, that Ryan was essentially acting

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misogynistically?
MS. SHAPIRO: Objection.
THE WITNESS: One could infer if he's saying the script was a disaster.
BY MS. SHAH:
Q And one could infer that simply from the fact that it was a female writer who wrote the script?
A And a female author, female writer, and yeah.
Q Did you rewrite any portions of the script that the female scriptwriter wrote?
A Did I rewrite any portions of the script? Along with Ms. Lively, I did, yes.
Q Do you think that it can be inferred from that that you were acting misogynistic because it was a female book author and female script writer and you were a man who was tinkering with that script?
MS. SHAPIRO: Objection.
THE WITNESS: I wish I didn't tinker with that script, but I had no choice.
BY MS. SHAH:
Q Okay. And then it goes on to say:
(As read):

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"And the fact they saved the script from what they think is a disaster after we had a green-lit script and was a WAS strike basically implies they were scabs."
Do you see that?
A Yes.
Q And then, if you flip the page you write:
(As read):
"Which we should 100 percent lead them to."
Do you see that?
A Yes.
Q That last part, "which we should 100 percent lead them to," was that your idea, or were you still relaying what Steve meant?
A I -- I don't know.
Q When you say "which we should 100 percent lead them to," do you mean lead reporters to?
A I actually don't know what I mean here.
BY MS. SHAH:
Q What is your best guess?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know.

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BY MS. SHAH:
Q No idea?
A I don't know what I meant.
Q Okay. And then you write:
(As read):
"It's a man coming in to say this female writer sucks and I need to save it. Let him drown in his own pool."
Do you see that?
A Yes.
Q Is that the sum and substance of the idea that you were relating?
A Which part, the pool part or the other part?
Q All of it.
A It seems to be that way, yes. In other words, this is something that he created. Like he came out with a story about this in the first place. This was not something that we came out with and wanted to talk about.
Q Okay. And are you, essentially, saying here that because he came out with this story, let's flip it against him and make him look like a misogynist?
A I think that's -- those are your words.

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Q I'm asking if you agree with that interpretation and that idea?
A I don't believe I do.
Q You don't think that the idea that Mr. Sarowitz was relaying was because they came out with this story, let's flip it against them and, essentially, make Ryan look like a misogynist?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe we had to make Ryan look like a misogynist.
BY MS. SHAH:
Q That wasn't my question.
MS. SHAPIRO: Objection.
THE WITNESS: That was my answer.
BY MS. SHAH:
Q Okay. Do you disagree with the interpretation that the idea that Mr. Sarowitz was relaying was because Ryan had come out with a story about rewriting that scene, you should use his words against him and make him look like a misogynist?
MS. SHAPIRO: Objection.
THE WITNESS: I disagree with what you said because I don't know of a story that came out about Ryan rewriting a scene.

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BY MS. SHAH:
Q What basis did you have to believe at the time that Ryan Reynolds had actually said the things that were being reported about here that you're discussing?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure.
BY MS. SHAH:
Q You can't remember what basis you had to think that he actually said these things?
A I believe there were many articles that were coming out about how he saved the movie.
Q Do you believe that the press is always accurate?
MS. SHAPIRO: Objection.
THE WITNESS: Are you asking me now or then?
BY MS. SHAH:
Q Both.
A I think, as I sit here today, the press is very inaccurate oftentimes. I think, at the time, I might have had a more optimistic view of the press.
Q Did you essentially take those articles at their word?

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A I don't know.
Q Okay. Other than the reporting that was going on at the time about what Mr. Reynolds or Ms. Lively had said about this, do you have any other basis to understand what they had actually said?
A I'm not sure.
Q Okay. Was this also part of this scenario planning that you were discussing?
A I am unsure.
Q How does flipping the narrative in the way that is suggested here reconcile with the view that you should be putting out only positive stories?
A Because it has to do with a defensive measure. So if we're talking about something that was an offensive measure, then flipping an existing narrative would not be us doing anything offensively. It would be us defending. And again, this was me passing something on.
Q Do you recall testifying earlier about whether Melissa Nathan ever encouraged you to leave Jonesworks with Jen Abel when Jen Abel left?
A At this point, I remember some of that, and I would love for you to refresh my memory more.

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MS. SHAH: Sure.
THE WITNESS: Am I passing this one on?
MS. SHAH: Yes. Thank you.
I'm handing you what has been marked as Exhibit 19. It's a text thread between Melissa Nathan and Jen Abel, dated August 19th, 2024. And I just want you to read the first page, if you will. You can read the rest of it, but I'm only going to ask you about the first page.
(Exhibit 19 marked for identification.)
THE WITNESS: Okay.
BY MS. SHAH:
Q Okay. And at the top, Melissa writes:
(As read):
"Just had a nice conversation with Justin. Just him and me. I explained to him a few things."
And then she goes on to explain what she explained to you. And then she says:
(As read):
"I ended it with, and I'm just going to step out of line before I go to bed and tell you, Jen is amazing. She's so loyal. She loves you so much, and you

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have to go with her. And he was like, oh my God, of course, of course I'm going with her."
Do you see that?
A I do.
Q Do you remember having that conversation with Melissa Nathan?
A Very vaguely.
Q What do you remember about that conversation?
A I remember it was mostly about, like I was thinking I was -- like, she had had a conversation with Leslie Sloane, which I found shocking because -- I just found it very surprising. And she said it was actually -- I think she said it was a nice conversation, and then I just remember a brief exchange at the very end. But I wouldn't -- I wouldn't characterize it the way she is saying it.
Q How do you remember that part differently?
A I remember her saying how much Jen cares about me, but I don't remember her ever saying you have to go with her or egging me on or anything like that, because I was already -- I was already planning on following her wherever she was going.

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So there was no, like -- this -- if I may, this, to me, looks like more of what I've seen you show me, which is like an exaggeration or inflation of conversations. Maybe her trying to, like, show Jen she has her back. I don't know, but that wasn't what the conversation was exactly.
Q Okay. We discussed this a little bit earlier, but what was behind your decision to leave with Jen Abel when Jen left Jonesworks?
MS. SHAPIRO: Objection.
THE WITNESS: It wasn't any one thing. I think the major thing, it would have been like if I was at William Morris -- maybe I should use a different agency. If I was at an agency and I had an agent for four years or five years and I talked to that agent every day and that agent was soliciting work for me, and the agent called me and said, hey, I'm going to a different agency. My loyalty would be with the agent that I had built the relationship with versus the agency. And that's how I viewed the situation with Jen and Stephanie Jones.
Even if I had a great relationship with the owner of the agency, my day-to-day relationship was with Jen Abel.

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BY MS. SHAH:
Q And is what you just relayed to me the reason that you personally decided to go with Jen Abel when she left Jonesworks?
A Yes.
Q And is what you just relayed to me consistent with the reason that you, Jamey Heath, and Tara Hanks collectively made to go with Jen Abel when she left Jonesworks?
A I think that's the biggest -- the biggest reason. I think we were -- regardless of anything that was happening with the movie or not with the movie. If there would have been no movie, I think that would have been the decision.
Q I don't understand that answer. What do you mean by that?
A Maybe it's because I didn't understand the question.
Q Sure. You said that you discussed with Jamie Heath and Tera Hanks this conversation around whether you -- you personally and Wayfarer the studio, should go with Jen Abel as your publicist --
A Yes.
Q -- when she left Jonesworks, right?
A Yes.

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MS. SHAPIRO: Objection.
BY MS. SHAH:
Q And the three of you collectively made a decision around what to do, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MS. SHAH:
Q Is what you just described to me that you felt, you know, a loyalty to your relationship with Jen as your agent versus the owner of the agency?
A I don't know if I would --
MS. SHAPIRO: Objection.
THE WITNESS: -- characterize it as a loyalty.
BY MS. SHAH:
Q Okay. Sure.
Did you and Jamey and Tera ever discuss any other reason to go with Jen Abel when she left Jonesworks other than what you just described to me?
A I think what I just described to you is the majority of the reason. I think that there were other micro reasons, but -- but that wasn't the main reason.
Q What were the other micro reasons?
A It was what we talked about earlier.

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The -- just the feeling I got when I had spoken to Steph, Mrs. Jones -- sorry -- during that time with the article and all of that that was going on. Also, just I -- I didn't speak to her very much. Jen was really my point person, or Matthew. It would be like if I was your client. You're a wonderful lawyer and you've been with me -- I'd been your client for four years, and you left your firm to join -- to join Mr. Freedman. And -- and your firm might be great, but I would want to go with you. I mean, that was really the decision.
Q Okay. Is it fair to say that your working relationship with Jen never really changed or was interrupted when she left Jonesworks?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know how to answer that question.
BY MS. SHAH:
Q Okay. You -- you continued to work with Jen Abel as your publicist the day after she left Jonesworks, right? And in the week after she left Jonesworks and the month she left Jonesworks?
MS. SHAPIRO: Objection.
THE WITNESS: My recollection of her leaving Jonesworks was -- was her phone being

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confiscated and her being met with, like, security and an attorney, and she had been, like, texting me from, like, another number and trying to get her phone. So from that point on, I know we were still dealing with the premiere, we continued to work together. But there was a gap when she didn't have a phone, and I think she was going through a lot.
BY MS. SHAH:
Q But that gap was a matter of hours or a day; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: Probably. But -- but I believe that my -- if my memory serves me correct -- and I could be wrong -- I was told that she would be staying on with me and Wayfarer until the end of the press cycle. There's like a date. And I -- I believe that this incident happened still while we were within that date. So it was my understanding that she was fulfilling her promise to us.
BY MS. SHAH:
Q Did you ever feel like she was ever unavailable to you as a publicist during this period of time?
A I'm not sure that's something I thought about.

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Q Is she still your publicist?
A I think so.
Q Is she currently Wayfarer's publicist?
A I don't know. I -- maybe. I don't know what we're paying her if -- I don't know any of those details.
Q Did you have anything to do with any contractual relationship between Jennifer Abel or her agency, RWA, and Wayfarer or you yourself personally?
A No.
Q Okay.
MS. SHAPIRO: Counsel, can we take a break?
MS. SHAH: Sure.
MS. SHAPIRO: Ten minutes?
MS. SHAH: Yeah.
THE VIDEOGRAPHER: We are going off the record. The time is 5:41 p.m.
(Recess.)
THE VIDEOGRAPHER: We're back on the record. The time is 6:11 p.m.
BY MS. SHAH:
Q Okay. I want to talk about the period of time while you were filming It Ends with Us. And I

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want to talk about conversations that you had directly with Stephanie Jones during the filming.
A Okay.
Q Do you recall any conversations that you had directly with Stephanie Jones during filming?
A I remember she came to visit me on set, which was lovely. Outside of that, I can't recall any moments right now.
Q Do you recall any calls that you had with her during filming where you were concerned or upset about any incidents that had happened on set?
A Right now, I -- right now, I don't.
Q Is it possible that there may have been calls between you and her during filming that you just don't recall right now?
MS. SHAPIRO: Objection.
THE WITNESS: May I ask a clarifying question?
BY MS. SHAH:
Q Sure.
A Do you mean just me and Stephanie Jones?
Q No. I mean between you and Stephanie Jones, whether or not there were other people on the call.
A Oh. So then I misunderstood.

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Q Oh, sure. Okay.
A I do remember a call with me, Stephanie Jones, Jen Abel, and, I believe, Jamie Heath, and myself.
Q Okay. Tell me what you remember about that.
A I remember -- I don't remember when it was. I remember giving them an update on what my experience was like filming the movie. I remember sharing some of the -- some of the moments of conflict that I had with Ms. Lively, just how difficult this movie was. I don't remember it being a long conversation. I remember her responses. I don't remember how long the conversation was.
Q What do you remember about her responses?
A I remember laughing because she got very protective of me and said things that I will not repeat on camera about Ms. Lively and things she's heard about her and Mr. Reynolds. And she talked about a lot about Mr. Reynolds and how terrible he was. And she kind of like was acting like a momma bear. Don't mess with -- and -- and I remember that because she was approaching it like she's been around for a long time so she knows the inside scoop. She's been a publicist for so long, and I

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think she represented The Rock. And she had said on that call that Mr. Reynolds had, like, terrorized The Rock or something to that extent. Something about a -- something about a letter. I don't remember the details but something about, like, he had written a letter and it was, like, they wouldn't do press together. I don't know. She was -- it was a lot of gossip. But that's why I remember laughing because I was just like, oh.
Q Did you feel supported by her on that call?
A Yeah, as I said earlier, it kind of felt like, oh, don't worry. She's this and that. It will be fine. The movie's going to come out, and it will be awesome. And everybody's had a bad experience with her. It was like that kind of call.
Q And did you feel like she believed what you were relaying to her about your experiences on set?
A Yes. I don't remember sharing much, but what I did share, I just shared the truth. And she -- yeah. Yeah.
Q What do you remember sharing with her about your experiences on set?
A I specifically remember sharing the

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situation with our trainer and -- and asking him about what he thought Ms. Lively might weigh when we shot the scene where I had to pick her up, because of my back. And how then they confronted me the next day and how this trainer evidently then went and told her that I was asking about her weight or something. And then how that became this big thing. And they sat me down, and I just remember her kind of not being able to believe that that was even a thing.
I -- I believe I shared with her that I -- I had made a comment about the way Jenny Slate looked in her wardrobe. And then I used the word "sexy," and I think she started responding by joking about how -- again, I'm not going to -- I don't want to, if it's okay, repeat the words that she said -- but describing, generalizing the women and their fragility. And then I shared -- I think I talked about the wardrobe, how hard it was with the wardrobe. And just that it felt like it was just a very hard experience. Like, that's kind of what I remember.
Q Do you remember sharing with her any -- anything else regarding your experiences on set in that call?

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A I remember sharing how proud I was of the movie but that it was just really hard. But that I was, like, really proud of the work. We hadn't talked in a long time, so it was kind of like a, like -- I hadn't talked to Jenn either. It was just like a check-in about everything.
Q Do you recall sharing with her anything else about the conflicts that you were having with Ms. Lively on the set?
A I don't -- right now, I don't recall.
Q Do you recall how that call came about?
A No.
Q Do you know whether you had asked for it?
A I don't.
Q Okay.
Do you recall her providing any guidance to you around being more sensitive to the optics with a woman like Ms. Lively who had just given birth with respect to the weight question or anything like that?
MS. SHAPIRO: Objection.
THE WITNESS: No, the opposite. She was very -- she jumped right in to putting Ms. Lively down and talking about her reputation.

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BY MS. SHAH:
Q Did you record that call?
A No.
Q Do you know if Jamey recorded that call?
A I don't.
Q Do you know if Jen Abel recorded that call?
A I don't.
Q Do you think she had any reason to disbelieve what you were telling her on that call?
A I can't speak to what she might believe or not believe.
Q Do you recall whether or not she had recently had major surgery within the week or two before that call?
A I remember her having surgery, and I don't remember what the surgery was, but anytime someone in my life has a surgery, I would always reach out. And I'm very into, like, health, and I have a health coach -- or had -- and biohacking and things. So I -- I think I probably reached out and offered if there was any way I could be of service to her.
Q Do you recall any urgency around getting on the phone with her from your side to discuss

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these issues with her?
A Like I said, I really don't remember the context or when the call was or anything like that.
Q Okay. Other than this one call that we've been talking about, do you recall having any other calls with Stephanie Jones during filming, whether or not there were any other people on it?
A I don't.
Q Do you recall -- are you sure that you didn't have any other calls, or you just don't remember one way or another?
A I have no memory of any other calls, but if you, like, have a phone log where we talked or something, I would be happy to change that. I just don't -- I don't have any memory of another phone call with Stephanie. It was -- I mostly spoke to Jennifer Abel, and I didn't speak to Jennifer Abel very often during the filming.
Q How often would you say you spoke with Jennifer Abel during the filming outside of the presence of Stephanie Jones?
A Only if there was something that she wanted me to promote or if there was anything that we were doing for the movie. But I don't have any specific memories right now.

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Q Do you recall ever having any conversations with Jennifer Abel outside the presence of Stephanie Jones where you relayed to Jennifer Abel anything about your on-set experiences or difficulties you were having with Ms. Lively during filming?
A I don't -- I don't remember.
I feel left out of the note-taking.
Q Sorry?
A I'm just joking.
Q You previously -- I don't know if you still do -- hosted a podcast called Man Enough; is that right?
A That is correct.
Q What is the conception behind the Man Enough podcast, in your own words?
A What is the conception, meaning how was it conceived?
Q Sure. Let's start there.
A The Man Enough podcast was originally going to be an accompanying podcast to a book that I had released years ago called "Man Enough."
Q And what was that book about?
A That book was about my own journey to redefine and undefine what masculinity was for

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myself.
Q And can you describe that journey for me briefly here?
A Do you want me to describe my whole book journey briefly?
Q Is it possible?
A I'm happy to try. I just don't know what "briefly" is.
Q I'm just trying to understand, what was the idea behind that book and the podcast?
A Well, the book was really a self-exploration of looking at all the unconscious messages that I've taken on as a man but, more importantly, as human in my life -- all the mistakes I've made, the social constructs and kind of invisible scripts that I maybe have been living by that I wasn't even aware of -- and putting them in a form that I was hopeful could help other men.
And the podcast, I think was -- to answer your question -- was a way to have a conversation around those same topics that, oftentimes, were uncomfortable so that we could have something for men outside of -- outside of the book.
Q Did the book or the podcast deal with notions of toxic masculinity? Was that part of it?

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A I actually say in the book that I don't like to use that phrase "toxic masculinity," so I will answer your question "no." But I think that would be more of a perception based on who was listening.
Q What phrase do you prefer than "toxic masculinity," or why do you not like using that phrase?
A As I wrote about, I think that the phrase "toxic masculinity" was inherently divisive. I believed it became political, and a lot of men felt attacked by the use of the word. And I didn't feel that it made any sense to use a term that would immediately make men defensive, especially because those were the very men that I wanted to reach. And I also don't believe that masculinity is inherently toxic. I never have. I was very proud to be a man. I never felt like I needed to apologize for being a man, and I know that was -- that was something that was going around a lot with the phrase "toxic masculinity."
And that said, there were a lot of people that maybe kind of lumped in this idea that because I was doing a podcast and writing a book about masculinity, that I was saying that masculinity was

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toxic. But generally, those were people that didn't read my book or listen to the podcast. I just wanted to help men and help men embrace all the parts of them that made them human. And that also means the stuff that sucks and that you never want to look at and that maybe you've been hiding or you don't even realize you're hiding. And it was just about confronting those parts of ourselves and just holding ourselves accountable to try to be better men.
Q What are some --
A I'm sorry. That wasn't very brief.
Q It's all right. And you'll forgive me if I'm using the wrong terminology around this stuff, but feel free to use whatever you think are the appropriate words. But you said --
A A lot.
Q Yeah. When you said "the stuff that sucks that you never want to look at or maybe you've been hiding or you don't even realize you've been hiding," can you give me some examples of what kind of "stuff" you're talking about?
A Sure. I mean, a lot of men deal with shame. A lot of men -- I mean, suicide among men is increasing yearly, and many more men take their own

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lives than women. And there is a belief in -- and I don't say this as an expert, this is just from my own research and experience. There's a belief in this specific world that this happens because men don't have a support system, because men have been taught to not share their pain and their trauma because it's oftentimes used against them and weaponized against them by both men and women. So an example could be a man that was abused as a child who never spoke to anybody about it.
In this case, I will give you an example of a man that was maybe abused by an older man, but this man identifies as being heterosexual. But because he was abused by an older man, struggles with the abuse itself and being taken advantage of. But also the fact that he was abused by a man, he's also questioning his sexuality or his gender. And also, there is a preconceived notion that as a man, you don't want to go to therapy because it makes you less of a man.
So perhaps this man didn't get the help that he needed, and he was, as we say, suffering in silence. And he didn't know who to reach out to. And instead, that man took out all of these feelings of shame and unworthiness and confusion about what

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happened to him and blamed himself and would take that out on other people -- maybe other men, maybe other women, maybe this man himself became an abuser. And the whole idea is that this is something that as a man, you would find embarrassing and shameful because it's not something that is socially accepted or acceptable to talk about.

So the hope was to normalize getting the help you need to normalize vulnerability. Let men know that they're not alone. And that there is all kinds of examples of these types of things. I'm happy to name another one if you want me to. And again, this is just a hypothetical man. And many of these men end up eventually taking their own lives, and that breaks my heart, and hurting women in the process, which also breaks my heart.

Q Did any of your work on the podcast or in this book around this idea of "Man Enough" have to do with gender norms or gender relations as between men and women?

A I mean, I think the entire book was inherently about gender and masculinity specifically. But as I said in the book, I'm not an expert and the book was much more my personal journey in trying to use as many anecdotes and

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stories that I could find in my life to point men to a -- to a direction of maybe them being able to look at themselves. I'm sure some of that was -- it was discussed either on the podcast or in the book as just it's a -- like, this is a large, large conversation. And my book was meant to be just a tiny little piece of a personal journey meant for -- mostly meant for men. But as we know, many women read it and then gave it to their men.

Q Have you seen reporting around you that identifies you as an ally of women or a feminist ally?

A I would say so, yeah.

Q Do you believe yourself to be an ally of women or a feminist ally?

A I certainly have attempted to be.

Q You're aware of the Me-Too movement, I'm assuming?

A I am.

Q Are you aware of an idea that came out of the Me-Too movement that one should believe women, both believe women when they speak out about misconduct against them?

A Yes, I'm aware.

Q Do you agree with that idea?

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A I think that is a very nuanced question that I can't give you a yes-or-no answer to.

Q Are you aware of something called the He-Too movement?

A No, but I could imagine what it is.

Q It's, essentially, a response to the Me-Too movement about men who believe they've been falsely accused by women of misconduct.

MS. SHAPIRO: Is that a question?

THE WITNESS: Oh, then I -- then, no I don't know what -- I don't know what that is.

BY MS. SHAH:

Q Okay. What did you think it was?

MS. SHAPIRO: Objection.

THE WITNESS: I actually thought it was like "him too," like he also has been sexually harassed or sexually assaulted. Because oftentimes, people think men can't be sexually harassed or assaulted and that it's only women. But I think that if we're talking about equality, it's important to create room for men to be able to share their experience of sexual harassment or assault. Because I believe one in five men have been sexually assaulted, which is a pretty big number. But again, not as an expert, just something that I've read. So

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that's what I thought you were meaning about "him too."

BY MS. SHAH:

Q Are you aware of -- or have you been following a lot of the commentary about you on social media since this lawsuit began, in general?

A I have had very long breaks where I didn't. And then there have been times I feel like I need to know what's happening and I go look. Unfortunately, people don't necessarily respect boundaries, and people send me lots of things, so I have to constantly ask people to not send me things. But there have been many months where I have not been following. And then there's been months where I have.

Q Have you seen that, online at least, you've become, in certain circles, kind of a hero or a figurehead of the MAGA movement?

A No. I don't mean to laugh, but I --

Q You've not seen anything like that?

A No, I didn't -- I didn't know where you were going with it, but I didn't think you were going with that.

Q All right. I'm not going to ask you about your political affiliation.

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A I don't have a -- I don't have a red hat.
MR. BACH: You've asked about everything else.
MS. SHAH: I don't care about that one.
THE WITNESS: Am I -- is that true? That's all right. You just surprised me there.
MS. SHAPIRO: Can I -- time out. How much time do we have left, Mr. Videographer?
THE VIDEOGRAPHER: We're at six hours and 40 minutes.
MS. SHAPIRO: Is that all? Are you sure?
THE WITNESS: I'm sorry.
BY MS. SHAH:
Q So you've not seen the legions of MAGA supporters who have come out in support of you on social media?
A No.
Q Okay.
A That's very surprising.
Q And you're not aware that you have a very pro-MAGA fan base on social media?
A You're making me aware. Are these like the "Make America Great Again" red hat people?
Q That's what I mean, yes.
A Is there anything you want to show me

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that's like...
Q Not right now, no. I just didn't know if you had been following this during the course of this lawsuit.
A Maybe I should. That's a...
Q Are you aware that on social media you've also become, to some, like a poster boy for the He-Too movement, meaning the --
A As I said, I wasn't aware of what He-Too meant.
Q And by "He-Too," I mean a movement around the idea of men being falsely accused of sexual misconduct by women?
A So was I aware that I was a poster boy for the He-Too movement?
Q Uh-huh.
A I was not.
Q Okay.
A As I said, I didn't know what -- I thought He-Too meant something else.
Q Other than the term "He-Too," are you aware that during the course of the lawsuit, you've become kind of a hero or poster boy for this idea of men being falsely accused by women?
A No. "Hero," it's a very strong word.

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MS. SHAPIRO: Looks like you're on your last page. You don't have to use all seven hours, you know.
THE WITNESS: We're here.
BY MS. SHAH:
Q Do you know what the "manosphere" is, if I use that word?
A I do know what the manosphere is. That is one I do know.
Q What do you understand by that term?
A The manosphere, to my understanding, is -- it was like an alt-right movement that took place on or in parts of the web, which I don't know. Maybe Reddit or some places that -- that kind of bred this idea that men are victims and created, I don't know the exact term, but like these cells of men who would, like, take out their anger on women.
Q Are you aware that during the course of these lawsuits, you've also become kind of a hero to the manosphere?
A I'm learning all kinds of new things today; so, thank you.
Q I can see that.
A No. I don't know where the manosphere is, nor do I know where to find that information.

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But I hope that people in the manosphere, if they do think of me as a hero, would then go read my book. Because I think that could then maybe -- I always wanted to get the book into the manosphere. This is a weird way to do it. And I don't mean that like as a joke. Like, that was always a thing that we had talked about, is how do we -- how do we reach the men in the manosphere. So maybe -- maybe God is laughing right now.
Q Is the manosphere a movement that you want to be associated with?
MS. SHAPIRO: Objection.
THE WITNESS: I think I just answered your question. No. I'm not meaning to laugh at you. It's just, no, absolutely not. Like I said, I absolutely would want them to read my books and give my book for boys to their young boys. Because all of my work is about helping men actually do the opposite of my understanding of what the manosphere is, which is to not take your anger and aggression out that you have in the world, out onto women and the women of your life. And to go to therapy and to not harbor that anger and that resentment and to get it out of your body. And to, yeah, so -- so maybe some good will come out of this if they are reading

my stuff.
BY MS. SHAH:
Q Do you know whether, during the course of the lawsuit, anyone on your team has been stoking these constituencies in your favor on social media?
MS. SHAPIRO: Objection. And I don't -- I'm just going to instruct you not to provide any information based on what your lawyers have communicated to you.
THE WITNESS: That's okay. My lawyers haven't told me anything. I didn't know anything about it.
BY MS. SHAH:
Q So you're not aware one way or another whether anyone on your team has been stoking these constituencies that I've mentioned in your favor on social media?
A I don't know where I would even find the manosphere; so, no.
Q Do you think Jed Wallace can find the manosphere?
MR. BACH: Come on. We got six hours and 45 minutes. If you have real questions, ask them, but this is silly.
THE WITNESS: I have no idea.

MS. SHAH: One defendant per deposition, please.
MR. BACH: One defendant but one person sitting here late at night, wondering what you're doing here at this point. You're just improvising.
MS. SHAH: All right. That's enough. That's enough. I'm going to go off the record if you continue to eat up my time.
MR. BACH: Go ahead.
THE WITNESS: I'm happy to answer your question. I don't know anything about what Jed Wallace knows or where he could find the manosphere.
MS. SHAH: Okay.
BY MS. SHAH:
Q What do you know about what Jed Wallace does?
A I know he's very good at compiling information and then sending it, as I believe I testified to earlier. I know he can help. I had -- I've had people call me and, like, threat -- like, leave me threats. I've had death threats. So I know that he knows people in security, so he was able to help me get security.
I know that he loves his family a lot. I

know that he had a -- I think he had a health scare, but I don't know much about what he does or what he can do.
Q Have you read Ms. Jones' lawsuit in this case?
A I haven't.
Q Okay.
MS. SHAH: I think that's all I have for you.
THE WITNESS: Thank you.
MS. SHAH: Thank you.
MS. SHAPIRO: This marks the conclusion of today's deposition. We are going off the record. The time is 6:46 p.m.

(WHEREUPON THE DEPOSITION CONCLUDED AT 6:46 p.m.)

CERTIFICATE OF DEPONENT

I have read the foregoing transcript of my deposition and except for any corrections or changes noted on the errata sheet, I hereby subscribe to the transcript as an accurate record of the statements made by me.

_____
JUSTIN BALDONI

SUBSCRIBED AND SWORN before and to me this ____ day of _____, 20___.

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My Commission expires:

REPORTER'S CERTIFICATE

I, ASHLEY SOEVYN, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was put under oath by me;

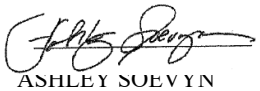
That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That a review of the transcript by the deponent was/ was not requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 7th day of October 2025.



ASHLEY SOEVYN
CSR No. 12019

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
---oOo---

BLAKE LIVELY,
Plaintiff,
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)
25-CV-449 (LJL) (MEMBER CASE)

WAYFARER STUDIOS LLC, ET AL.
Defendants.

JENNIFER ABEL,
Third-party Plaintiff,
vs.
JONESWORKS, LLC,
Third-party Defendant.

WAYFARER STUDIOS LLC, et al.
Consolidated Plaintiffs,
vs.
BLAKE LIVELY, et al.
Consolidated Defendants.

CONFIDENTIAL
VOLUME II
VIDEO-RECORDED DEPOSITION OF JUSTIN BALDONI
Los Angeles, California
Tuesday, October 7, 2025

Stenographically Reported by: Ashley Soevyn,
CALIFORNIA CSR No. 12019

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
---0O0---

BLAKE LIVELY,
Plaintiff,
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)
25-CV-449 (LJL) (MEMBER CASE)

WAYFARER STUDIOS LLC, ET AL.

Defendants.

JENNIFER ABEL,
Third-party Plaintiff,
vs.
JONESWORKS, LLC,
Third-party Defendant.

WAYFARER STUDIOS LLC, et al.
Consolidated Plaintiffs,
vs.
BLAKE LIVELY, et al.
Consolidated Defendants.

CONFIDENTIAL

Video-recorded Deposition of JUSTIN BALDONI, taken on behalf of the Plaintiff Blake Lively, Pursuant to Notice, at the offices of Willkie Farr & Gallagher, 2029 Century Park East, Los Angeles, California beginning at 9:11 a.m. and ending at 7:29 p.m. on Tuesday, October 7, 2025, before me, ASHLEY SOEVYN, California Certified Shorthand Reporter No. 12019.

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Laura Prather, Esq.

Also Present in the deposition room:
Steve Sarowitz
Jennifer Abel
Jamey Heath
Jonathan Hernandez, Videographer

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JUSTIN BALDONI
BLAKE LIVELY V. WAYFARER STUDIOS LLC, ET AL.
Tuesday, October 7, 2025
Ashley Soevyn, CSR No. 12019

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CONFIDENTIAL DEPOSITION PROCEEDINGS
TUESDAY, OCTOBER 8, 2025
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THE VIDEOGRAPHER: Good morning. We're on the record. The time is 9:11 a.m. Pacific Daylight Time. Today is October 7th, 2025.

My name is Jonathan Hernandez. I'm a video technician with Veritext Legal Solutions located in Los Angeles, California.

We are recording these proceedings at 2029 Century Park East, Los Angeles, California. This is the video deposition of Justin Baldoni in the action entitled Blake Lively v. Wayfarer Studios LLC. This deposition is being taken on behalf of the plaintiff. The Case No. is 24-CV-10049.

Now, would you all please identify yourselves and who you represent, starting with the noticing attorney.

MR. GOTTLIEB: Good morning. Mike Gottlieb from Willkie Farr & Gallagher on behalf of the Plaintiff, Blake Lively.

MS. CONNOLLY: Michaela Connolly from Willkie Farr & Gallagher on behalf of Blake Lively.

MS. HUDSON: Esra Hudson of Manatt, Phelps & Phillips on behalf of Plaintiff, Blake

Lively.

MS. BENDER: Kristin Bender, Willkie Farr & Gallagher on behalf of Blake Lively.

MS. ROESER: Stephanie Roeser, Manatt Phelps & Phillips also on behalf of Plaintiff, Blake Lively.

MS. TAHLER: Kristin Tahler, Quinn Emanuel on behalf of Stephanie Jones and Jonesworks.

MS. BABAYAN: Laurenne Babayan, Quinn Emanuel on behalf of Stephanie Jones and Jonesworks.

MR. GLOVER: Joel Glover of Jackson Walker for Jed Wallace and Street Relations, Inc.

MS. BENSON: Summer Benson of Liner Freedman Taitelman & Cooley on behalf of the Wayfarer parties.

MR. BACH: Jonathan Bach, Shapiro Arato Bach on behalf of the Wayfarer parties and the deponent, Justin Baldoni.

MS. SHAPIRO: Alexandra Shapiro, Shapiro Arato Bach, on behalf of Mr. Baldoni and the Wayfarer parties.

And I just want to note for the record that we are designating this deposition confidential pursuant to the protective order.

MR. FREEDMAN: Bryan Freedman on behalf

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of the Wayfarer and related parties and Mitra Ahouraian is also present representing the Wayfarer parties.

THE VIDEOGRAPHER: Thank you. Now will the court reporter please introduce yourself and administer the oath to the witness, and then counsel may begin.

THE STENOGRAPHIC REPORTER: Good morning, everybody. I'm Ashley Soevyn, California Steno Reporter 12019.

And can I please have you raise your right hand?

Do you solemnly state that the testimony you're about to give in this deposition will be the truth, the whole truth, and nothing but the truth?

THE WITNESS: I do.

THE STENOGRAPHIC REPORTER: Great. Thank you.

EXAMINATION

BY MR. GOTTLIEB:

Q Good morning, Mr. Baldoni.

A Good morning.

Q Have you ever been sexually harassed?

A Yes.

Q When?

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A That I have reported or just in my life?

Q Let's start with when -- ones you've talked about. Times you've talked about.

A Harassed -- I -- I believe I spoke about a time when I was in the Burke Williams spa in West Hollywood. And I was in the hot tub waiting for a massage, and I had my shorts on, my bathing suit shorts on. And there was a gentleman that was in -- that was like multiple hot tubs, and he was in another hot tub, and I saw him look at me. Which I was used to, looks and things.

And then he joined me in my hot tub. And he started to share he was a producer or a manager. And then he tried to get me to take my bathing suit off because he said that all the other actors and celebrities go in the hot tub naked. I said I wasn't comfortable with that. So I jumped in the other hot tub.

And then he followed me into that hot tub, and he was nude. And he walked -- I was sitting in the hot tub, and he walked right up to me fully nude, and then he sat in the hot tub with me and he continued to try to get me to take off my bathing suit, and I left.

Q And I think you told this story in an

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interview with Glamour magazine; is that right?

A I don't know which magazine it was. I remember talking about it only once, and it was right after a speech that I gave.

Q Okay. After that TED talk that you gave?

A Yes, at TEDWomen.

Q Do you recall being asked the question prompting that answer: Did you ever feel like you were harassed or victimized on set?

A I don't remember that.

Q Okay. But as you sit here today, this is the first example that you have brought up in response to my question of whether you've ever been sexually harassed?

A That's the first response that -- I think you asked me if I've talked about it publicly.

Q Okay.

A Yeah.

Q Why did you feel harassed by what this producer did?

A Well, he was asking me to get naked in the hot tub with him and standing very close to me with his naked genitals, like intentionally walking close to my face. It was just him and I in there. And he was using -- like, he was using the idea that

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he's a successful manager to try to get me to do something I didn't want to do. And it was very sexual.

Q It made you uncomfortable?

A You could say that. Yeah.

Q And you told him that you didn't want him to do that?

A Yes.

Q And then he did it again?

A Yes.

Q And then you left?

A Yes.

Q Why did you perceive this person to have power? Or how did he seem powerful to you?

A He said -- he said that he was powerful. I don't think I felt that he was powerful necessarily, but he was claiming he knew all these A-list stars. And he would say things like Clooney is in here all the time without his shorts on. And, you know, referring to, you know -- I don't know. I was -- I was maybe 25 and, yeah. He was older, much older.

Q Did he touch you?

A No.

Q Did he threaten you?

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A No.
Q So he didn't assault you?
A I wouldn't call it assault. I don't believe I characterized it as assault.
Q I didn't say you did, sir.
A Yeah.
Q You were bigger and stronger than this guy, right?
A I would imagine I was.
Q This wasn't someone the size of Dwayne Johnson or The Rock or something like that?
A It was not.
Q So if it had come to it, you probably could have knocked the guy out?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not much of a fighter. I would have left.
BY MR. GOTTLIEB:
Q You didn't work for the guy, right?
A No.
Q So you had no employment relationship with him?
A No, I didn't.
Q Okay. Did you -- do you know who he was?
A I think he told me his name. But...

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Q Did you try and find him after the incident and talk to him about it?
A No.
Q Did you find him before you talked about this event in Glamour magazine?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q You didn't want to give him an opportunity to take accountability for his actions and make it right?
A I didn't name him.
Q But you described him and described who he was friends with and the spa you were in?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know if I described who his friends were.
BY MR. GOTTLIEB:
Q Do you know his name as you sit here today?
A No.
Q I think you've already talked about your experience with your college girlfriend; is that right?
A Yes.

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Q Do you believe that your college girlfriend sexually assaulted you?
A I do.
Q Do you believe she raped you?
A I'm not sure if I believe she raped me. No.
Q If I understand some of the talks you've given about this, this is something that you sort of remembered or confronted during therapy?
MS. SHAPIRO: Objection.
THE WITNESS: Yes. Yes.
BY MR. GOTTLIEB:
Q How many years after this event or events occurred would you say you confronted it through therapy?
A Maybe starting about 10 years after.
Q Okay. And I'm not going to ask you about conversations you've had with your therapist or your lawyers in this deposition. But apart of from those conversations with your therapist, what did you do to try to piece back together what had happened to you that 10 years prior?
A I mean, it was a lot of therapy. A lot of meditation. Thinking about it, going back and forth. It wasn't like just one moment and then

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suddenly, it's like, oh, that's what happened. It was -- it's a journey. And the memories, they shift, and they come and go, and then you justify. But it was just a lot of therapy. Conversations with my wife.
Q How long did the -- I think you've described this as a very bad relationship; is that fair?
A It was not a good relationship.
Q The relationship with the college girlfriend?
A Yeah.
Q How long did it last?
A I believe about a year and a half.
Q Did you all have mutual friends?
A I believe at that point, it was just we all kind of had the same friends.
Q You had a group of friends that in college -- and sorry, what years of college was this for you?
A Freshman year going into sophomore year.
Q Okay. So you had a group of friends that you all hung out with -- and sorry. I need to back up.
Where did you go to college?

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A Cal State Long Beach.
Q Okay. So freshman and sophomore at Cal State Long Beach, that's a big school, right?
A Yes.
Q And you and your girlfriend had a relationship that lasted some amount of time. I imagine there are other people who knew who you were dating?
MS. SHAPIRO: Objection.
THE WITNESS: She didn't attend the school. She didn't go to college.
BY MR. GOTTLIEB:
Q Did your friends at -- your friends at college know who you were dating?
A Yeah, a few of them did.
Q Okay. Before you talked about what happened to you in public, did you go back to talk to your college girlfriend?
A No.
Q Did you try to find her?
A No.
Q Did you ever attempt to communicate to let her know that you were going to be accusing her of sexual abuse in public?
MS. SHAPIRO: Objection.

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THE WITNESS: No.
BY MR. GOTTLIEB:
Q Did you ever go back to talk to any of your college friends or people that you might have hung out with mutually to tell them what you were going to do?
A I don't know anybody from back then.
Q Do you have any idea whether or not your college girlfriend would agree with the way you have remembered the events relating to the losing of your virginity?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know what she would think. I don't know who she is anymore.
BY MR. GOTTLIEB:
Q But you thought it was okay to go on TV and tell the world that your college girlfriend had sexually abused you without ever talking to her about it?
MS. SHAPIRO: Objection.
THE WITNESS: I wasn't aware I needed to ask her permission to share my story.
BY MR. GOTTLIEB:
Q Am I right that one of the things that was most traumatic about this to you is that you

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were saving yourself for marriage?
A That was a part of it. I also just wasn't ready.
Q And so you were -- you were a virgin at age 18 when you met her in college?
A Yes.
Q And I believe your description of what happened is that you woke up in the middle of the night, and she was taking it from you. Is that an accurate description of your words?
A No.
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q Okay. How would you describe it?
A I think you're confusing two different stories. I don't --
Q Okay.
A -- mean to, you know, say you're wrong. But that wasn't the story that I shared in my book.
Q Okay. You've never described the incident when you lost your virginity as waking up and discovering your college girlfriend was taking it from you without your consent?
A No, that wasn't the story of how I lost my virginity.

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Q Okay.
A There was --
Q I'm mistaken then?
A Yeah. There -- there was a moment in the relationship where I was -- I was woken up by her on top of me having sex with me, but that was after I had already lost my virginity.
Q What is her name?
MS. SHAPIRO: Objection. I'm going to instruct you not to answer that.
MR. GOTTLIEB: On what basis?
MS. SHAPIRO: It's irrelevant and not calculated to lead to discoverable evidence.
MR. GOTTLIEB: That is not a proper basis to instruct a witness not to answer a question.
MS. SHAPIRO: I'm instructing him not to answer.
BY MR. GOTTLIEB:
Q Are you going to follow your counsel's instruction?
A I am.
Q Would you be capable of telling me her name but for your counsel's instruction?
A I would.
Q Okay. Are there any other incidents

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relating to sexual harassment or abuse that you have suffered that you have talked about publicly?
A I don't believe so.
Q Did these experiences inform why you wanted to make It Ends with Us into a movie?
A Not -- I don't know if that -- if it was a conscious thing. Once I was -- once I had read it, once I was making it, it informed how I wanted to make the movie. But it wasn't, like, the reason for making the movie.
Q Okay. I think I understand you. It wasn't the originating seed --
A No.
Q -- but it did inform how you approached the making of the movie, your personal experiences?
A It 100 percent informed the narrative arc of the film. And yeah, I would say -- I would say the adaptation from the book to the script. And also how I was able to connect with it.
Q And it, obviously, has informed your podcast, correct? By "it," I mean your experiences we've just discussed.
A My sexual trauma --
Q Yes.
A -- has informed my podcast. It's not the

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reason I did my podcast. But there was absolutely moments where we discussed sexual trauma, and yeah, it's one of the many things we discuss.
Q Okay. And I will stick with your framing, which I like, which is not the thing that caused it originally, but informed in some ways. So it's the same with respect to this question.
Did your experiences inform what you wanted out of Wayfarer Studios?
MS. SHAPIRO: Objection.
THE WITNESS: Did my experiences with sexual trauma --
BY MR. GOTTLIEB:
Q Inform in any way --
A -- inform in any way what I wanted out of Wayfarer Studios? Not consciously.
Q Perhaps subconsciously?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not an expert on the subconscious, but I imagine the subconscious exists in all of us.
BY MR. GOTTLIEB:
Q But you do believe that work is service, right?
MS. SHAPIRO: Objection.

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THE WITNESS: I believe that work should be and can be a form of service, correct.
BY MR. GOTTLIEB:
Q And you believe in the tenets of the Baha'i faith?
A Is that a question?
Q Yeah.
A Do I believe -- yes. Absolutely.
Q And Wayfarer is a Baha'i-inspired organization; is it not? Wayfarer Studios.
A I think we were very mindful, actually, to not make it a Baha'i-inspired organization. But it was inspired by the principles of the Baha'i faith. I don't believe it's officially labeled a Baha'i-inspired organization, and there are reasons behind that.
Q Sure. It's not a Baha'i only studio, right?
A Absolutely not.
Q But it is, nonetheless, inspired by many of the principles or tenets of the Baha'i faith; is that fair?
A By the belief system of the people who started it, inspired by it, yeah.
Q And that would be, at least in its

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current form, you and Mr. Sarowitz?
A Correct.
Q And you both share the Baha'i faith?
A We both --
MS. SHAPIRO: Objection.
THE WITNESS: We both share that we are both Baha'i's, yes.
BY MR. GOTTLIEB:
Q And you both have talked about, publicly many times, some of what you considered to be the important tenets of the Baha'i faith?
MS. SHAPIRO: Objection.
THE WITNESS: I think that's accurate, yeah.
BY MR. GOTTLIEB:
Q Okay. Did you ever tell anyone you ran a Baha'i set?
A A Baha'i set? I have no idea. I don't know what a Baha'i set would be. If I did, you're welcome to show me.
Q Did you ever hear Mr. Sarowitz refer to your sets as a -- any of your sets as a Baha'i set?
A I have not.
Q Would you even know how to describe what a Baha'i set is?

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A A set with all Baha'i's? I don't know.
Q Well, so you're the director, and you're the co-founder of the studio. And I'm here and I'm asking you, okay?
A Yeah. Yeah.
Q Okay. Someone has told me that your set is a Baha'i set. Okay?
A Are you -- sorry. Are you giving me a --
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q Just let me finish my question.
A Okay.
Q So let's establish some principles. You're the cofounder of Wayfarer Studios, correct?
A Correct.
Q You were the director of It Ends with Us, correct?
A Correct.
Q Producer?
A No.
Q Lead actor?
A Second lead actor.
Q Second lead actor. And I come to you now and I say, Mr. Baldoni, you're the director of this film, you're the cofounder of this studio. Someone

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has told me this is -- the set of It Ends with Us is a Baha'i set. What does that mean?
MS. SHAPIRO: Objection.
THE WITNESS: I have no idea.
BY MR. GOTTLIEB:
Q Okay. I want to read you something Mr. Sarowitz says and I -- you watched some of his deposition so you may have been in for talking about some of this. I just want to know if you agree, disagree or --
A Is this from his deposition or something else?
Q It's not. It is something he said elsewhere so I'm going to read it to you, and I'm going to ask you your thoughts on it.
A Okay.
Q This is from a talk that he gave in 2020. He said:
(As read):
"Art reflects society and society reflects art, and we want to make art that raises spirits. That's the number one thing. If you really want to say what Justin and I are doing together, what he does so well and I support him

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in doing, is he makes movies that uplift our spirits and I'm so happy to be his partner in doing that so it is really just -- so it is really another practical application of faith. "
Do you agree with what Mr. Sarowitz said there?
A I agree that those are his feelings and that it's really nice, yeah.
Q Do you share his feelings with respect to what I just read you?
A Can you read it one more time?
Q (As read):
"Art reflects society and society reflects art, and we want to make art that raises spirits. That's the number one thing. If you really want to say what Justin and I are doing together, what he does so well and I support him in doing, is he makes movies that uplift our spirits."
And I will stop right there because the rest of it is surplusage.
MS. SHAPIRO: Are you going to pose a question?

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MR. GOTTLIEB: He asked me to repeat what I read so he can decide if he agrees with it or not, and I have just done that.
THE WITNESS: Yeah. I think that I would agree that that's our intention, 100 percent.
BY MR. GOTTLIEB:
Q Now let me read to you what he said two sentences before. He said:
(As read):
"So I look at Hollywood right now, TV and movies, is a lot of what it is, is gratuitous sex, gratuitous violence. It's things that lower the soul."
Do you agree with Mr. Sarowitz that in Hollywood, gratuitous sex and gratuitous violence lower the soul?
MS. SHAPIRO: Objection.
THE WITNESS: Me and Steve have had many conversations where we tend to disagree on things that lower the soul. So I think that we are in agreement most of the time, and also I think that a blanket statement like that would be hard to agree with.
BY MR. GOTTLIEB:
Q Do you agree with him on the proposition

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that gratuitous sex in Hollywood films is a bad thing?
A I think where Steve and I would have conversations is, what is gratuitous and what is not. As Steve is somebody who wouldn't even want there to be a cigarette or marijuana in a film even if it had to do with the storyline. And any sex at all, at times, Steve has felt was gratuitous. So we've had different conversations about that.
Q Okay.
A So we have to define gratuitous before I can agree with his statement.
Q All right. Let's start from the premise of, do you think gratuitous sex, however you define it, not how Mr. Sarowitz defines it --
A Yeah.
Q -- do you think that is a problem in Hollywood films?
MS. SHAPIRO: Objection.
THE WITNESS: There's a lot of films that are made in Hollywood, and I'm not trying to dodge your question, but I just want to be mindful of generalizing. I think that we have -- I believe we've put so much sex and sexualized so many things that we've become numb to it. And over time, since

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we've become numb to it -- and I'm speaking generally as a "we", collective "we" -- in order to have more of a shock effect than I think that's where Hollywood has gone and made, like -- like sex has just become just something that you expect to see oftentimes, that doesn't actually have to do with the storyline or -- or I don't know if it necessarily moves the plot forward.
So in that sense, I guess I would agree. And I think that in general, Hollywood doesn't make movies for the soul much anymore. It does -- I mean, there are certain people that do. But I'm just saying it's definitely become much more about attention and money and just competing with other places for people's attention in whatever can shock them the most is what wins.
BY MR. GOTTLIEB:
Q And you founded Wayfarer to be different from what you just described; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: I did.
BY MR. GOTTLIEB:
Q You founded Wayfarer to be lights in the darkness; is that correct?
A That was a part of the mission.

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Q You, in founding Wayfarer, said that in Steve Sarowitz you had resources and a partner who shared values and beliefs; is that fair?
A Yeah.
Q Do you recall saying about Wayfarer Studios that you and Mr. Heath "were making a concerted effort to build a spiritual enterprise in every sense of the word, where everybody is free to have their own beliefs and express opinions that may be different from the executives or the shareholders, where there is true unity and equality across the board, and where we're mindful of the positions of power and how those power dynamics work"?
A Was the question do I remember saying that?
Q Do you remember saying that?
A It sounds more like something I've written. I'm not sure if it --
Q Does it sound like something you would write or say?
A I don't know if I'm that eloquent when I speak. But it sounds like it's definitely in line with something that I believe or aspire to.
Q If I told you that that quote appeared

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out of a publication on Baha'iteachings.org entitled "Wayfarer Studios Aims to be a Light in the Darkness," would that refresh your recollection at all?
MS. SHAPIRO: Objection.
THE WITNESS: That would confirm it was probably something that I wrote versus I said.
BY MR. GOTTLIEB:
Q Okay. And do you believe that you have created a spiritual enterprise where everyone is free to have their own beliefs and express their own opinions that may be different from the executives or the shareholders?
MS. SHAPIRO: Objection.
THE WITNESS: Do I believe I've created it?
BY MR. GOTTLIEB:
Q Along with others. Do you believe in Wayfarer Studios, you've achieved that objective?
A To be very frank, I don't know that it's something that could ever be fully 100 percent achieved. I know we strive for it, but I wouldn't be comfortable saying we've achieved it.
Q Okay. You've strived for it?
A Strived, yeah.

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Q And in creating the culture at Wayfarer Studios, do you believe that you have tried to be mindful of the positions of power and how those power dynamics work?
MS. SHAPIRO: Objection.
THE WITNESS: Again, it's something that we strive for. Not perfect at, but strived.
BY MR. GOTTLIEB:
Q As the director of It Ends with Us, do you believe you had more power than members of the cast or crew that were not directors?
MS. SHAPIRO: Objection.
THE WITNESS: In thinking about power dynamics, yes.
BY MR. GOTTLIEB:
Q And you supervised essentially everyone who was on the set, directly or indirectly; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure if I would consider that my role as a director.
BY MR. GOTTLIEB:
Q Were you ultimately responsible for what happened on the set of It Ends with Us?
MS. SHAPIRO: Objection.

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THE WITNESS: I wouldn't put that solely on the director, no. But I was partly --
BY MR. GOTTLIEB:
Q I didn't ask if you --
A -- responsible.
Q I didn't ask if you were the only person.
MS. SHAPIRO: Can you not interrupt his answer?
MR. GOTTLIEB: You're right. You're right. Finish your answer. I apologize.
THE WITNESS: Oh, I just said I wasn't -- I don't think I was the only person responsible. But I was a part of that responsibility, of course.
BY MR. GOTTLIEB:
Q Okay. So I'm not asking if you were the only person who was responsible. But as the director, are you ultimately responsible for what occurs on the set of your movies?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure that I would completely agree with that, the way that question is framed.
BY MR. GOTTLIEB:
Q Okay. What is it about the question that you disagree with, the framing of the question?

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A I just think the premise is off.
Q What piece of the premise is off?
A One of the director's jobs is to bring on a great team and each of those team members have responsibilities. I think it would be impossible for a director to manage everybody. So there are department heads and producers and executive producers and all kinds of various jobs that each have people reporting under them and that each have their own responsibility.
So like if, you know, something happened to an extra, I don't know if that's ultimately the director's responsibility. If the catering was cold that day, I don't know if that's the director's responsibility.
If a stunt person was killed, I don't know if that's the director's responsibility. There is a stunt department. So that's what I mean by the premise. At least my understanding of what you were asking.
Q What about what the director does?
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q Who is responsible for that?
A Could you be more specific?

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Q Well, the director is not responsible for the caterers or the stunt doubles, but what about the director? Is the director responsible for what the director does?
A Yes, of course. I was just answering your question to the best that I could.
Q Okay. So we can at least agree that as the director of It Ends with Us, you were responsible for what you did on the set?
A I was responsible for a lot, yeah.
Q What you did, what some other people did, that we'll have to define as we go through the day, but not everything; is that fair?
MS. SHAPIRO: Objection.
THE WITNESS: Not solely responsible for everything, but responsible, of course. I'm the director.
BY MR. GOTTLIEB:
Q Okay. Did Wayfarer Studios have policies and procedures that were in place during the filming of It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: Policies and procedures?
BY MR. GOTTLIEB:
Q Any policies and procedures that were in

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place?
A I believe so.
Q And were those policies and procedures applicable to you as the director of the film, to the best of your knowledge?
MS. SHAPIRO: Objection.
THE WITNESS: You have to be more specific on what policies and procedures that you mean.
MR. GOTTLIEB: Okay.
THE STENOGRAPHIC REPORTER: Exhibit 20 for the record.
(Exhibit 20 marked for identification.)
BY MR. GOTTLIEB:
Q Mr. Baldoni, you've been handed a document marked as Exhibit 20. It's a document bearing the Bates Nos. WAYFARER_139046 through 139076.
And you can take a look. It's a lengthy document.
A Am I on this document?
Q Take a look through the first few pages, and the first thing I'm going to ask you is if you recognize it, and then I will ask you some more questions.

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Mr. Baldoni, I think you've now had a chance to look at the cover letter --
A Yes.
Q -- and the Table of Contents.
A I haven't looked at all the Table of Contents of it.
Q You flipped through it?
A Would you like me to look at them?
Q There is not going to be a quiz on it, I promise.
A Sure.
Q The main thing -- the first thing I want -- the first thing I want to ask you is: Have you ever seen this? Not the text chain that's on the front, but the employee handbook that begins on the page with the Bates No. 139049 on it?
A I believe years ago, yes.
Q Okay. And you and Mr. Sarowitz sign off on the introductory letter to this handbook; is that correct?
A Our names are on there. So yes, we do.
Q You are the co-chairman of the studio; is that correct?
A That is correct.
Q There is no other chairman of the studio

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you're aware of?
MS. SHAPIRO: Objection.
THE WITNESS: Just Steve Sarowitz and myself.
BY MR. GOTTLIEB:
Q What are the responsibilities that go along with being, to the best of your understanding, the co-chairman of Wayfarer Studios?
A My responsibilities?
Q Any responsibilities that you believe apply to you?
A My responsibilities are to -- to help select and pick who I believe, along with my co-chairman, to be the best managers for the company. To help the company in its creative direction. More bird's-eye view of ideally hopefully where we're going. And then to consult with -- with the CEO, and president, and upper management. And my specific responsibilities are also to help with creative for the various projects that we have.
Q Okay.
A Based on my time.
Q You see in the cover letter that you and Mr. Sarowitz have written for this handbook, a

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reference to Wayfarer Studios being a Baha'i-inspired organization?
A I see that. Yes.
Q We were talking a little bit about that before. It's not a --
A Yes.
Q This is consistent with what you previously testified to?
MS. SHAPIRO: Objection.
THE WITNESS: Yeah, I -- I did not remember -- we had many conversations about actually not calling it a Baha'i-inspired organization. So I think legally we did not. And that was mostly because we didn't ever want to make anybody feel like they were working at a religious company. So I believe an early version of this did not have it on there, which is where my memory was coming from. But I do see it here, and I don't deny that.
BY MR. GOTTLIEB:
Q Okay. Are you aware of a later version of this handbook in which that was removed?
A I'm not aware of a later version. I imagine this is the most recent version. I believe there have been different versions of this various letter over the years.

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Q And when you say legally you were not a Baha'i-inspired organization, I'm not going to be asking you for your legal opinions during this deposition.
A No, no, no.
Q What are you saying?
A It was just in the starting of an organization as it relates to the Baha'i faith, we did not want our company to, in any way, be a part of the Baha'i faith as an organization.
Q I see.
A So that's essentially what I mean, is that because the Baha'i faith's internal government, if you will, is different than maybe like the Catholic church or other Christian organizations, there is a Baha'i organization that actually is a government in the Baha'i faith. And we did not want a company to legally be tied or associated with an official Baha'i organization.
Q I understand.
A So that was the debate and the conversation around like a Baha'i-inspired organization and what that actually means.
Q Okay. Do you see where you've written, with Mr. Sarowitz, "This handbook has been written

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to serve as the guide for our relationship and the various work rules"?
A Yes.
Q And then do you see, if you flip a page over, in the Table of Contents, there is a series of categories. I'm looking, sir, at page 139050, there is a list of categories of different types of -- of rules that apply to employees of the company?
A Are you looking at employment -- underneath "Employment"?
Q I'm just seeing -- asking you if you see in the Table of Contents a bunch of different categories of policies, procedures and rules --
A Yes, I do --
Q -- that apply to the company?
A -- I do see that.
Q Okay. If you flip ahead to page 5 of this document, which is WAYFARER_139053. Do you see at the top of that page, "Equal Employment Opportunities, Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy" at the top?
A Yes, I do.
Q And have you ever read this, this policy?
A I don't know if I've read this one, no.
Q You don't know or you think you haven't?

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A The policy that is directly in front of me, I don't know if I have read this policy.
Q Okay. So do you know if you've ever had any kind of training on this policy, this anti-discrimination, anti-harassment, and anti-retaliation policy?
A Yes, I believe I have.
Q When was that?
A I think every couple years.
Q When was the last time you attended one?
A In person?
Q At all. Virtually or in person?
A Virtually -- virtually, I completed mine last week --
Q Okay.
A -- for this year.
Q For the year 2025?
A Yes.
Q Prior to that, do you recall the last time you had training on this policy?
A I imagine it was two years before that.
Q Do you recall there ever being a training on anti-discrimination, anti-harassment and anti-retaliation during the production of It Ends with Us?

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A Yes.
Q Did you attend that training?
A I did.
Q Did you attend that training in person?
A Yes.
Q Where was it?
A In our production offices.
Q On the set in New Jersey?
A Not a set, but the production offices in New Jersey.
Q Okay. The production offices in New Jersey near where the -- strike that.
A Yeah --
Q Strike that.
A All right.
Q It's a bad question.
Okay. We'll come back to that.
During that training, do you remember going through examples or scenarios of types of conduct that would be a violation or a potential violation of this anti-discrimination, anti-harassment, and anti-retaliation policy?
A I can't remember specifics, but I do -- that was the -- the bulk of the harassment training.
Q Was there a presentation?

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A It was a man -- yeah. We were in person but the man was over Zoom --
Q Okay.
A -- from my memory.
Q Were there slides?
A I'm assuming there were, yes.
Q Okay. So if I showed you some slides, you might be able to tell me if they were the ones you saw?
A To be very honest, if you showed me slides, I would not know if they were the exact ones I saw. It was years ago.
Q I think I said might be able to tell me, but okay. Fair enough.
Do you see at the top of page 5, in the second paragraph, second sentence, the sentence:
(As read):
"Wayfarer Studios strictly prohibits discrimination, harassment or retaliation against employees, applicants or any other covered person"?
A I see that.
Q And that's the Wayfarer Studios policy, right?

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A Yes.
Q Do you agree with it?
A Yes.
Q You've done your best to follow it?
A I have done my best to follow it, yes.
Q Do you see a long list of characteristics that under the Wayfarer Studios policy are protected?
MS. SHAPIRO: Objection.
THE WITNESS: May I read it?
BY MR. GOTTLIEB:
Q Sure thing.
A I've read this paragraph.
Q Okay. You've read the paragraph that lists out the protected characteristics, correct?
A Yes.
Q So you see that gender is protected?
A I do.
Q You see that sex is protected?
A Yes.
Q And you see that further includes pregnancy, breastfeeding, childbirth?
A I do.
Q Do you see that height and weight are also protected characteristics?

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A Height, weight and -- yes.
Q And do you see in the next line down after that paragraph, the sentence that says:
(As read):
"All Wayfarer Studios employees, officers, principals, agents, workers and representatives are prohibited from engaging in unlawful discrimination, harassment and/or retaliation"?
A Yes.
Q And you were an officer of Wayfarer Studios; is that correct?
A As co-chairman, I believe I am.
Q And you were also an agent or an employee because you were hired to be the director of It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And you certainly represented Wayfarer Studios in your role as co-chairman, right?
A I believe I am.
Q And, in fact, you and Mr. Sarowitz are the highest people in the hierarchy of Wayfarer; is that right?

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MS. SHAPIRO: Objection.
THE WITNESS: Yeah.
BY MR. GOTTLIEB:
Q Ultimately, the CEO and upper management answer to you and Mr. Sarowitz; is that right?
A Ultimately, yes.
Q In other words, if you and Mr. Sarowitz decide that, you know, you had it with Mr. Heath, it's your decision whether to get rid of him, right?
A Yes. Do you want to tell him or should I?
Q I think you should. It would go over smoother.
So do you see that one paragraph down from the sentence I just read, the anti-harassment policy?
A I see that.
Q And do you see where it says --
A I have not read this, so...
Q Okay.
A Can I read it?
Q Why don't you read that -- I'm going to ask you questions about the next three paragraphs, so if you want to read the next three paragraphs, then I will ask you questions about them.

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A I think I've gotten through them now.
Q Okay. So back on the previous page, page 5 of this document, in the start of the anti-harassment policy, do you see the sentence that reads:
(As read):
"Wayfarer Studios prohibits harassment, disrespectful or unprofessional conduct by any employee of the company, including supervisors, managers and co-workers."
Do you see that?
A I do.
Q Do you understand what that means?
A That we prohibit harassment by anybody at the company.
Q Okay. Do you see then the sentence that starts with "Harassment may be verbal, written, or physical conduct"?
A I do.
Q Okay. So if you carry that sentence over to the next page:
(As read):
"Harassment may be verbal, written, or physical conduct."

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Go to the -- in front of the A, B and C:
(As read):
"That, A, has the purpose or effect of creating an intimidating, hostile or offensive work environment; or, B, has the purpose or effect of unreasonably interfering with an individual's work performance; or, C, otherwise adversely affects an individual's employment opportunities."
Do you see that sentence?
A I do.
Q Do you recall ever receiving training with respect to any of those concepts in the sentence I just read to you?
A I believe I do.
Q Do you recall receiving training that discussed that harassment can be conduct that has either the purpose or the effect of creating a hostile or offensive work environment?
A I do.
Q Okay. And do you see the -- in the next paragraph, the sentence that reads:
(As read):
"Sexual harassment includes harassment

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that is not necessarily sexual in nature."
Do you see that?
A Yes.
Q You've been trained on that concept?
A I believe I have.
Q And you see further down there is another A, B, and C here because, of course, we lawyers love to put A, Bs and Cs into our -- into our documents. Do you see subsection C says:
(As read):
"Such conduct has the purpose or effect of substantially and unreasonably interfering with an individual's work performance by creating an intimidating, hostile, or offensive working environment."
Do you see that?
A I do.
Q Do you understand what that means?
A I believe I do.
Q And you've been trained on that as well?
A I believe I have.
Q Okay. Do you see where it says:
(As read):

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"Sexual harassment may include a range of subtle and not so subtle behaviors"?
A Yes.
Q And it can include:
(As read):
"Sexual jokes or innuendo, commentary about an individual's body, sexual prowess or sexual deficiencies or touching"?
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q I know I left some words out.
A Yeah, yeah, yeah.
Q But do you see the words that I read there --
A Yes.
Q -- in this policy?
A Yes.
Q And you've been trained on this as well?
A I believe I have.
Q And because of that training, you understand that the policy prohibits behavior that has these effects on employees regardless of whether those effects were intended; is that right?
MS. SHAPIRO: Objection.

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THE WITNESS: I believe so, yes.
BY MR. GOTTLIEB:
Q Okay. If you turn -- sorry. If you look then at "Supervisor and Manager Responsibilities." Do you see where it reads:
(As read):
"If any supervisor or manager becomes aware of a violation of this policy, they are obligated to report the violation to human resource management so Wayfarer Studios can investigate and, if appropriate, take corrective action"?
A Yes.
Q You understood that was your responsibility as a supervisor or manager?
MS. SHAPIRO: Objection.
THE WITNESS: Yeah.
BY MR. GOTTLIEB:
Q And that was Mr. Heath's responsibility as a supervisor or manager?
A Yes.
Q On the next page, do you see the section entitled "Investigation"?
A Yes.

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Q Do you see where it reads:
(As read):
"Any reported allegations of harassment, discrimination, or retaliation will be promptly and thoroughly investigated by qualified personnel in an impartial manner."
Do you see that?
A I do.
Q Do you see it says:
(As read):
"Wayfarer Studios will ensure that these personnel will use the evidence to reach reasonable conclusions"?
A Yes.
Q And then one more sentence down after that.
(As read):
"Wayfarer Studios will maintain appropriate documentation and tracking to ensure reasonable progress is made."
Do you see all that?
A Uh-huh.
Q And then there is a discussion of what happens at the close of investigation.

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Do you see that?
A Yes.
Q And you see that depending on what's found in an investigation, "Wayfarer Studios will consider appropriate options for remedial actions and resolution and if misconduct is found, Wayfarer Studios shall take prompt, corrective action as appropriate."
Do you see that?
A Yes.
Q Was any investigation of the type described here in this paragraph conducted for the conduct that is at issue in this litigation?
MS. SHAPIRO: Objection.
THE WITNESS: Not until this lawsuit was filed and we were made aware of the conduct.
BY MR. GOTTLIEB:
Q So I think your testimony is, this lawsuit was filed --
A Uh-huh.
Q -- you were made aware of conduct?
A We were made aware of allegations of misconduct.
Q Okay. And then you launched an investigation?

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MS. SHAPIRO: Objection.
THE WITNESS: Correct.
BY MR. GOTTLIEB:
Q And is that because -- am I understanding you correctly to say you were made aware of allegations in the filing of this lawsuit that you were unaware of previously?
A Correct.
Q What are the allegations as you sit here today that you understand were made in the lawsuit that you were not aware of previously?
MS. SHAPIRO: Objection.
THE WITNESS: Sexual harassment, retaliation. I mean, there is a very long list that I'm sure you have that you can present me and I can tell you what I was aware of or what I wasn't.
BY MR. GOTTLIEB:
Q So I will do this to try to be clear and that we understand each other.
I understand sexual harassment and retaliation to be legal labels that can include different incidents that might occur that inform those legal labels. Is that how you understand them?
MS. SHAPIRO: Objection.

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THE WITNESS: Can you say that one more time?
BY MR. GOTTLIEB:
Q Let me try it a different way because that's going to take us down a lengthy rabbit hole that you won't like and your lawyers won't like and I will regret.
You said that you had not been aware of allegations of sexual harassment and retaliation until the filing of the lawsuit?
A Yes.
Q Okay. Do you understand that there were factual allegations that informed Ms. Lively's complaint asserting sexual harassment and retaliation?
A Can you break down what you mean by that?
Q Do you understand that Ms. Lively's complaint or this lawsuit that you have said led to the launching of an investigation, that lawsuit included allegations of events that took place on specific dates and times that Ms. Lively asserted constituted sexual harassment and retaliation?
Do you understand that?
A Yes, I understand that.
Q Okay. Is it your testimony that you were

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unaware of the incidents that were described in the complaint? Or is it your testimony that you were unaware that Ms. Lively thought that those incidents constituted sexual harassment and retaliation?
MS. SHAPIRO: Objection.
THE WITNESS: My testimony is that this lawsuit and The New York Times article and the CRD complaint was the first that I had heard of many of these allegations that evidently I was at or a part of, which I completely disagree with whether or not they happened.
That said, the reason we launched an investigation was because this was the first official complaint, lawsuit against us. So that investigation happened because it was past the HR complaint situation. It was now an official, very public situation.
BY MR. GOTTLIEB:
Q Is it your understanding of the Wayfarer policy that in order to investigate allegations of sexual harassment and retaliation, that an official HR complaint needs to be filed by the complainant?
A I'm not sure.
Q In fact, didn't we just look at on page 6 of the policy in the section entitled "Supervisor

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and Manager Responsibilities," there's a line that says:
(As read):
"If any supervisor or manager becomes aware of a violation of this policy, they are obligated to report the violation to human resources/management so Wayfarer Studios can investigate and, if appropriate, take corrective action"?
MS. SHAPIRO: Objection.
THE WITNESS: I see that, yes.
BY MR. GOTTLIEB:
Q So it is actually under your -- Wayfarer Studios' policy, it's not incumbent upon the person who feels that they have been harassed to come forward with a formal HR complaint; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know if there is another part of this that says there needs to be a formal HR complaint or not, so I don't know.
BY MR. GOTTLIEB:
Q Okay. You don't see one as you're sitting here looking at this page, do you? Under the box that says "Supervisor and Manager

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Responsibilities"?
MS. SHAPIRO: Objection.
THE WITNESS: No, I don't see one.
BY MR. GOTTLIEB:
Q Okay. You testified yesterday, I believe, that you've never read The New York Times article; is that correct?
A Never personally read it, no.
Q You've never sat down to read the article published by The New York Times written by Megan Twohey about the incidents in this case?
A I did not personally sit down to read it.
Q So as you sit here today, you do not know personally anything that that article says?
MS. SHAPIRO: Objection.
THE WITNESS: No, I would not say that that's true.
BY MR. GOTTLIEB:
Q You have no personal knowledge from your own experience of what that article says; is that right?
A I have personal firsthand knowledge from my attorneys giving me point by point all that was in the article.
Q Okay. So let me try it this way because

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I don't want to ask you questions about your conversations with your lawyers.
Other than what other people have told you, whether attorneys or anybody else, other than what other people have told you about what is in the Megan Twohey article, do you have any knowledge of what is in it?
A I do.
Q And what is that based on?
A It's based on reading parts of it.
Q What parts of it do you recall reading?
A I remember reading the beginning and then feeling sick. I remember reading some of the details around what I was being accused of. I remember just seeing my private text messages on there and being very confused. I remember reading that they had launched an investigation or that they had done a -- like it was an investigative -- she had done this investigation and gone through thousands of documents but never spoken to me or anyone from our company.
Q Was that troubling to you?
A That a investigative journalist did a New York Times article on -- put my picture and my face on the cover and didn't ask me any questions about

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it? I found that troubling.
Q It's important in understanding an event that has happened in talking to the eyewitnesses, right?
MS. SHAPIRO: Objection.
THE WITNESS: Are you meaning when you're an investigative journalist and you're writing for The New York Times?
BY MR. GOTTLIEB:
Q As a human being searching for truth?
MS. SHAPIRO: Objection.
THE WITNESS: If the writer wasn't there, I would assume so.
BY MR. GOTTLIEB:
Q One of the reasons you were upset is that you felt like there were incidents that were described that left out your perspective; is that right?
A There were many reasons that I was upset.
Q My question was, one of the reasons you were upset is because there are incidents that were described that left out your perspective on what happened; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.

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BY MR. GOTTLIEB:
Q Okay. When -- relatedly when Ms. Lively sent her California Civil Rights Department complaint to you through attorneys --
A Via you.
Q -- did you read it?
A No, not that version of it, no.
Q Did you ever read it?
A Not the initial one that was sent.
Q I think you said yesterday you didn't read Stephanie Jones' lawsuit; is that correct?
A No.
Q Did you read Ms. Lively's amended complaint in this case?
A I did.
Q When did you read that?
A I think shortly after it was filed. I don't know the month.
Q Okay. Back on the policy.
A And I read the previous version, not that you asked me.
Q The original complaint?
A I think there was a complaint.
Q And an amended complaint?
A Pre -- (Cross talk.)

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Q Okay. Did you read the complaint that you filed in Federal Court before it was filed?
A I did.
Q Did you read the complaint that you filed against The New York Times before it was filed?
A I did.
Q Everything all the way through?
A To the best of my reading ability.
Q Did you believe that everything in The New York Times complaint was truthful and accurate?
A I believed it to be.
Q Did you believe that everything in the complaint and amended complaint that you filed in Federal Court in the Southern District of New York, everything in it and the attachment to be truthful and accurate?
MS. SHAPIRO: Objection to form.
THE WITNESS: I believed it to be.
BY MR. GOTTLIEB:
Q Okay. Back on the document, page 7. Do you see the section on "Anti-Retaliation"?
A Yes.
Q Do you see the policy states:
(As read):
"Retaliation against an individual

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reporting harassment in good faith" -- sorry -- "for reporting harassment or discrimination in good faith or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and like harassment or discrimination itself will be subject to disciplinary action, which might include termination of employment. Acts of retaliation should be reported immediately and will be promptly investigated and addressed."

Do you see that?

A I do.

Q Do you understand that policy?

A I think I do.

Q Were you trained on it?

A I believe I was.

Q Do you see in the next section, what an employee is supposed to do if they believe they have been subject to misconduct under the policy?

I can be a little more specific with my question --

A Yes.

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Q The answer is yes?

A I was just reading it. Yes.

Q Okay. Do you see the sentence says:

(As read):

"If an employee believes they've been subject to misconduct under this policy, they may file a complaint with the appropriate agency."

Do you see that?

A Yes.

Q And you see that the agencies that Wayfarer Studios is directing its employees to file a complaint, if they believe they have been subject to misconduct under the policy, are the California Department of Fair Employment and Housing and the Federal Equal Employment Opportunity Commission?

Do you see that?

A Yes.

Q Do you know whether Ms. Lively filed complaints with these agencies?

A I imagine -- is the CRD complaint this?

Q My question is what you know.

A I don't technically know.

MR. GOTTLIEB: Okay. I think now is a good time for a break.

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THE VIDEOGRAPHER: We are going off the record. The time is 10:21 a.m.

(Recess.)

THE VIDEOGRAPHER: We're back on the record. The time is 10:39 a.m.

BY MR. GOTTLIEB:

Q Mr. Baldoni, you spoke in publicly about a pornography addiction; is that right?

A I have.

Q You were exposed to pornography for the first time at age 10; is that right?

A You must have read my book.

Q I have read some things. You've talked about how that addition affected your relationship with women?

A I believe I have.

Q And how in some ways, and you'll use your words and not mine, it infected or polluted your relationship to women; is that right?

MS. SHAPIRO: Objection.

THE WITNESS: I think I've written when I have spoken about it publicly, it's been in relation to the part of the brain that's fired when one views pornographic images or graphic images in general.

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BY MR. GOTTLIEB:

Q Okay. I'm most interested in what you said publicly about how in your view being exposed to pornography repetitively affects one's view of consent. Do you recall giving a talk called "Boys Will Be Human: A Talk on Healthy Masculinity with Justin Baldoni"?

A I wrote a book called Boys Will Be Human, and I imagine I've done a talk or two, yeah.

Q Some interviews about the subject of the book?

A Is this a speech that I gave or is this an interview that I gave?

Q This is during an interview, and I want to read you what you said. You said:

(As read):

"When you hit 11 or 12-years-old and your friends have a phone and maybe you don't and you're being shown things for the first time and then you start to think, that is what women want, and in porn, as we know, no means yes or try harder. It starts to become very confusing, which is definitely something that happened to me."

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Do you recall ever saying anything like that?
A I'm sure I did, yes.
Q Is that what happened to you?
MS. SHAPIRO: Objection.
THE WITNESS: When I was -- when I was sexually assaulted, yes.
BY MR. GOTTLIEB:
Q Okay. You said after that:
(As read):
"I'm sure I have crossed boundaries and lines in my teens and 20s not even thinking about it, simply because of the porn I was consuming."
Do you recall saying that?
A I'm sure I did say it, yes.
Q Was that true?
A Again, I don't know. I said I'm sure I had. But I have never crossed a -- never not had consent with a woman. It was -- it was said in most of my book and most of my speaking is speaking to men so that men don't have to feel ashamed of whatever it is they're experiencing.
So in that certain situation, I'm not saying that I have crossed boundaries or not gotten

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consent. But what I'm essentially saying is, there's even a possibility that in my teens and 20s, I wasn't aware.
Q Well, literally what you said is:
(As read):
"I'm sure I have crossed boundaries and lines in my teens and 20s not even thinking about it simply because of the porn I was consuming."
So that's what you said. And my question to you is: Do I understand your testimony to be that you were essentially making that up in order to make other men feel that you were relatable to them?
MS. SHAPIRO: Objection.
THE WITNESS: No. I'm sure I had crossed boundaries in my teens and 20s. I'm sure I have.
BY MR. GOTTLIEB:
Q And do you think that was because of the exposure that you had to this kind of toxic pornography?
A I'm sure that that was a part of it. It was also a different time and part of why I wrote the book, was that consent wasn't taught to boys. And I wanted to make sure that we taught consent to boys and men.

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Q If I told you, Mr. Baldoni, that quote I just read to you was from a discussion that you had with "No More," does that refresh your recollection at all in 2023?
A I'm sure it -- I'm sure it was.
Q Okay. Would it surprise you to learn that in a discussion with No More --
A No.
Q -- you said that you were sure that you had crossed boundaries and lines in your teens and 20s, "not even thinking about it simply because of the porn I was consuming"?
A No, it doesn't surprise me.
Q Did you ever consider whether people listening to that conversation with you and No More might be upset or triggered by that statement you made?
MS. SHAPIRO: Objection.
THE WITNESS: No. As this is a conversation that is about healing. And these are conversations that I've had with the women at No More. And I think anybody that works in this space can agree that pornography, when given to young people, messes with their brains. And we need all hands on deck. So I have no problem being open

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about what was a pornography addiction in my, you know, early teens and 20s.
BY MR. GOTTLIEB:
Q When did you free yourself of the addiction to pornography?
MS. SHAPIRO: Objection.
THE WITNESS: So I don't have a clinical addiction to pornography. I will start there. So clinically speaking, I technically have always been free of addiction --
BY MR. GOTTLIEB:
Q You're not a doctor?
A - to pornography.
MS. SHAPIRO: Objection to --
THE WITNESS: I am not a doctor. But what I'm saying is, I have never been diagnosed with a pornography addiction. It was something that I talked about because I felt I was consuming porn when I was emotional or in my teens when I felt lonely. Mixed with, like, hormones changing and, you know, all of the various things. And I also wasn't exposed, like a lot of boys and men are today, because I was born with dial-up modems.
BY MR. GOTTLIEB:
Q Same.

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A So, I imagine. We were timing our bathroom visits at the same time so I'm assuming we're similar in age. So I've probably been free of it since I felt like I had one. I'd say early 30s.
Q Okay. But it's fair to say that you have spoken openly and publicly --
A Very openly.
Q -- about having an addiction to pornography for some period of time earlier in your life, correct?
A Yes, I was just clarifying because addiction is --
Q Sure. You're not a doctor?
MS. SHAPIRO: Can you -- I'm sorry. I just want to ask both of you to wait until the other one finishes.
MR. GOTTLIEB: My apologies. I will try harder.
THE WITNESS: Likewise.
BY MR. GOTTLIEB:
Q You attended Ms. Lively's deposition, correct?
A I did.
Q Do you remember at her deposition when your counsel, Mr. Freedman, asked my client,

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Ms. Lively, would it surprise you that Justin never had an addiction to pornography?
A I don't remember that.
Q Do you have any idea why?
MS. SHAPIRO: Objection.
THE WITNESS: Why what?
BY MR. GOTTLIEB:
Q Why would somebody who knows anything about you say that?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not a lawyer. I don't know.
BY MR. GOTTLIEB:
Q Do you believe that -- you don't believe that having an addiction to pornography absolves men of whatever they do as a result of that addiction, do you?
MS. SHAPIRO: Objection.
THE WITNESS: Far from it.
BY MR. GOTTLIEB:
Q And you believe men who cross boundaries with women should be held accountable for that, right?
A I think crossing boundaries is a very general, broad statement. But if based on whatever

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the boundary that was crossed, I think there should be an appropriate reconciliation, conversation, atonement.
Q If one partner, regardless of gender, to a relationship, romantic, sexual or otherwise, sets a boundary --
A Yes.
Q -- do you believe that boundary is negotiable?
A No.
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q Okay. So once the boundary is set, somebody crosses it, you believe that the person who crosses the boundary ought to be accountable?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q Okay. Do you recall ever talking about a meeting or a moment that you had with Britney Spears?
MS. SHAPIRO: Objection.
THE WITNESS: I think I do.
BY MR. GOTTLIEB:
Q Do you recall meeting Britney Spears on

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the scene of Jane the Virgin?
A I do.
Q Do you recall talking about that and telling a story about how "I went up and gave her a hug" -- or I gave her a 'hey.' I was like, 'hey.' I gave her a big hug, and I think I scared her because she was like, 'hi' and then I just kind of had this awkward moment of, like, did I just harass Britney Spears."
Do you recall saying that?
A I don't recall saying that, but I believe I'm sure that I said it.
Q Is that consistent with your recollection of how you remember that occurring, what I just said?
A I don't remember giving her a hug. But I remember it -- I was way -- I think I was way too excited to meet her, yes. But I don't remember the details of it. But I can't imagine that I was telling a -- not telling the truth and sharing a story about it.
Q Okay. Have you ever been --
A She was very nice.
Q Sorry?
A She was very nice.

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Q Okay. I'm pleased to hear that. Have you ever been the subject of a workplace investigation?
A Like they were investigating me?
Q Investigating any aspect of your conduct at work?
A Not that I can think of.
Q Prior to the events of this case, are you aware of whether anyone has ever accused you of harassment?
A To my knowledge, I have never been accused of harassment.
Q Prior to the events of this case, are you aware of any time where you were accused of inappropriate behavior at work?
A No.
Q Have you ever been disciplined at -- in your time at Wayfarer Studios for any conduct, your conduct, at work?
A No.
Q Other than what has occurred in this case, has anyone to your knowledge ever refused to work with you on account of your behavior?
A Not to my knowledge.
Q Wayfarer produced the film, Empire Waist;

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is that correct?
A Yes.
Q And who was the writer and director of Empire Waist?
A Claire Ayoub.
Q Were you involved in the production of Empire Waist?
A In a similar way that I'm involved in other productions, yes.
Q Sorry.
A Yes.
Q What is that way?
A I helped with the creative. I helped cast it. I helped Claire get the main song for the film. And the editing process. Introducing her to a friend of mine. I gave notes on the edit. I approved casting. I helped her find the lead actress by having the idea to make a TikTok video looking for a very specific person. And we -- because of that work, we discovered somebody that was phenomenal. And I just tried to support. I visited set and gave notes when I was there that she found very helpful, I think.
Q It sounds like you did a lot?
A Not in comparison to what a, like,

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on-the-ground producer does, but it's just part of what I do.
Q But you do recall visiting the set?
A Yes.
Q Okay. Did Ms. Ayoub accuse you of misconduct?
A No.
Q Ever?
A No.
Q You never heard from anyone that Ms. Ayoub had problems with your behavior on the set or during the production of Empire Waist?
A I never heard from anyone that Ms. Ayoub had problems with my behavior.
Q Even as you sit here today, have you still not heard anything -- and, again, I don't want to -- nothing that you might have learned from your lawyers. So other than conversations you may have had with your lawyers, have you ever heard from Mr. Heath or anyone else at Wayfarer Studios that Ms. Ayoub had problems with your behavior during the production of Empire Waist?
A Again, I'm just trying to be specific to your question. I have never heard that Ms. Ayoub had problems with my behavior. However, I am aware

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that Ms. Ayoub has signed a declaration that evidently said that I was abusive to her or something like that.
Q Have you read that declaration?
A I have.
Q And that's a declaration that Ms. Ayoub filed in this case, right?
A Surprisingly, yes.
Q In the second paragraph of that declaration, Ms. Ayoub writes:
(As read):
"I wrote and directed a film called Empire Waist which was produced by Wayfarer Studios LLC. Justin Baldoni, a founder of Wayfarer, was producer. As part of my work on Empire Waist, I had repeated negative interactions with Mr. Baldoni and his associates, including verbal abuse by Mr. Baldoni. I asked Wayfarer that Mr. Baldoni not be permitted on set during the majority of production as a result of those experiences."
Do you recall reading that?
A I recall reading that.

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Q Did you verbally abuse Ms. Ayoub at any time?
A God, no.
Q So is it your testimony that Ms. Ayoub is lying in what she's written here?
A It's my testimony that I did not verbally abuse her. I don't want to call her a liar.
Q Have you ever talked to her about whether she feels that you verbally abused her?
A I spoke to her many times, especially after what could be considered an incident. And we had a lovely relationship. Which is why I was invited to set and I was very surprised.
Q Did anyone ever tell you that Ms. Ayoub had asked to have you removed from her set?
A No.
Q Even as you sit here today, no one's ever told you that?
A No. I was never asked to be removed from her set. On the contrary, I was invited.
Q Did you also read in Ms. Ayoub's declaration that:
(As read):
"Empire Waist was set to be released in the fall of 2024 in August of that

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year. As a result of my experiences with Mr. Baldoni and ongoing press coverage relating to Mr. Baldoni and It Ends with Us, I requested that he not be involved in Empire Waist marketing or public relations effort. Wayfarer agreed to my request."
Do you remember reading that?
A I did.
Q Do you believe that statement is truthful or false?
A I was not made aware that she did not want me to help promote the movie.
Q Okay.
MR. GOTTLIEB: This is Exhibit 21.
THE STENOGRAPHIC REPORTER: Exhibit 21 for the record.
(Exhibit 21 marked for identification.)
MR. GOTTLIEB: Mr. Baldoni, you've been handed a document marked as Exhibit 21, which is a document bearing the Bates No. HEATH 31887 through 31889.
THE WITNESS: Uh-huh.
BY MR. GOTTLIEB:
Q Who is Ashmi Dang, by the way?

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A Ashmi is the head of marketing for Wayfarer Studios.
Q Okay. And who is Andrew Calof?
A Calof is our head of production and development.
Q Okay. And this is a text message involving Ms. Dang, Mr. Calof, Mr. Heath, Ms. Angela Cardon. Who is Angela Cardon?
A Angela is the executive under Andrew Calof.
Q Okay. And Tera Hanks, who is that?
A Tera Hanks is the president of Wayfarer Studios.
Q Okay. So this is a text exchange involving those people on September 27, 2024. And do you see at the top of this, at page 3187, the first page of the exhibit, do you see there's a screenshot of a text there?
A I do.
Q Do you see Ms. Dang shares a screenshot of what she says is Claire's message with the group?
A Do you mind if I read the whole document?
Q I don't.
A Okay.
Q Do you see how Ms. Dang has screenshot

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Claire's message at the top of this text exchange?
A Yes.
Q And do you see how Claire's message says:
(As read):
"Genuinely feeling f'ing sick. That man was banned from my set"?
A I see that.
Q And do you see how everyone in this text chain understands that "that man" is referring to you?
A Yes.
Q Did any of the individuals on this text thread ever inform you that Ms. Ayoub believed she had had you banned from her set?
A I'm not sure how she could have believed that. So to answer your question, no.
Q Okay. On the next page at the top, do you see Ms. Dang writes at 1:46 p.m.:
(As read):
"I'll add during the early days of working with her on the marketing, she called to express how upsetting the experience was for her, and she had language added to her agreement as a result."

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Do you see that?
A I do.
Q Do you know what Ms. Dang is referring to with the language added to her agreement?
A This is the first I'm seeing of it.
Q Did anyone ever talk to you about changes that were made to Claire Ayoub's agreement based upon how upsetting the experience had been for her?
A No.
Q Do you see a bit lower down in the text, at 5:23 p.m., Ms. Dang says:
(As read):
"To close the loop, JB took down and reposted the trailer with updated copy"?
A Yes.
Q JB is you?
A Yes.
Q Do you --
A I presume.
Q Do you recall reposting or posting at any time the trailer for Empire Waist?
A Yes.
Q Do you recall doing that around this time, at the end of September 2024?

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A I would imagine that was the time, yes.
Q You earlier said something about what could be considered an incident that had occurred that you discussed with Ms. Ayoub?
A Yes.
Q What was the incident?
A Claire and I had a -- a lovely relationship. It was -- she was a first-time filmmaker, and I very much believed in the film that she was trying to make. Also, I was made aware that she was very inexperienced. So I had offered to mentor her and help her any way that I could. So we went back and forth. We had a few calls, I believe. And I was building a relationship with her from that point.
And at the same time, Claire was working with her producing partner to get the budget in line for the movie. We had greenlit her movie at $2 million. It was a movie that nobody else wanted. It was a movie that I believed in the message of very strongly, and I wanted to support her.
And we had a partner at the time, which was Procter & Gamble. And it was my understanding that the budget had inflated from 2 million to 3, then to 4, then to 5. After multiple conversations

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with my executive team, she was unable to get the budget down.
On a phone call with Procter & Gamble, I imagine there were eight or nine, maybe 10 people on that call, and ourselves, we were going through where we are with the budget. Procter & Gamble was not putting much in. We were the majority financiers. And I was very clear with her that we would not be making her movie if she couldn't get her budget down.
That was the extent of the conversation. There was no voice raised. It was me simply acting as the chairman at the time. There was no president, or I don't believe there was a CEO. And I just said, we won't be making your movie unless you get the budget down. And my understanding was that she was very unhappy with that and that she felt, what was relayed to me, that I threw her under the bus. Which is also very typical. I mean, directors are unhappy with studios all the time when people won't make their movies for the price. But that was -- genuinely, that was it.
And then I think maybe a month went by, and I sent her a voice note before day one of filming. I'm sure by now you're familiar with my

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voice notes.
Q Tell me more.
A Well, there was a voice note around the world I sent to Ms. Lively that everyone has heard, I guess.
And I sent her a lovely voice note saying how much I believed in her and the mission. And she responded, and we had a lovely text exchange. And we texted throughout most of production. To which point, I then came to visit.
Q When was the conversation that you had with Ms. Ayoub that you are recounting here?
A Before pre-production even began. I don't even know.
Q Before pre-production?
A Yeah, this was in the deal --
Q It was not on the --
A Sorry. This was in the dealing-making phase before there was even a contract, before we had agreed to even make the movie.
Q Okay. Before it -- before there was a set?
A There was no set. Yes.
Q It was on the phone?
A Over Zoom.

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Q Nobody else wanted Ms. Ayoub's movie?
A No.
Q You saved it?
A No. Like -- like very often, people come to us when other studios or companies don't believe in the films. And if we believe that it speaks to the mission of why we are here, we will take the risk.
Q You said "everyone around the world has heard my voice note to Ms. Lively"?
A I was making a joke. But yeah.
Q That's because you released it, right?
A Yeah. Actually, I did not release that. But...
Q You instructed someone to release it on your behalf?
A Actually, I did not.
Q You knew it was going to be released on your behalf?
A That's privileged.
Q Okay. Did there ever come a time in August of 2024 where you learned --
A Is this -- do you want me to get rid of this or you want --
Q You're free to do what you want with it.

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Did there ever come a time during August of 2024 when you learned that there was a woman on TikTok alleging that you invited her up to your hotel room years ago and some incident that occurred alongside that?
A I think I learned about that in Ms. Lively's complaint.
Q You had not -- no one had told you about that in August of 2024?
A I have no memory of that.
Q You have no memory of discussing with anyone at Wayfarer, anyone at TAG, or with Ms. Abel a social media post alleging that you had been -- that you had invited some girl up to a hotel room years ago?
MS. SHAPIRO: Objection.
THE WITNESS: Like I said, I believe I heard about it for the first time reading her CRD complaint.
BY MR. GOTTLIEB:
Q Okay --
A But if you have anything that can refresh my memory, I'm happy to look at it. But I --
Q Have you -- I'm sorry. Go ahead.
A Yeah.

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Q Have you reviewed that post since the filing of Ms. Lively's lawsuit?
A I have never seen it.
Q Do you have any idea what the -- what this woman alleged?
A From what I've been made aware since then, that I invited her to a hotel room.
Q Okay. Do you know whether that occurred or not?
A I have never invited a woman to a hotel room that wasn't my wife.
Q Have you ever invited a woman to a hotel room before you were married?
A No.
Q Never? You're sure?
A I wish I was that confident before I was married.
Q So the answer to my question is, you are sure that prior to your marriage and after your marriage, you have never invited a woman in any circumstance, in any capacity, up to a hotel room that you were staying in?
MS. SHAPIRO: Objection.
THE WITNESS: I am sure that before I was married or while being married, I have never invited

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a woman up to a hotel room that I was staying in.
BY MR. GOTTLIEB:
Q Okay. Who's Shane Norman?
A Presumably not the woman that you're talking about right now.
Q Who is Shane Norman?
A Shane Norman is a former employee of Wayfarer Entertainment.
Q And Wayfarer Entertainment was a predecessor company to Wayfair Studios?
A Correct.
Q And what was your role with respect to Wayfarer Entertainment?
A Founder -- co-founder.
Q What was Shane Norman's role with Wayfarer Entertainment?
A Shane Norman was brought on by our CEO at the time to assist with the building and the creation of, at the time, which was the beginning of Man Enough.
Q The podcast?
A There was no podcast. It was -- it was to help -- excuse me. It was to help in the launch of the book Man Enough, and to figure out ways that we could do activations and get more men involved.

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Q Did you know that Mr. Norman was being hired before he was hired?
A I knew -- yes. I -- I was introduced to Mr. Norman, and we had a job interview together. Yes.
Q Okay. You interviewed Mr. Norman?
A I did. Well, the last interview because he would be working with -- with me directly.
Q Okay. A number of people interviewed Mr. Norman; you were the final interview?
A Correct.
Q And you approved hiring him?
A I did.
Q You thought he would be good at the job for which you were hiring him?
A He presented fantastically.
Q Okay. And it didn't work out that way, right?
MS. SHAPIRO: Objection.
THE WITNESS: It did not.
BY MR. GOTTLIEB:
Q Mr. Norman was extremely abusive to women?
A I think you're referring to Mr. Sarowitz's testimony?

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Q I am.
A I don't know if I would characterize it that way. We discovered that he was very combative, and it had -- we had been made aware, after some time, which we were frustrated we didn't know earlier, that he had made several women cry. And he was not listening to their ideas.
Q Let me read you what Mr. Sarowitz said and ask you if it's true.
A Okay.
Q What Mr. Sarowitz -- sorry. Mr. Sarowitz, I had to learn how to pronounce his name.
Mr. Sarowitz said:
(As read):
"We had an issue where we had an employee who was extremely abusive to women. It got to the point where each woman that they got in a meeting with was left with tears."
Is that a truthful statement about Shane Norman?
A I don't know if that's a truthful statement. I don't know if every woman that he was in a meeting with was left in tears.

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Q Did that statement fairly capture the gist of Mr. Norman's behavior when he was employed by Wayfarer Entertainment?
A I can't speak to Mr. Sarowitz's intention with those words. But my understanding was that that is a -- maybe an exaggeration, but very well could be Mr. Sarowitz's view on what happened.
Q Would you agree with me that Mr. Sarowitz is a very thoughtful man?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And you were here during his deposition, for at least part of it, right?
A I was.
Q He considered my questions very carefully before he answered them; you remember that, right?
MS. SHAPIRO: Objection. Objection.
THE WITNESS: I do remember that. Yes.
BY MR. GOTTLIEB:
Q And seemed to me he was being truthful and trying to be accurate; is that your impression also?
A I'm not saying that he wasn't truthful.
Q But you are saying that he was

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exaggerating?
MS. SHAPIRO: Objection.
THE WITNESS: I said that in my opinion, having handled the situation alongside him, I wouldn't have characterized it in that way.
BY MR. GOTTLIEB:
Q Do you know he said a little bit later that there were many complaints made about Mr. Norman. And when I said, "many complaints, do you know about how many?" He answered: "Virtually every woman that they ever worked with."
Is that true?
A It's my understanding that Mr. Sarowitz was not directly involved in any of this, outside of when it finally came to our attention from the CEO. So he's free to express his opinion. But as the person that was there, I don't believe that that's a fair understanding of exactly what happened. I think it was far more nuanced than that.
Q Was an investigation performed?
A I believe so, yeah.
Q Did the investigation corroborate that virtually every woman that Mr. Norman worked with had complained about his behavior?
A I don't remember the full details, but I

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imagine it did. Yes.
Q Did the investigation provide a basis for removing Mr. Norman from the position he was in?
A Yes.
Q Did you agree with that?
A Yes.
Q Did you review the -- whatever the final report or recommendation was that described Mr. Norman's behavior?
A Yes.
Q Did you find that informative in understanding what had occurred?
A Yes.
Q And you found it informative in understanding what had occurred, even though you had been present for a lot of what occurred; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: Not correct.
BY MR. GOTTLIEB:
Q You weren't present for any of the incidents that were described in the report of the investigation into Mr. Norman's behavior?
A I was not.
Q That report was in writing?

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A Correct.
Q Do you know who conducted it or wrote it?
A An outside group of former attorneys who do HR, I believe.
Q Do you know who that was?
A I don't recall the name. Multiple women. I think it was two or three women.
Q Was it important to you that it was women who did that investigation?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember it being important to me.
BY MR. GOTTLIEB:
Q Well, you just brought it up right now. You said it was multiple women. I didn't ask you their genders. Why did your brain go to that?
MS. SHAPIRO: Objection.
THE WITNESS: If you have a neuroscientist here, we could ask him. I have no idea. But as I recall, I can give you my understanding.
I see things in pictures. So I'm very right-brained, I believe. And when I thought of the women who I had just seen in my mind on Zoom, they were, in fact, women. And so as my brain saw that

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they were women, I said women. I hope that answers your question.
BY MR. GOTTLIEB:
Q It does.
Did you support Mr. Sarowitz's decision about the employment action to take with respect to Mr. Norman?
A I did.
Q And you know that that employment action meant that he remained on with Man Enough in a consulting or part-time position for a number of months?
A Yes.
Q And he continued to be paid?
A Yes.
Q And you supported that?
A I did.
Q Who is Liz Plank?
A Liz Plank is my former co-host of the Man Enough podcast.
Q How long was she your co-host?
A Maybe three years.
Q What changed?
A What changed?
Q What changed that caused her to not be

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your co-host anymore?
A The -- I imagine The New York Times article and the entire world thinking I was a bad man.
Q Did she tell you that?
A No.
Q Did you talk to her when she quit?
A No.
Q Did you read anything that she wrote about why she didn't want to be a co-host anymore?
A I believe it was shown to me, yes.
Q Do you recall what it said?
A I can't recall exactly what it said, no.
Q Was it not important to you to understand why Ms. Plank wanted to discontinue a three-year-long professional relationship at that point in time?
MS. SHAPIRO: Objection.
THE WITNESS: Can you ask the question a different way?
BY MR. GOTTLIEB:
Q I can try. You said you didn't talk to her after she quit?
A No.
Q And you didn't reach out to her to talk

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to her?
A No.
Q You weren't interested in hearing from her her perspective on why she didn't want to be co-host of this podcast that was very important to you anymore?
MS. SHAPIRO: Objection.
THE WITNESS: That's not it at all.
BY MR. GOTTLIEB:
Q So what is it?
MS. SHAPIRO: Objection.
THE WITNESS: My memory, if it's correct, was that when she resigned from the podcast, she was asked -- she had asked to pass on that she didn't want anyone to reach out to her.
BY MR. GOTTLIEB:
Q Who did you hear that from?
A I believe the person who runs the Man Enough podcast.
Q Who is that?
A Tera.
Q Tera?
A His name is Tera. T -- yeah. Go ahead.
Q Sorry. First and last name, please?
A Right. I'm having a hard time thinking

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of his last name right now, forgive me.
Q Okay. So it's someone named Tera?
A Former. We don't currently have a Man Enough podcast, but he ran it, yes. And Jamey Heath was also the one who informed me.
Q Okay. So someone named Tera and Mr. Heath informed you that Liz Plank did not want to be contacted?
A That she didn't want anyone from the show contacting her.
Q Did they tell you why?
A No.
Q Did you ask?
A I assumed.
Q What did you assume?
A I assumed that she didn't want to have a conversation about why she left.
Q Okay.
A And I tried to respect that.
Q On the set of It Ends with Us, at any point in time did you have a practice of hugging people to start your day?
A I think some people would qualify me as a hugger.
Q Is that a yes?

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MS. SHAPIRO: Objection.
THE WITNESS: I wouldn't call it a practice. I also have a practice of high-fiving people so...
BY MR. GOTTLIEB:
Q My question was: On the set of It Ends with Us, at any point in time, did you have a practice of hugging people or giving hugs at the start of the day?
A I wouldn't call it a practice. But if you ask a different version of the question, I might give you the answer that you want.
Q Your lawyer is going to get really mad at you if you try to do that.
Are there any days that you can think of where you began the day by hugging multiple people at the start of the day's work?
MS. SHAPIRO: Objection.
THE WITNESS: Sure. Yes.
BY MR. GOTTLIEB:
Q On more than one day?
A Yes.
Q Was it every day on the production of It Ends with Us?
A Did I give a hug to more than one person

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on every day --
Q Every day. At the start of the day?
A I'm sure I did or got hugged. I don't know if it was exclusively giving.
Q Did Mr. Heath?
MS. SHAPIRO: Objection.
THE WITNESS: I wasn't with Mr. Heath all day, every day.
BY MR. GOTTLIEB:
Q Okay. On the first day of shooting, do you know if you greeted people at the start of that day, May 15th, 2023, with hugs?
A I don't. But I imagine I did and was given hugs too.
Q Cast members and crew?
MS. SHAPIRO: Objection.
THE WITNESS: Is that a question?
BY MR. GOTTLIEB:
Q Did you hug cast members and members of the crew on May 15th, the first day of production?
A I imagine hugs were exchanged between cast members and crew.
Q Including, perhaps, some people you had not met before?
MS. SHAPIRO: Objection.

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THE WITNESS: I'm not sure. I mean, maybe.
BY MR. GOTTLIEB:
Q Did you have any conversations before you hugged people on your set about whether they were comfortable with physical touching?
A Not any more than people had with me when they came to give me a hug. I think there is just a -- I think there's just an energy. Like, no offense, but I wouldn't give you a hug so. But I just think there's a human energy that two people maybe unconsciously exchange. I don't know if you believe -- I'm not saying you have to believe in energy. I'm just saying that I think there's a -- there's a human greeting when you're starting something that is going to be a journey, that's not going to be easy, where you're creating an environment. And oftentimes, like the way that I move through the world, I think I'm very open and people would oftentimes will hug me. Present counsel excluded.
Q No hurt feelings, sir.
You were the director of this film, right?
A Yes.

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Q And you're a supervisor?
A Yes.
Q And the policy that we walked through in some length before, one of the things it references in it is hugging. Do you recall that?
A I do recall that.
Q You also understand, because it's part of how you set up your studio, that there are power dynamics at play in the workplace, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And you also understand, because you've spoken eloquently and admirably about many of these topics, about violence and abuse, that there are some people that have deeply held traumas that they have not exposed or fully gone through or talked about, right?
MS. SHAPIRO: Objection.
THE WITNESS: Of course.
BY MR. GOTTLIEB:
Q And that might include somebody that has had a trauma that makes them just uncomfortable with being touched?
A Absolutely.

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Q Okay. You hugged Ms. Lively on multiple occasions on the set, right?
A Yes.
Q Every day?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q How many times would you estimate?
A That I hugged Ms. Lively?
Q On the set. So not outside of the set environment, but at work on the set?
MS. SHAPIRO: Objection.
THE WITNESS: Are these hugs -- I'm so sorry --
BY MR. GOTTLIEB:
Q Sorry. This is --
A Are these hugs that I initiated, or are these hugs that I was a recipient of?
Q You can characterize it however you'd like.
A I just want to be as accurate in my testimony as possible --
Q Okay.
A -- as it relates to the hugging. That was my question -- that was the question. Which

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one?
Q You can include hugs that you believe you initiated and hugs you believe Ms. Lively initiated.
MS. SHAPIRO: Objection.
THE WITNESS: Like lump them all together?
BY MR. GOTTLIEB:
Q Sure. Your best estimate.
A Okay.
Q Number of times.
MS. SHAPIRO: Objection.
THE WITNESS: Maybe a greeting and an exit. So at the most maybe -- again, I don't know. I don't know. I don't know. That's my answer to you, Mr. Gottlieb. I don't know.
BY MR. GOTTLIEB:
Q Fair enough. And when you don't know, that's what I always want your answer to be.
A I don't know.
Q Do you know who Vivian Baker is?
A Vivian Baker is Ms. Lively's makeup artist, I believe.
Q Do you know that she testified under oath in this case?
A I assume her testimony would be under

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oath.
Q Do you know that she testified under oath in this case?
A Yes.
Q Are you aware that she testified that there was a culture of hugging on the set of It Ends with Us?
A I am now.
Q Are you aware that she said that that made a number of people uncomfortable?
A I find that odd.
Q You find that odd, why?
A Because Mrs. Baker was often the one that would run up and give me a hug.
Q And because of that, you find it odd that she testified that a number of people felt uncomfortable with the culture of hugging on the set of It Ends with Us?
A Correct.
Q Do you remember earlier when you testified about the hot tub?
A You're referring to what? Sexually harassed?
Q When you were sexually harassed in the hot tub?

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A Yes.
Q Do you remember that moment when you thought, maybe I should do what this powerful person is suggesting that I ought to do?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know if I testified to having a moment where I thought maybe I should do what he's suggesting I do.
BY MR. GOTTLIEB:
Q Do you remember saying that to Glamour?
A I don't remember saying that to Glamour.
Q Do you remember thinking that for a moment?
MS. SHAPIRO: Objection.
THE WITNESS: I remember seeing his naked genitals inches away from my face before he walked and lowered himself into the hot tub and asked me to take off my pants.
MR. GOTTLIEB: Okay.
THE WITNESS: My shorts. I don't know if I remember feeling, should I? I remember feeling, how do I leave the situation?
BY MR. GOTTLIEB:
Q Do you think Ms. Baker was perjuring herself when she said that multiple people felt

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uncomfortable because of the culture of hugging on the set of It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure how my assumption of Ms. Baker's testimony would lead to perjury.
BY MR. GOTTLIEB:
Q Do you or do you not think she was being truthful when she said that multiple people felt uncomfortable about a culture of hugging on the set of It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: I think she was being truthful. That's not why I said I thought it was odd.
BY MR. GOTTLIEB:
Q Okay. Did you ever hear from anyone on the set of It Ends with Us that hugging, daily hugging, was making them uncomfortable?
A There was a point in time that I heard that, yes.
Q And when was that?
A That was from Ange Giannetti and, I believe, Alex Saks.
Q Do you recall when that was?

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A It was early on in production. Maybe first week or two.
Q Okay. So that's in May of 2023?
MS. SHAPIRO: Objection.
THE WITNESS: I have a feeling you know the date better than me. So, yes.
BY MR. GOTTLIEB:
Q And what did you do when Ms. Saks and Ms. Giannetti told you that certain people felt uncomfortable with the hugging on the set of It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: I stopped hugging.
BY MR. GOTTLIEB:
Q Did you perform an investigation?
A Because people didn't want there to be as much hugging?
Q That's my question.
A No.
Q Did you inform anybody in HR?
A I did not.
Q Even though hugging is one of the items that appears in your sexual harassment policy?
MS. SHAPIRO: Objection.
THE WITNESS: I was unaware of any

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official complaint of the hugging. In fact, quite the opposite.
BY MR. GOTTLIEB:
Q Again, and we did this before, you understand, because we had this exchange before, that an official complaint does not need to be filed in order for something to violate the Wayfarer Studios sexual harassment policy, right?
MS. SHAPIRO: Objection.
THE WITNESS: Correct.
BY MR. GOTTLIEB:
Q And you understand that there are supervisor responsibilities that apply --
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q -- that do not depend upon the filing of an official HR complaint, right?
MS. SHAPIRO: Objection.
THE WITNESS: Correct.
BY MR. GOTTLIEB:
Q Okay.
A But just to point you back to 9054, page 6, paragraph 1, 2, 3, 4, 5, 6. It says:
(As read):
"If any supervisor or manager becomes

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aware of a violation of this policy."
And I stand by the fact that I was not aware of any violation of the policy.
Q Okay. So you would need to -- under your understanding of the policy, you would need to determine, in your judgment, that the policy had been violated before you got HR involved?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe I was aware of any violation of the policy. If that were the case, then every single person on that set would have been reported to HR who engaged in any sort of hugging. Including, ironically, Mrs. Baker, who hugged, each time she saw me, post the incident where I was made aware of the hugging. Which made me feel very awkward.
BY MR. GOTTLIEB:
Q Okay. Is it your testimony that after this conversation with Ms. Saks and Ms. Giannetti, that there was no more hugging on the set of It Ends with Us that occurred, that you were a part of?
MS. SHAPIRO: Objection.
THE WITNESS: My recollection is, I was very aware once I was made -- once I was made aware

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that, I believe it was Ms. Saks and Mrs. Slate, specifically felt the set was too huggie. Hence, my feeling that there was no violation. It was a generalization, and I believe the word used was huggie or comfy. Which I think would have been a strange thing to report.
I remember very much being extra conscious and aware of the energy between who I were to approach on a daily basis and who I were to hug. I remember shifting to many more high-fives than hugs. Including solely for Mrs. Slate and Ms. Lively. So good morning, high five. I don't think there was ever a hug that took place between myself, Mrs. Slate or Ms. Lively after I became aware that the set was too huggie.
BY MR. GOTTLIEB:
Q In any prior movie you worked on or set you worked on, did the issue of hugging ever come up to your recollection?
A No.
Q This was the first time that you had ever had this issue raised, addressed, spoken about?
A This is the first time for many things, Mr. Gottlieb.
Q Did you ever tell Ms. Lively that you had

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spoken to her deceased father?
A Let me shift gears real quick. Please ask the question again.
Q Did you ever tell Ms. Lively that you had spoken to her deceased father?
A No.
Q And is that because -- is your answer no because, in your view, you told Ms. Lively that you had prayed to her deceased father?
MS. SHAPIRO: Objection.
THE WITNESS: No, I'm -- I'm talking about the context of the conversation and the multiple conversations that happened regarding Ms. Lively's, unfortunately, deceased father.
BY MR. GOTTLIEB:
Q Was there ever a point in time when you told Ms. Lively that you had communicated in any form with her deceased father?
A I insinuated to Ms. Lively in a conversation, where the previous day we had spoken about life after death and various things, which we don't have to discuss now, that I had prayed for her dad, and I had asked him to bless our movie.
Q Who else was there when you had that conversation with Ms. Lively?

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A This was at her -- I don't know what you call it. She used to call it Buckingham Palace, as she said, because so many celebrities walked through there. I think that was her office in her penthouse apartment, which was the place that Ms. Lively requested all of our meetings be. It was just her and myself.
Q It's your testimony that Ms. Lively used to refer to that as Buckingham Palace?
A That's what -- that's what her and Mr. Reynolds would call it.
Q Okay.
A They may have said it was something that Taylor Swift had said.
Q And so your testimony is that at a meeting in the office in Ms. Lively's apartment building, you shared with Ms. Lively that you had prayed to her deceased father?
MS. SHAPIRO: Objection.
THE WITNESS: For and asked, yes. Asked him to bless our movie.
BY MR. GOTTLIEB:
Q Is there any other time that you can recall that you mentioned to Ms. Lively communicating in any way with her deceased father?

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MS. SHAPIRO: Objection.
THE WITNESS: May I ask a clarifying question?
BY MR. GOTTLIEB:
Q Sure.
A What do you mean by "communicating"?
Q I think it's more important that I understand what you mean by "communicating."
A If communicating means a two-way conversation, is that what you're implying? That I'm suggesting to Ms. Lively that I had a two-way conversation with her deceased father?
Q I'm asking what you recollect saying to Ms. Lively. And so -- I don't want us to get tripped up on talking to, communicating. What did you express to Ms. Lively about whatever interaction or message or prayer -- what -- what did you express to Ms. Lively about her deceased father, any time other than what you just told me?
A May -- may I provide a little bit of context and then answer the question?
Q I can't stop you.
A You could.
Q Go ahead.
A I would give you consent.

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Q Go ahead, sir.
A The previous day in her office, as was customary, Ms. Lively and I were having conversations about all sorts of things. She was an actor, and I'm a director and I'm also an actor, and part of that is getting to know the person that you're acting with. This is something that all acting coaches and people I believe at a high level do. You get to know the person that you're working with.
And I was made aware that Ms. Lively's father had passed somewhat recently, I think within a few years. And I had imagined that it might be difficult to be making a movie for the first time since his passing, since I learned he was, like, an acting coach. So I asked her if this was the first film that she's made since he's passed. And she said, yes. And I -- I think I said something about that -- that must be hard. And what was he like? You know, I've always found it, in my years of experience being a human, that oftentimes it's nice to discuss the memories of the people who have passed, and from what I had heard, they were very close.
So just in a way of having a conversation

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with Ms. Lively to build a connection, as we were working together fairly intimately, so she shared a little bit about her dad. I remember asking if she had any spiritual beliefs or so. And then I asked if it was okay if I shared mine. And so I shared a very brief summary of my faith, specifically because I said that we have some really beautiful beliefs about life after death.
And so then I shared that, you know, I really believe that those of us -- the people in our lives, our loved ones who pass on, are closer to us now than they were when they were here. I gave her the analogy of the womb, and how in the Baha'i faith, we are told that when we are infants in the womb, we have our whole world of existence. We have -- we are developing things. We are developing our eyes, our ears. We are developing our skin, our lungs. We are developing all of these things, but we don't have any use for them in the womb world. All the while, we are co-existing in this world, so basically, a baby is in both places at once.
But we are aware of the baby in the womb, and we can pray for it, and we can influence it. And then I just explained that our belief is that when we die of the womb, we're born into this world

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and we need everything that we were developing. But when we die in this world, we only take with us our spiritual qualities.

But as it relates to her father, I was explaining that where we go next, which I believe you can call it heaven, or I believe you're Jewish, like most of my family, whatever you believe in or don't believe in, what I was explaining to her was that I believe that just like we could pray for the baby in the womb, I believe they can help us and pray for us, which is why all these little coincidences and miracles can happen.

So based on that conversation, which I actually went back and told my wife that Ms. Lively and I had a lovely conversation about life, she seemed very engaged. But also, she's an actress so maybe she wasn't.

That next morning when I came in, because I had prayed for her father, I let her know that. And so it was in the context of this larger conversation, which I summarized shortly. It was much longer than that, that I offered a prayer for her father and I asked him to bless our film because I believe that those who have passed on can still help us. I wasn't in any way saying that her and

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I -- him and I had, like, a conversation and bro'd out. And that wasn't at all the context, nor do I think if you were a witness in the room, you would have felt that way.

MS. SHAPIRO: Mr. Gottlieb, can we take a short break?

MR. GOTTLIEB: After I'm done asking a follow-up question to that answer, which was approximately six minutes long.

THE WITNESS: I'm sorry. I asked for -- I wasn't --

BY MR. GOTTLIEB:

Q You gave me context. I told you you could.

A I was only following directions.

Q I am noting that it lasted six minutes.

I am not interested in -- in this question, I am not interested in what you intended to communicate. I'm interested in what you recall specifically saying, the words you specifically recall saying.

And at any point in time that you can think of, did you say to Ms. Lively that you had spoken to or had a conversation with her deceased father?

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MS. SHAPIRO: Objection.

THE WITNESS: At no point in time, have I ever spoken to Ms. Lively and said that I had a conversation with her deceased father. Nor have I ever said to anyone that I've had a conversation with anyone who was deceased, as I was not born with that ability to speak to the dead.

BY MR. GOTTLIEB:

Q Okay. And I am almost --

MS. SHAPIRO: Can we please take a break?

MR. GOTTLIEB: I am almost done.

MS. SHAPIRO: One more question, and then we're taking a break.

BY MR. GOTTLIEB:

Q Do you recall ever saying to Ms. Lively after she referenced in a joke, tell my dad he owes me 40 bucks? Do you recall ever pulling $40 out of the coat of one of your pockets?

MS. SHAPIRO: Objection.

BY MR. GOTTLIEB:

Q Out of the pockets of one of your coats?

MS. SHAPIRO: Objection.

THE WITNESS: So I remember a very funny coincidence, and I don't believe it was $40. I believe it was 20. So I -- from my perspective, I

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remember that it was 20. And the reason I remember it was 20 was because on the way to her apartment, I found $20 on the road. And I remember it was 20 because I'm sure if you found 20 bucks, that's a very rare thing to find.

So she made a joke, as Ms. Lively often does, and so I made a joke back. And the conversation was, no way, I just found -- I just found 20 bucks. That was -- it was two people joking. And it was never intended, nor meant to be anything that was serious. And -- but I did find $20.

BY MR. GOTTLIEB:

Q I'm going to honor your counsel's request now.

MS. SHAPIRO: We're going to take a break.

THE VIDEOGRAPHER: We are going off the record. The time is 11:46 a.m.

(Recess.)

THE VIDEOGRAPHER: We're back on the record. The time is 12:09 p.m.

BY MR. GOTTLIEB:

Q Mr. Baldoni, yesterday you were asked a question about whether you've done any leadership

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training. I think you said something about doing leadership coaching at some point in your 20s?
A Yes.
Q Was any of that ever with an organization called Landmark?
A No.
Q Never had any affiliation with, attended any sessions with Landmark Forum?
A No.
Q Any recollection, as you sit here today, of who the leadership coaching or training was with?
A It was a man who I was referred to by somebody, just one on one.
Q Okay.
Back to It Ends with Us. In the course of production on It Ends with Us, did you ever invite the department heads to go to a bathhouse or spa with you?
A I -- I may have.
Q Do you have a recollection of it as you sit here today?
A Like in a formal way, like, to all the -- all the department heads?
Q Any invitation in any form?
A Yeah, I believe I did.

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MR. GOTTLIEB: Okay. I'm going to mark a document, a document that's been marked as Exhibit 22. It's a document bearing the Bates Nos. SPE_BL_2193 through 2197. It's a text exchange dated June 15th, 2024.
(Exhibit 22 marked for identification.)
BY MR. GOTTLIEB:
Q And I'm going to represent to you, Mr. Baldoni, that this is a text exchange between Alex Saks and Ange Giannetti. Ange Giannetti is the home --
A Okay.
Q -- home number that is blacked out there.
Why don't you take a look at this and then I will ask you some questions.
A Sure.
Q Have you had a chance to look at Exhibit 21, Mr. Baldoni?
A I believe this is Exhibit 22.
Q Thank you for correcting me. I'm terrible with the exhibit numbers.
Have you had a chance to look at what is marked as Exhibit 22?
A I have.
Q Do you see in Exhibit 22 on page 2194,

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which is the first page of the text exchange, Ms. Saks writes to Ms. Giannetti at 2:53 p.m.:
(As read):
"Justin was very dismissive of her when she wanted to direct and then used Jamey to try to manipulate her when he realized she couldn't. She should co-direct it after she got daddio going."
Do you see that?
A I do.
Q Do you know who Ms. Saks is referring to here?
A I could only assume.
Q Who would you assume she's referring to?
A Well, the director of Daddio was our writer, which was Christy Hall.
Q Okay. And so you understand her to be discussing you being very dismissive of Christy Hall?
MS. SHAPIRO: Objection.
THE WITNESS: I -- I see that Alex is saying that I'm dismissive of her in this text message to Ange Giannetti, yes.

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BY MR. GOTTLIEB:
Q Okay. Do you believe you were dismissive to Christy Hall?
A Not at all.
Q Do you see at 2:57 p.m., Ms. Saks says:
(As read):
"In short, she didn't feel respected as a female voice on the team. And on a movie like this, that felt especially bad"?
A I do see that.
Q Do you see that she also says -- "she," being Ms. Saks, says of Ms. Hall:
(As read):
"She's scared of a backlash. Who isn't?"
A I see that.
Q Did you understand, one way or the other, whether Ms. Hall felt disrespected as a female voice on the team?
A Not -- I didn't. Not until -- not officially until I read this just now.
Q And you testified earlier that Ms. Saks and Ms. Giannetti is who you learned the concerns or complaints, however you describe it, about the

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hugging, that they're the ones who told you?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And that was in May of 2023?
A I would presume so.
Q Okay. So you see that Ms. Giannetti, at 2:59 p.m. says:
(As read):
"So many things stacking up people are so upset or pissed off about. I cannot believe how they just keep on coming."
Do you see that?
A I do.
Q Is that consistent with your understanding of what was happening as of June 15th, 2024?
A I don't remember what was happening in June 15th, 2024 --
Q Okay.
A -- outside of --
Q Do you see where Ms. Saks says, I don't think he remembers --
MS. SHAPIRO: I'm sorry. I think you interrupted.

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BY MR. GOTTLIEB:
Q Oh, I'm sorry. I thought you were done.
A Outside of being isolated and kicked off my own film.
Q Okay. Do you see Ms. Saks says:
(As read):
"I think this is where the narcissism is dangerous, and I don't think he remembers honestly, or knows that he's doing anything wrong"?
A I see that.
Q Do you agree with Ms. Saks that you did not remember or knew that you were doing anything wrong?
A Can I ask what you're referring to?
Q I'm referring to Ms. Saks' words on June 15th, 2024.
A I can't begin to speculate about what Ms. Saks is referring to when she says "I don't think he remembers honestly, or knows that he's doing anything wrong."
Q Do you see at 3:01 p.m., Ms. Giannetti says:
(As read):
"With this many people and issues, I

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mean, they" -- I'm assuming that's they, T-G-E-Y -- "just keep coming"?
A Oh, yes.
Q 3:01 p.m.?
A Yes, I do.
Q And then Ms. Saks replies:
(As read):
"Him and Jamey have a way of making women and some men feel like shit."
Do you see that?
A I see that.
Q And she says:
(As read):
"it is deep because they sign the checks."
Do you see that?
A I do.
Q And by "sign the checks," she's referring to Wayfarer Studios paying for people's compensation on the film It Ends with Us, right?
MS. SHAPIRO: Objection.
THE WITNESS: I can't assume. I'm not on this text chain.
BY MR. GOTTLIEB:
Q Who did sign the checks?

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A Not myself.
Q Did Wayfarer Studios pay for people's salaries, compensation, on the film It Ends with Us?
A I would imagine so.
Q And you as the director and co-studio head had the authority to hire, fire, remove, and discipline people on the set if you chose to do so?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And then you see a reference at 3:05 p.m. by Ms. Saks saying:
(As read):
"Do you remember when I called Andy Davis a few weeks in and was like, 'Andy, he's inviting the department heads to go to Russian baths with him.'"
Do you see that?
A Yes.
Q Who is Andy Davis?
A I believe Andy Davis is the -- he might be the head of production at Sony Studios.
Q Okay. And on the next --
A The person in charge of production at

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Sony.
Q All right. And on the next page, Ms. Saks says:
(As read):
"I was like, 'what do I do?' He was like, 'you have to tell him he can't do that.' Everybody has something weird, uncomfortable, and bad to say."
Do you see that?
A Yes. I see Ange says that, yes.
Q Sorry. Ange said that:
(As read):
"Everybody has something weird, uncomfortable, and bad to say"?
A Yes.
Q Did Ms. Saks tell you that you weren't allowed to take people to Russian baths?
A No, she didn't.
Q Did anyone tell you?
A No, she didn't.
Q Did Ms. Giannetti ever tell you that many people had something weird or uncomfortable or bad to say about what was happening on the film?
A No, she didn't.
Q Did anyone?

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MS. SHAPIRO: Objection.
THE WITNESS: Not until I read about them like this.
BY MR. GOTTLIEB:
Q Are you troubled reading this now?
MS. SHAPIRO: Objection.
THE WITNESS: What do you mean by "troubled"?
BY MR. GOTTLIEB:
Q What would you have done if you had been handed this text chain on June 15th, 2024 between Alex Saks -- Alex Saks was the producer on the film, right?
A Yes.
Q And Ange Giannetti was the --
A Executive in charge.
Q Executive in charge?
A For Sony.
Q For Sony. So if you had known on June 15th, 2024 that in Ms. Giannetti's view, that everyone has something weird, uncomfortable, and bad to say about what was happening on your set, what would you have done?
MS. SHAPIRO: Objection.
THE WITNESS: On June 15th, the movie

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was already finished. And I believe anything that's referenced in this text exchange, if I'm not mistaken, either happened before the movie began as it relates to what you said about Christy Hall, or in pre-production. But I could be wrong.
BY MR. GOTTLIEB:
Q What would you have done, recognizing that, on June 15th, 2024, if you had seen this?
MS. SHAPIRO: Objection.
THE WITNESS: I can't speculate to what I would have done on June 15th because I didn't see it.
BY MR. GOTTLIEB:
Q Would it have changed anything about what you did after June 15th, 2024?
MS. SHAPIRO: Objection.
THE WITNESS: I can't answer that.
BY MR. GOTTLIEB:
Q Who is Russell? Do you see a reference to Russell at 3:07 p.m.?
A I do.
Q Who is Russell?
A Russell was our production designer.
Q Do you see that Ms. Saks says:
(As read):

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"Russell said when he wrapped, he felt like he left a cult"?
A I do see that.
Q Do you find that offensive?
MS. SHAPIRO: Objection.
THE WITNESS: It wouldn't be the first time people around this case have said I was in a cult.
BY MR. GOTTLIEB:
Q I think you testified earlier about meetings with Ms. Lively that occurred in her apartment; is that right?
A Yes.
Q Is that the first place that you met with Ms. Lively?
A The first place -- it was in the same building, yes.
Q In the same apartment building?
A In the building.
Q Different room but same building?
A Different apartment.
Q Different apartment, same building?
A Yes.
Q Okay.
A Am I done with this?

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Q Sure.
When was that meeting, the first meeting?
A Sometime in December before Christmas. Sorry. I think it was December 22.
Q And when you first met with Ms. Lively, she had not yet agreed to play the role of Lily in the film; is that right?
A Yes.
Q And you had not yet decided whether you were sure if you wanted her to play the role of Lily in the film, right?
A Correct.
Q You thought you did, though, right?
MS. SHAPIRO: Objection.
THE WITNESS: I thought I did what?
BY MR. GOTTLIEB:
Q When you went to that meeting, traveled to the meeting --
A Yes.
Q -- you prepared for the meeting?
A Yes.
Q And you discussed the meeting in advance with certain people?
A Yes.
Q Like Mr. Heath?

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A Yes.
Q And others?
A (Witness nods head.)
Q And is it fair to say that you were hopeful that you and Ms. Lively would reach an understanding and she would agree to play the role of Lily in the film?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And at that point in time, you had made the decision that along with directing the film, you would play the co-lead role in the film?
A Yes.
Q Is that the role of Ryle?
A Yes.
Q And before, I asked you if you were a producer and you said no, you're an executive producer; is that correct?
A Yes.
Q Okay.
A I was, but eventually I -- I wasn't.
Q You were for some period of time?
A Yes.
Q Okay. In the first meeting, along with

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other topics, you and Ms. Lively discussed your families; is that right?
A Yes.
Q And at the time, Ms. Lively was pregnant?
A Very pregnant, yes.
Q She was soon to give birth?
A Yes.
Q And that would not be the first time. Ms. Lively had children already, right?
A Yes. They were all over the apartment.
Q And Ms. Lively was pregnant with a boy; is that right?
A Yes.
Q And the two of you discussed certain things about Ms. Lively's baby?
MS. SHAPIRO: Objection.
THE WITNESS: Unborn baby, yes.
BY MR. GOTTLIEB:
Q Among other things, you discussed whether Ms. Lively's baby would be circumcised, right?
MS. SHAPIRO: Objection.
THE WITNESS: That was a conversation, yes.
BY MR. GOTTLIEB:
Q And in the context of that conversation,

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did you at any point share with Ms. Lively whether you were circumcised?
A Yes.
Q Did Ms. Lively ask you whether you were circumcised?
A Directly, no.
Q Who was present at the moment when you relayed to Ms. Lively that you were circumcised?
A There were people going all around. Mr. Reynolds was in and out of the conversation. She had, I think, two nannies. I felt like there was a housekeeper there. Her assistant was walking around. I think she had two assistants there. Her and I were sitting on the couch, but there was people all around.
Q Have you ever told any other work colleague at any point in time about your genitalia?
MS. SHAPIRO: Objection.
THE WITNESS: I don't talk about my genitalia, so no.
BY MR. GOTTLIEB:
Q Prior to Ms. Lively accepting the role of Lily Bloom, she received a copy of the script; is that right?
A Yes.

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Q And you did not write that script; is that correct?
MS. SHAPIRO: Objection.
THE WITNESS: Correct. I developed it with Christy Hall.
BY MR. GOTTLIEB:
Q Christy Hall was the screenwriter?
A Yes.
Q Okay. Do you recall when that script was sent to Ms. Lively?
A I assume before the meeting.
Q Do you know whether the script that Ms. Lively received before the meeting and prior to when she accepted the role of Lily Bloom was the same script that was used once you started shooting?
A It certainly was not.
Q Okay.
Did you have an understanding prior to the start of production whether the issue of nudity or sex scenes was important in any respect to Ms. Lively?
MS. SHAPIRO: Objection.
THE WITNESS: Can you say that one -- repeat the question?

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BY MR. GOTTLIEB:
Q Did you have an understanding prior to the start of production whether the issue of nudity or sex scenes were important in any respect to Ms. Lively?
MS. SHAPIRO: Objection.
THE WITNESS: I knew that Ms. Lively felt that the movie needed to be very sexy. But outside of that, I -- can you repeat the question one more time? I want to make sure I answer it correctly.
BY MR. GOTTLIEB:
Q Did you have an understanding prior to the start of production whether the issue of nudity or sex scenes were important in any respect to Ms. Lively?
MS. SHAPIRO: Objection.
THE WITNESS: Prior to the start of production, not -- okay. Prior to the start of principle photography, yes.
BY MR. GOTTLIEB:
Q Okay. And, in fact, I think you know that Ms. Lively had a series of conditions or principles in her -- in negotiating her offer that related to nudity or sex scenes?
MS. SHAPIRO: Objection.

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BY MR. GOTTLIEB:
Q Do you know that?
MS. SHAPIRO: Objection.
THE WITNESS: Are you referring to the nudity rider?
BY MR. GOTTLIEB:
Q Do you know anything about what Ms. Lively negotiated into her agreement prior to signing onto the role of Lily Bloom in the film, relating to sex scenes or nudity?
A I am aware of specific -- specific demands or requests as it relates to a document in, I believe, November. But that was after we had started filming.
Are you meaning before principle photography began?
Q Do you recall Mr. Heath ever sending you, in December of 2022, changes that Ms. Lively had made to her agreement relating to the role of Lily Bloom in It Ends with Us?
A No.
Q All right. So as you sit here today, you don't have a recollection one way or the other of whether Ms. Lively negotiated or otherwise insisted on certain conditions relating to nudity or sex

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scenes in the film?
A In December of 2022, I don't recall.
MR. GOTTLIEB: Okay. We're going to mark Exhibit 23.
(Exhibit 23 marked for identification.)
BY MR. GOTTLIEB:
Q Exhibit 23, Mr. Baldoni, please take a look through. And while you're looking through the record, I will note that Exhibit 23 is a document bearing the Bates Nos. BALDONI 26086 through 26090, which is an email exchange with an attachment.
Once you've had a chance to look, I will ask you some questions about it.
A Thank you.
Q Have you taken a few minutes to look over this document, Mr. Baldoni?
A I have. I have.
Q And Exhibit 23 is an email and attachment that Mr. Heath sent to you on December 23rd, 2022; is that correct?
A Exhibit 23 looks like an email from Lindsey Strasberg.
Q You see the very top of the page, sir?
A Oh, yes.
Q And do you see how it has a subject that

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says:
(As read):
"Forward: Blake Lively,
It Ends with Us, Role of Lily"?
A Yes.
Q And that forward at the top of the page is something that --
A Got it. I understand now.
Q -- Mr. Heath --
A Yes.
Q So this is a document that Mr. Heath sent to you on December 23rd, 2022?
A Apparently, yes.
Q Okay. And Mr. Heath has forwarded you the markup of the agreement from Ms. Lively's team relating to the role of Lily Bloom on It Ends with Us?
A Yes.
Q Okay. And in that markup, a few things.
Do you notice how on the page marked 26089, which is page 2 of the agreement, there is a section that is titled "Approvals."
Do you see that?
A Sorry. Where is it again?
Q It's on the page that is page 2 of the

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markup agreement. It says 26089 in the bottom right-hand corner. There is a section that says "Travel" --
A Yes. Yes.
Q -- and right underneath "Travel," you see "Approvals"?
A Yes.
Q And you see that it says in the marked up version:
(As read):
"Artists will have mutual approval rights over the following."
Then there's a sub-point A about hair, and then there's a sub-point B that's been edited to say simply, "the screenplay."
Do you see that?
A Yes.
Q And so it was important to Ms. Lively in this agreement, at least as it's being expressed here on December 23rd, that she would have mutual approval rights over the screenplay.
Do you see that?
MS. SHAPIRO: Objection.
THE WITNESS: I see what I believe is the first round of markups and negotiations from

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Ms. Lively's side.
BY MR. GOTTLIEB:
Q Okay.
A Because I also see it says, "Produced by credit on screen." So to me it looks like this was the first round of everything. It's like the wish list of everything that her team would want.
Q Okay. And do you have an understanding of whether Ms. Lively's ultimate agreement with Wayfarer included mutual approval rights over the screenplay?
MS. SHAPIRO: Objection.
THE WITNESS: I imagine it would.
BY MR. GOTTLIEB:
Q Then on the next page, Section 13, you see a number of items under "Miscellaneous"?
A Yes.
Q And this is on page 3 of the markup agreement, which is BALDONI 26090.
Do you see how Ms. Lively's team has written in here in sub-point A:
(As read):
"No use of the artist's name, voice, or likeness in merchandise."
And then, other things there without

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prior written consent?
A Yes.
Q Does that seem like a fairly standard provision that goes into these kinds of agreements?
MS. SHAPIRO: Objection.
THE WITNESS: I would imagine so.
BY MR. GOTTLIEB:
Q In your experience, is that a fairly standard provision that an actor would ask for?
MS. SHAPIRO: Objection.
THE WITNESS: I can't speculate. I'm not an expert in contracts.
BY MR. GOTTLIEB:
Q Something that would be important to you in one of your agreements?
MS. SHAPIRO: Objection.
THE WITNESS: No use of artist's name, voice, or likeness in merchandising without my consent?
BY MR. GOTTLIEB:
Q Yes.
A Yes.
Q Okay. You see Subsection D, "Approval of Press Releases and Statements"?
A Yes.

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Q Is that something that would also be important to you in a film you were co-leading?
A I'm not sure I have ever asked for that or thought that I could have that. But, again, I can't speculate. And I also -- do you have the final contract by chance?
Q I'm asking you about this document right now, sir.
A Okay.
Q Do you see how in Subsection E, it's written in:
(As read):
"No nudity/simulated sex, without artist's prior written consent and negotiation/execution of a nudity rider."
Do you see that?
A Very standard, yes.
Q That's very standard?
A Yes.
Q Okay. And you understood Ms. Lively to be asking for that as of December 23rd, 2022?
A Looking at this document, I understand that to be a -- yeah, being asked for it by her team along with all of the other things that were asked

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for here in red.
MR. GOTTLIEB: Okay. Let's do that, please. This is Exhibit 24. It's, thankfully, a short one.
(Exhibit 24 marked for identification.)
BY MR. GOTTLIEB:
Q Mr. Baldoni, you've been handed what's been marked as Exhibit 24, which is a document bearing the Bates No. BALDONI 30723 that is an email from Alex Saks to yourself, Jamey Heath, and Ange Giannetti with copies to others on March 28th, 2023. Subject line: "Sex Scene/Nudity Meeting."
A Yes.
Q Have you had a chance to look at this?
A This, I have, yes.
Q Okay. It's helpful that it's only two sentences.
A It is.
Q So Ms. Saks writes -- and this is an email Ms. Saks sent to you, Jamey Heath, and Ange Giannetti on March 28th, 2023?
A It appears to be.
Q Ms. Saks says:
(As read):
"Can the four of us hop on to discuss

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the above, in regard to Blake specifically, in the next couple of days?"
Is that right?
A Yes.
Q And the above is the subject line: "Sex Scene/Nudity Meeting"?
A Yes.
Q Do you understand what Ms. Saks was referring to or talking about in this email to you?
A I don't.
Q Do you have any idea whether any such discussion happened around March 28th, 2023?
A I remember there were many conversations trying to have these conversations. I don't remember specifically when it happened.
Q Okay. Do you have a recollection of a conversation about sex scenes or nudity happening at some point towards the end of March, start of April 2023?
A I remember a few conversations, yes.
Q Okay. Do you remember a few conversations with Ms. Saks, Ms. Giannetti, and any of the other people referenced here on this email?
A Yes.

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MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q Okay. Were those meetings that you recall and, as you sit here today, in person, on the phone, Zoom? What do you recall?
MS. SHAPIRO: Objection.
THE WITNESS: I don't -- I don't recall. I know we were in pre-production. So I think by this point, we were in the office. So some may have been in person; some may have been Zoom.
BY MR. GOTTLIEB:
Q Okay. You earlier testified about an initial meeting you had with Ms. Lively in December of 2022. This is now the end of March 2023.
Had you been working on edits to the script in between December of 2022 and March of 2023?
A Yes. Per Sony's direction.
Q How many different drafts of the script would you estimate you had gone through between the end of December 2022 and this point in March of 2023?
A I have no idea.
Q If we wanted to know the answer to that question, would there be an answer contained in

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digital form in any program or software that you all used for managing changes to the script?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not a technical expert in Final Draft. I imagine it would also be in the -- when I gave my laptop and phone and everything to the data people for the lawsuit.
BY MR. GOTTLIEB:
Q What program did you use for writing or making edits to the script?
A Final Draft.
Q Final Draft. And in that program, did you ever have occasion to go back and look at prior drafts to compare kind of where you were and where you'd been?
MS. SHAPIRO: Objection.
THE WITNESS: I believe so. Yeah, I had to learn Final Draft.
BY MR. GOTTLIEB:
Q And do you recall in Final Draft there being a function for notes and ways of indicating where changes had been made?
A Yes.
Q How -- to the best of your recollection, as you sit here today, how do you know looking at a

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script in Final Draft where changes had been made from the last draft?
A You would have I think the option to -- like as you type something in, it keeps what was there before and I think it puts like a strike through it.
Q There were stars on the side?
A There were stars on the side when it gets exported in the final, like the export, the final export.
Q Wherever you send out to --
A Yeah, because you wouldn't want it to have the strikes because that would be confusing. It would be too much dialogue.
Q Okay. So when you edit a script in this program and then you send it out for other people to review, the way that I would know if I were reviewing your new draft where changes had been made is that there would be stars --
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q -- on the side?
MS. SHAPIRO: Objection.
THE WITNESS: Correct.
MR. GOTTLIEB: Okay. Let's take a look

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at one example of that, and this will be Exhibit 25.
And Mr.Baldoni, I'm going to say this now before handing this to you because this is a script of the entire movie, I am not --
(Exhibit 25 marked for identification.)
THE WITNESS: You don't want me to read the whole script?
MR. GOTTLIEB: I'm not going to ask you to do a table read.
THE WITNESS: There you go.
THE STENOGRAPHIC REPORTER: Thanks.
BY MR. GOTTLIEB:
Q So Exhibit 25 is a document bearing the Bates Nos. BALDONI 3641 through 3759 and am I right, Mr. Baldoni, that this is a version of the script that has been sent from someone to you on or about April 10th, 2023?
A It appears so.
Q What's the "official clean white production draft"?
A The first -- I think white is the first color that you would have when you start to prep a movie.
Q Okay. And do you know who sent this to you from the production office?

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A Whoever was handling distribution.
Q Okay. So this is April 10th. Do you have any estimate or any recollection at all as you sit here today of how many different drafts the script had gone through from December of '22 until this point in April of 2023?
A Official drafts? I don't believe any official drafts.
Q Any drafts that had been saved on the system as a new draft?
A I couldn't -- I couldn't estimate.
Q Is it fair to say that you were tinkering with the script often during that period of time?
MS. SHAPIRO: Objection.
THE WITNESS: Tinkering wouldn't be the word I use.
BY MR. GOTTLIEB:
Q Revising?
A I was -- yeah, I was revising. Sure.
Q You were making edits, and I think you said earlier, in conjunction with Sony?
A In conjunction with the producers and also the writer, Christy Hall.
Q Okay. I want to direct your attention to page 47 of the script, which is the page marked with

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the Bates No. BALDONI 3690.
A Okay.
Q On page 47, I believe we were in Scene 39 and there is a description at the bottom of the page of a bedroom scene. Do you see where I am?
A Yes.
Q And do you see in that description of a bedroom scene a description of a sex scene between the characters Ryle and Lily?
A Yes.
Q What part of the movie is this?
MS. SHAPIRO: Objection.
THE WITNESS: This is the beginning of their romance, I believe. This is right as they are falling in love on screen.
BY MR. GOTTLIEB:
Q Did you write the words that appear from the bolded bedroom to the end of the page where you have an italicized:
(As read):
"These nearly two" -- "these two newly formed lovers" -- then italicized -- "become one"?
A I don't believe I did.
Q Who do you believe wrote that?

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A I believe those were Christy Hall's words.
Q All three paragraphs?
A I'm sure that I adjusted some words. This to me, my memory of it is, this was written and feels like Christy Hall's writing.
Q Do you know one way or the other as you sit here today whether this description of a bedroom scene between Ryle and Lily was in the script that was sent to Ms. Lively in December of 2022?
A My recollection is that many of the intimate scenes were worked on since that first draft that Ms. Lively had.
Q So that would be a no with respect to this scene?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know specifically this scene, if it was in the script or not.
BY MR. GOTTLIEB:
Q So your recollection is that many of the intimate scenes were worked on since the first draft sent to Ms. Lively in 2022, but you're not certain whether this was one of those scenes?
MS. SHAPIRO: Objection.
THE WITNESS: No, I believe I was

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answering your question about whether this scene was in the initial script or not.
BY MR. GOTTLIEB:
Q Okay.
A That's all.
Q So yes or no, was it?
A That's what I said, is I don't know if it was in the initial script.
Q Okay. But then in response to it, you also said --
A That's --
Q -- my recollection is that many of the intimate scenes were worked on since the first draft that Ms. Lively had?
A Correct.
Q So you're saying that many of the intimate scenes that were in the script --
A Yes.
Q -- that Ms. Lively saw in December of 2022 were scenes that you were working on in between December of 2022 and April of 2023?
A Correct.
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q Okay. Were you working on those scenes

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with Ms. Lively at that time?
A No, I wasn't.
Q Okay. You were working on them with Ms. Hall?
A Ms. Hall, Alex Saks, Andrew Calof, Ange Giannetti, Jamey Heath.
Q Okay. If you turn the page, one page, to page 49, you see Scene 42, Boston Grace Hospital, Hallway, Neurosurgery Floor."
You see that?
A Uh-huh.
Q And do you see a discussion of a scene at the hospital when Lily comes to see Ryle?
A Yes.
Q And there is an exchange there in dialogue where Lily says:
(As read):
"Hello there, Doctor."
Ryle says:
"Hey, I didn't expect to see you today."
And Lily (coy, sexy) says:
"Yeah, well, I think I need a physical. Maybe you can help me out."
Do you see that?

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A Yes.
Q Did you write that?
A I did not.
Q Who wrote that?
A This was specifically an idea that Christy Hall had when we were meeting together over two days in my office at Wayfarer.
Q Did you think it was a good idea?
A I think I did at the time. That's probably why it's in the script.
Q Did you ever change your mind about that?
A Change my mind about putting it in the script or that it was a good idea?
Q That it was a good idea.
A I'm not sure. I don't believe Ms. Lively liked it and so then we took it out.
Q Is there anybody else who didn't like it?
A I don't recall. I feel like it made the script because people liked it that were -- I was collaborating with.
Q What did you like about this?
MS. SHAPIRO: Objection.
THE WITNESS: About this scene?
BY MR. GOTTLIEB:
Q About that dialogue.

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A Oh. Well, I can't comment on the dialogue. The dialogue is -- much of dialogue like this is always a work-in-progress. Until an actress says it outloud, you don't know if it works.
But to answer your question, specifically, there was a request from Sony to add more sexy to the movie and we were constantly looking for ways to do it, that also fit into the budget because we had location constraints, time constraints. We could only be in certain places at certain times. As I remember, this specific instance was a little bit of the tail wagging the dog, because we were having to pay a lot of money to rent out a hospital, and there weren't enough scenes to shoot in the hospital.
And so as producers do and as a director does, we are trying to figure out how to give the co-studio the notes that they want which are, as an example, adding a sexy scene to help their relationship. And, also, the budget constraints of having enough to shoot in a hospital.
So when you put those two things together, I believe Christy had a great idea of, like, oh, maybe there is like -- you know, maybe she should play doctor, you know.

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And as I often did, she's a woman. She's a brilliant writer. I'm not going to argue with her of what is sexy or not. Because I wanted this to be from that gaze anyways. So I thought it was perfectly fine.
I will only also add that we were also constantly going back to the book to figure out how to adapt it in a way that made Ryle and Lily's relationship more sexual and Atlas' and Lily's relationship more romantic. Because we wanted them to be two very different situations.
So there was a lot more talk about making sure there was more Ryle and Lily because in the book, there is a -- by the time they get together, there is a lot more sexual interaction between the two. And we just didn't have nearly enough in the movie.
Q Is there a scene in the book that involves Ryle and Lily playing doctor in the hospital and then having sex in an exam room?
A No.
Q And I think your testimony was, it was a good idea to add this because it made good use of the amount that the studio was paying to the hospital for production?

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MS. SHAPIRO: Objection.
THE WITNESS: I don't believe that was my testimony.
BY MR. GOTTLIEB:
Q Would adding a sex scene not in the book be considered gratuitous?
MS. SHAPIRO: Objection.
THE WITNESS: No. Because none of the sex scenes that were in the movie as they currently exist were ever in the book in the way that they are.
BY MR. GOTTLIEB:
Q If you flip to page 81 of the script, which is BALDONI 3724.
Are you there with me, sir?
A Yes.
Q Do you see A69?
A Yes.
Q And that is a reference to "ARIA HOTEL, PENTHOUSE SUITE NIGHT"?
A Yes.
Q And this is wedding night for Ryle and Lily?
A Yes.
Q And you see towards the end of that, it's

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written:
(As read):
"As the two climax at the same time, they lock eyes and cannot help but smile, baffled that they found each other"?
A Yes.
Q Whose idea was it to add "the two climax at the same time"?
A Christy Hall.
Q When did she communicate that to you?
A We did it -- we were writing together. We were in a room in my office. We were specifically working on a lot of the sex scenes and --
Q What did -- sorry. Go ahead.
A And we -- yeah. This was -- we were writing a movie that was filled with romance and lust and intimacy and sex. And, again, these are all outlines, right, so a script has far less description than a book. So you have It Ends with Us, which has a ton of pages and very detailed descriptions of various scenes so that you can paint the picture in your mind. And all writers do. Which I learned a lot on this process, is you

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have to give some sort of outline so that as you're reading the script, you have an idea of what's happening. And then you work out all the details once you start production, both with the actress in accordance with what is standard for approval. And then after the actress, with the intimacy coordinators to figure out what each of these things really mean.
Q Did you ever have a conversation with anyone else, cast, crew, production on It Ends with Us about Lily and Ryle climaxing together, other than Christy Hall?
A I think I spoke about every single intimate sex scene with our intimacy coordinator.
Q Okay. So Ms. Hall, your intimacy coordinator --
A And then eventually, Ms. Lively.
Q Okay. And then Ms. Lively?
A Yes.
Q Do you ever recall having a conver -- so do you recall having a conversation with Ms. Lively about this specific line here?
A I don't recall it being about this specific line.
Q Do you have any recollection of having a

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conversation with Ms. Lively about the scene in which you discussed you and your wife?
MS. SHAPIRO: Objection.
THE WITNESS: I remember a conversation, not discussing a scene, where I brought up my wife, yes.
BY MR. GOTTLIEB:
Q And what do you recall bringing up?
A The day before I had a meeting with the intimacy coordinator, to go over ideas for all of these scenes, I wrote down a bunch of notes from that meeting. The following day, I had a meeting set with Ms. Lively to specifically talk about the sex scenes. That was the actual point of the meeting. In that meeting, I read through and walked through the notes that I had discussed with the intimacy coordinator.
One of them was an idea that had come up where Ryle and Lily were making love. Lily had climaxed or had an orgasm, to speak frankly here, and Ryle did not. And the idea, as the intimacy coordinator and I were talking about things that women have not seen on camera yet, things that would be unique, that would be attractive to the female gaze, which was the purpose of that meeting, the

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idea was that Ryle would then stop and say "just watching you was enough" or "I'm good" or something like that.
When I shared that with Ms. Lively, she then made it personal and said ,"Oh, God, that would mortify me if that happened to me." To which I then responded, as one does because when you're two grown adults with children who are married in the context of talking about sex scenes, with a movie that you're making with a person who is understanding that there are going to be sex scenes in a book based with a lot of sex in it, the only thing you really have to share are personal experiences. So I said, "Oh, well, some of the most beautiful moments have been when that's happened with me and my wife." And that was it.
Q So you were interested in shooting the scene from the female gaze?
A I was interested in shooting all the sex scenes from the female gaze.
Q Did Ms. Lively have a female gaze?
A I would imagine so if she's a female.
Q Did you believe she had one?
A Of course.
Q Did you believe that that gaze was

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important in incorporating ideas about how these various scenes should be shot?
MS. SHAPIRO: Objection.
THE WITNESS: Absolutely. That's why I incorporated all of Ms. Lively's ideas without hesitation.
BY MR. GOTTLIEB:
Q And it's your testimony that when you say Ms. Lively said she would be mortified, that you believe she was referring to?
A If that happened to her, were her words.
Q If that happened to her in her personal life?
A Yes. It was a personal comment. Like it was inferring that if -- she was inferring that if her husband didn't finish, if she didn't finish her husband or climax her husband, that she would be mortified.
Q That's what --
A That's what she said. So she said, "Oh, that would mortify me if it happened to me."
Q Your recollection as you sit here today about a meeting that occurred in April of 2023?
MS. SHAPIRO: Objection.
THE WITNESS: I would imagine that's the

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date.
BY MR. GOTTLIEB:
Q Okay. Your recollection is that you specifically recall Ms. Lively saying about herself personally, she would be mortified if the events described in the scene happened to her in her personal life?
MS. SHAPIRO: Objection.
THE WITNESS: Yes. That's why I then shared what I shared. That was -- and that was a very normal thing for Ms. Lively. You are two adults, two professionals, having a conversation, and one of the only things you have is your personal experience. So I didn't think anything of it.
BY MR. GOTTLIEB:
Q Did you ever tell Ms. Lively that Christy Hall was working with you on drafts of the script in April of 2023?
A My recollection -- bless you.
My recollection is that Ms. Lively was on spring break and we didn't -- I don't think we were in that much communication. But I don't -- I don't know.
Q So you don't know if you ever told Ms. Lively that one way or the other?

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A I imagine I did because I oftentimes told her I'm not a writer, and I was kind of in this position where I was having to write.
Q Okay. You imagine you did. But earlier, we talked about it's your recollection that matters. So do you have a recollection?
A I don't have a specific recollection of a conversation where I said to Ms. Lively that Christy was helping me.
Q Okay. But you did tell her that you had worked on ideas for these scenes with an intimacy coordinator?
A That was the entire context of the meeting we had at her place.
Q And who was the intimacy coordinator?
A Lizzy Talbot.
Q Did you read Ms. Talbot's deposition transcript in this case?
A No.
Q Have you ever talked to Ms. Talbot about her recollection of any of the events relating to the script or production in this case?
A No.
MR. GOTTLIEB: Okay. I think it is about lunch time. So why don't we go off the record?

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THE VIDEOGRAPHER: We are going off the record. The time is 1:05 p.m.
(Lunch recess.)
(continuing)
AFTERNOON SESSION
TUESDAY, OCTOBER 7, 2025
---0O0---
THE VIDEOGRAPHER: We're back on the record. The time is 2:02 p.m.
BY MR. GOTTLIEB:
Q Did there come a time in May of 2023 where you learned that Jenny Slate and Ms. Lively had made concerns known regarding comments that you had made on the set?
A In May of 2023? I believe, yes. Yes.
Q Who told you about Ms. Slate and Ms. Lively's concerns?
A Ange Giannetti. Alex Saks.
Q Separately or together?
A Separate conversations.
Q With Ms. Giannetti, was that a conversation in person?
A No.
Q On the phone?
A Yes.

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Q How about Ms. Saks?
A Phone.
Q Okay. What do you recall Ms. Saks telling you about Ms. Slate's concerns?
A I recall her having lunch with Ms. Slate and saying that Ms. Slate -- she listed a few things. She said Ms. Slate had not appreciated the recording that I had made during pre-production with her and Ms. Lively. She had not appreciated a comment that I had made on-set regarding her wardrobe, something she was wearing. I believe she also said that Ms. Slate didn't like that I was interacting with the fans outside. There was a lot of fans when we were shooting. And then, on certain breaks I would go and just say hi to them because they were out there all day.
And if I recall correctly, she was saying to Ms. Saks that she didn't want to be asked to go out and do that as well because she was a private person. So she was asking to not interact with -- to be asked to interact with the fans. I don't know if it was Alex or Ange who told me that she had felt the set was too huggie or comfortable or whatever. I know huggie was a word that was used because I remember the word.

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That's the best of my recollection at the moment.
Q So between Ms. Saks and Ms. Giannetti, you were told that Ms. Slate thought the set was too huggie, yes?
A You asked me about just Ms. Saks, so I was just answering for Ms. Saks.
Q I thought you just said you weren't sure if it was Ms. Saks or Ms. Giannetti that said that?
A Oh, no. I thought your original question was to recount what Ms. Saks told me. If I misheard that --
Q That's fine.
A -- I thought you were breaking the two up.
Q Did Ms. Giannetti's description of Ms. Slate's concerns differ in any material respect to you?
MS. SHAPIRO: Objection.
THE WITNESS: Slightly.
BY MR. GOTTLIEB:
Q In what way?
A I specifically recall -- to further answer your question, it was a FaceTime.
Q With?

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A Ms. Giannetti.
Q Okay.
A It was not a phone call.
Q So a FaceTime with Ms. Giannetti. What do you recall that's different?
A What's different is that Ms. Giannetti had told me that she had asked Ms. Slate if she wanted to file a report, if she wanted her to do something with it. That was not something that was -- that Alex had said anything about. To which Ms. Slate said, no. Ms. Giannetti had also said on that call that when Ms. Slate had said that I had commented on her wardrobe and used the word "sexy," that Ms. Giannetti asked if she felt it was sexual or if I was hitting on her, and she said, no, it wasn't sexual. She just didn't appreciate it.
That's how in my recollection -- oh, and I believe it was from Ms. Giannetti that I had heard that Ms. Slate didn't appreciate the way that Jamey or Mr. Heath had offered to pay for her additional housing, as he was talking about the sanctity of motherhood. And I wasn't there, so I don't know. But she didn't like that, I guess.
Q And so before when you were testifying about what Ms. Saks told you, you had mentioned a

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comment about a wardrobe. That comment about a wardrobe included the use of the word "sexy"?
A Correct.
Q And your testimony is that that comment was about the wardrobe choice?
A I don't think that's what I said.
Q Okay. We'll get back to your description of that in just a moment.
Am I correct that in response to receiving this information from Ms. Saks and Ms. Giannetti, you sent a message to Ms. Slate?
A Well, this was the first I had heard about it. Ms. Slate had not come to me directly, and I felt -- I felt terrible, and I wanted to apologize. But I also didn't want to burden her with that or make her uncomfortable. And so I thought it would be best, based on the kind of the power dynamic and the awkwardness of it, to actually send it to Alex so that I didn't have to, like, force her to accept my apology or something. So I was just trying to be respectful. And so, yes, I sent Alex a message to send to Ms. Slate.
Q You didn't want to make Ms. Slate uncomfortable by sending her a message directly?
A Yes.

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Q And that's because you understood that Ms. Slate was already uncomfortable in certain respects?
MS. SHAPIRO: Objection.
THE WITNESS: Well, I understood that since she had shared that she had not appreciated some of my behavior. As soon as I was aware of it, I didn't want to add to that in any way. So I wanted to send it to her so I didn't, like, create anymore discomfort.
BY MR. GOTTLIEB:
Q Anymore discomfort?
MS. SHAPIRO: Objection.
THE WITNESS: Yes. Correct.
BY MR. GOTTLIEB:
Q Okay. And you were also informed about Ms. Lively's discomfort as well, correct?
MS. SHAPIRO: Objection.
THE WITNESS: Not from Alex Saks.
BY MR. GOTTLIEB:
Q From whom?
A Ange Giannetti.
Q Let's bracket that and come back to it. Let's continue on Ms. Slate for a moment.
A Okay.

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MR. GOTTLIEB: I want to show you a document. This will be Exhibit 26.
(Exhibit 26 marked for identification.)
BY MR. GOTTLIEB:
Q Mr. Baldoni you've been handed what's been marked as Exhibit 26. This is a document bearing the Bates Nos. BALDONI 31947 through 31950.
A Uh-huh.
Q And this is a text exchange between you and Alex Saks; is that correct?
A It appears to be.
Q The date is May 30th, 2023; is that correct?
A May 30th, 2023, yes.
Q Okay. And do you see at the bottom of page 31948 at 9:46 p.m., you ask Ms. Saks if you can send your notes to Jenny and Blake?
A I do.
Q And then, do you see on page 31949, you send two draft notes to Ms. Slate and Ms. Lively?
A I do.
Q You send them to Ms. Saks, draft notes to --
A Yes --
(Cross talk.)

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Q -- to Ms. Slate and Ms. Lively?
A -- I send them to Ms. Saks, yes.
Q Okay. And in the note to Ms. Slate, that you're asking Ms. Saks to send, you say:
(As read):
"I recognize the last few days of filming have been difficult, but I wanted you to know that the work is really great and I'm excited for what we're creating."
Were you being straightforward and truthful when you said that the last few days of filming have been difficult?
A Yes. I said:
(As read):
"First off, thank you for putting in -- putting your all into the film."
And then I said:
(As read):
"I recognize that the last few days of filming have been difficult."
So that was -- well, it was -- they were -- yeah, they were difficult, so I was being truthful, of course.
Q Those few days had been challenging on

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the set?
A Every day on a movie set is honestly challenging, but those few days, yeah, there were a lot of big challenges those few days, production wise.
Q Then you say:
(As read):
"Equally important is that I was made aware of your concerns. I wanted you to know they are fully received. I hear you and adjustments will be made accordingly."
And your reference there to your concerns, are those the concerns that you had just listed out to me that you had been relayed from Ms. Saks and Ms. Giannetti?
A Correct. The ones involving myself, yes.
Q Are there any other concerns that as you sit here today, you can think of that you could have been referring to other than the ones you just testified about?
A Specifically, I -- I was answering your question as it related to Jenny Slate, so if you're talking about concerns in general...
Q What I'm talking about is your reference

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here to your concerns. And all I'm trying to understand, sir, is if other than what you just testified to, there's anything else you can think about that you were referring to when you wrote "your concerns"?

MS. SHAPIRO: Objection.

THE WITNESS: I would go back to a previous question, and then I would -- I would include a concern that wasn't, I don't think, mentioned to me from Alex. But if you're asking if I was inferring anything, there was a instance that happened with Ms. Lively on set as well, where I also used the word "sexy" in relation to wardrobe that Ms. Slate was there for. So I would lump that into the overall concerns.

BY MR. GOTTLIEB:

Q And you knew that Ms. Slate was concerned about that comment as well to Ms. Lively?

A Ms. Slate and I had a conversation with Ms. Lively about that comment.

Q Okay. And Ms. Slate told you she did not appreciate or feel comfortable with that comment?

A Those -- I don't believe those were the words she used.

Q What were the words she used?

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A I believe she -- I don't have the exact words, but it had to do with, in general, we are -- it's like, we are -- the collective, we are staying away from using those words to describe, you know, women's bodies. It was like a -- in kind of like a -- Ms. Slate is a very funny woman, kind of a disarming, joking kind of way. But it wasn't your words. So I just...

Q Do you think that was Ms. Slate's female gaze?

MS. SHAPIRO: Objection.

THE WITNESS: Do I think her words --

BY MR. GOTTLIEB:

Q Objection to describing her wardrobe as sexy would constitute her female gaze on that particular situation?

MS. SHAPIRO: Objection.

THE WITNESS: Yes.

BY MR. GOTTLIEB:

Q Did you have a different gaze from your male perspective?

A I don't know if it's possible that I can have a different gaze as a male. So I'm sorry, I don't know what you're asking.

Q So Ms. Slate, not you, would know from

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the female gaze, the impact of having somebody say that you're -- you look sexy in a piece of clothing?

MS. SHAPIRO: Objection.

THE WITNESS: That's not what I said to Ms. Lively. But absolutely, Ms. Slate would have a female gaze and I would not.

BY MR. GOTTLIEB:

Q Would Ms. Lively have one?

A As I said earlier, so long as Ms. Lively identifies as a female, she would have a female gaze.

Q Okay. Do you see -- were any of the concerns that were reported to you by Ms. Slate provided to anyone in HR at Wayfarer Studios?

A To my knowledge, no.

Q You did not report any of the concerns that Ms. Slate had raised with you to anyone in the HR department at Wayfarer Studios?

A I did not.

Q Do you see that you've also written a note to Ms. Lively here?

A I have.

Q And you essentially use similar language here with respect to Ms. Lively's concerns; is that right?

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A Yes.

Q You say:

(As read):

"I want you to know that I've been made aware of your concerns and I hear you. They are fully received and adjustments will be made imminently."

Do you see that?

A Yes.

Q And you say:

(As read):

"The dailies are looking wonderful and while the last two days were tough, I assure you that your work was fantastic."

Do you see that?

A Yes.

Q And you say:

(As read):

"I truly believe you're creating one of your most honest performances that will have a long lasting and powerful impact."

Do you see that also?

A I do.

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Q Were you being dishonest when you wrote this to Ms. Lively?
A No.
Q You believed all of that?
A Yes.
Q You did not believe as of May 30th, 2023, that Ms. Lively's concerns had been fabricated?
MS. SHAPIRO: Objection.
THE WITNESS: The concerns -- well, I don't think we've talked about her concerns yet, but...
BY MR. GOTTLIEB:
Q The concerns to which you are responding here when you say:
(As read):
"I've been made aware of your concerns and I hear you. They are fully received and adjustments will be made imminently."
With respect to those concerns that you're saying that you've been made aware of and they are fully received and adjustments will be made imminently, those concerns were not fabricated, right?

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MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q You believe Ms. Lively made those -- communicated those concerns to you -- had -- let me strike that.
You believed that Ms. Lively communicated those concerns in good faith?
MS. SHAPIRO: Objection.
THE WITNESS: I believe that the primary concern, also being COVID, the reason that I was told she called Ange Giannetti, is a very valid concern. I was made aware of the -- that she also didn't appreciate the use of the word "sexy," but also that I apologized in the moment, and in her own words, we were good because we had actually discussed this in person afterwards. The majority of the concerns that I took seriously had to do with the way the set was being run. She was very adamant when she spoke to Sony about the firing of the first AD, she wanted a change.
So it was my understanding that the majority of the phone call with Ms. Giannetti had to do with COVID, and the firing of the first AD. And those were the concerns that I can recall being

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aware of, which I do not believe were fabricated and she had every right to feel the way that she felt.
BY MR. GOTTLIEB:
Q Including her concern with respect to your use of the word "sexy"?
A She has every right to feel that way about that word, but I also -- that was something that we worked through immediately on the spot.
Q And I appreciate that, but to underscore the point, it's your testimony as you sit here today that Ms. Lively's concern with respect to your use of the word "sexy," that wasn't something she made up to take control of the film, right?
MS. SHAPIRO: Objection.
THE WITNESS: I do not believe she made up the instance where I used the word "sexy" to describe specifically her wardrobe, no, I don't.
BY MR. GOTTLIEB:
Q And Ms. Slate's concerns were not made up so that Ms. Lively could take control of the film, right?
A No. I also can't speak to what Ms. Lively's intentions were at the time.
Q I want to show you -- did you ever talk to Ms. Slate after sending this message? Did you

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ever talk to her about this situation or her concerns directly?
A I didn't feel it was appropriate to put her in that situation. So from that point on, I gave her high-fives and complimented her on her work and didn't hug her and never used the word "sexy" again.
MR. GOTTLIEB: I want to show you a document. I will mark it as Exhibit 27. And Exhibit 27 is a document bearing the Bates Nos. JS 224 through 225, which is a text message dated May 27th between Jenny Slate and Josh Pearl.
Take a minute to read that.
(Exhibit 27 marked for identification.)
BY MR. GOTTLIEB:
Q And Mr. Baldoni, I appreciate that looking at some of this may be difficult. This -- who is Josh Pearl, first of all?
A I don't know.
Q The text that we were looking at in the prior exhibit, which is Exhibit 26, and the messages that you had sent to Ms. Slate and Ms. Lively was from May 30th. This is an exchange on May 27th; is that right?
A It appears to be.

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Q And were you aware by May 27th that Ms. Slate felt -- she says:
(As read):
"I am not scared or anything, just repulsed and deeply irritated."
Were you aware that's how she felt as of May 27th?
A No.
Q Were you aware that --
A Actually, I'm sorry. I would like to correct that for the record. I don't know the date that Alex said anything to me or that I talked to Ange. So if, in fact, it was the 26th, I don't want to speak incorrectly. So I don't know what I felt or what I knew or didn't know on the 27th. It very well could have been.
Q You might have known that she was deeply irritated by then?
A No. I don't know what day Alex and her had lunch. So I'm unsure what -- I'm just talking about the date. That's all.
Q You characterize before how the "sexy" comment was described to you; is that right?
MS. SHAPIRO: Objection.

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BY MR. GOTTLIEB:
Q Your understanding of -- your understanding of Ms. Slate's understanding of the "sexy" comment as told to you by Ms. Saks and Giannetti; is that fair?
A Yes.
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q Okay. Do you see at 10:24, Ms. Slate characterizing that comment in her own words?
A Yes.
Q And do you see there she says:
(As read):
"At that point he had made the comment to me about looking sexy, but I had decided just to try to push past it even though it made me feel so unsettled and deeply, deeply disappointed and irritated"?
A I do.
Q Did you know that's how Ms. Slate felt?
A I didn't.
Q How does it make you feel now knowing that that's how Ms. slate felt in that moment?
MS. SHAPIRO: Objection.

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THE WITNESS: Sad.
BY MR. GOTTLIEB:
Q You talk before about your desire to tell the story through the female gaze; is that correct?
A It was a desire, yes.
Q Why did you choose a male director?
A Well, for some time I was actually looking for a female director. I went back and forth from the very beginning of if I should direct or not. Originally, I had optioned the book to direct it, and that was the original plan. And that was back in 2019 or so. And culturally, the conversation changed very fast, and so I thought maybe I shouldn't direct it. So there was a period of time where I wasn't going to direct it.
And then, in the developing of it with Christy Hall, and in speaking to many of the women in my life and women who do specific work as it relates to gender, I sought advice. I started feeling like I was seeing the movie and what was possible. And I thought if I could surround myself with the right team, that there was actually something that I could do justice to because it wasn't solely a female story. There also were elements that I believe could be really helpful to

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men.
So ultimately, because I had the rights to the film and it was ultimately my decision and in consultation with friends and my wife and team, ultimately I believed in myself enough to take on the role.
Q You thought you would be the best person to direct this film?
A At the time I did.
Q Did Colleen Hoover ever tell you that she wanted the director of It Ends with Us to be a female?
A My recollection from the very beginning was that Colleen Hoover knew I was going to be directing this film. That was why she gave me the rights.
Q So my question is, at any point in time, did Colleen Hoover ever tell you that she wanted the director of the film to be female?
A I don't remember a conversation like that. It may have happened, but I feel like I would remember.
Q Okay. Do you recall ever having a conversation with anyone where they told you maybe the director of this movie should be a female?

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A I think during the time that I was just discussing where there was big shifts culturally, yes, which is why we were looking for a female director for quite some time.
Q Okay. But ultimately, you decided you were better positioned to tell the story?
MS. SHAPIRO: Objection.
THE WITNESS: I wouldn't characterize it that way at all.
BY MR. GOTTLIEB:
Q Do you recall ever saying to Brandon Sklenar on the film set, something to the effect of, I have to tell you something but I don't want to get canceled or lose my job. You can't say anything on this set anymore?
A I have heard that in someone else's testimony, and that is not something I said. That's also not the way that I speak.
Q Whose testimony did you hear that in?
A I believe Jenny Slate's.
Q Did you come to ever feel like you couldn't be open or candid or unfiltered on your set?
A Yes. But not for any reason that it's inferred in that text, nor would I ever say anything

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to Brandon Sklenar like that.
Q So if somebody said they heard you say that, your under-oath testimony would be they are mistaken?
A My under-oath testimony is that I don't believe I ever said anything to that -- to that effect to Brandon Sklenar.
Q Did you say to Ms. Slate when you made the "sexy" comment, that you could say that because your wife was there?
MS. SHAPIRO: Objection.
THE WITNESS: My recollection of the "sexy" comment was that it was all kind of said in one sentence.
BY MR. GOTTLIEB:
Q And what was the one sentence?
A Ms. Slate walked in. As a director, I was doing whatever I was doing, getting the set ready. I looked over to her. She was wearing a -- I believe black leather pants, which were designed to, I'm sure, look sexy. And without thinking, I said something to the effect of, oh, wow, those pants look sexy on you. And my memory, if it serves me correctly, I then -- my wife was in the room nearby. And I think in my head I was like, oh,

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maybe I shouldn't have said that. And I said, and I say that as a married man with my wife in the other room. Because I did not want it to come off in any way like it apparently did. So I was just -- in that moment it was just an instance where I said something that I was like, ah, I probably shouldn't have said that. And just tried to not make it super awkward and made a bad joke at the end of it.
Q What you just described to me, I probably shouldn't have said that, my wife's in the other room, is that something you said outloud or is that in your head what you were thinking?
A Well, I was -- it was like an internal dialogue --
Q Internal dialogue?
A -- like a -- it just came out. It was an instance where I said something without thinking.
Q Okay. Have you ever discussed, in the context of the events of this film, and what happened on set, have you ever discussed trying to describe them as a component of neurodivergence?
MS. SHAPIRO: Objection.
THE WITNESS: That being an instance, yes.

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BY MR. GOTTLIEB:
Q And what is it about that instance that you believe is a -- well, first of all, how are you neurodivergent?
A I've been diagnosed with ADHD combined.
Q Do you take medications for that?
A I do.
Q Are any of those medications stimulants?
A I believe -- I'm not 100 percent sure, but it might be, yes.
Q Is that a daily medication?
A Yes.
Q Were you on that medication at the time of production of It Ends with Us?
A I was not.
Q Okay. Is that why you suggested to your publicists at one point, trying to go on a podcast or a show of some kind and have a discussion about how what you had been accused of was because of your neurodivergence?
MS. SHAPIRO: Objection.
THE WITNESS: I was never going to go in a show to talk about what I have been accused of. I remember specifically, one being very interested in general to go on a certain show. I believe his name

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is Dr. Amen, who literally saved the life of one of my best friends. And the things that at the time, I knew I was being -- I don't think accused of is the right word, but I knew that I had these instances that had made, as an example, Ms. Slate feel uncomfortable or, at the time, Ms. Lively, had to do with the few instances where I made the mistake of saying something where I didn't think fully.
BY MR. GOTTLIEB:
Q Is that something you describe of as impulsive speech?
MS. SHAPIRO: Objection.
THE WITNESS: I think it could be characterized as that; although, I'm not a therapist.
BY MR. GOTTLIEB:
Q Would it surprise you to learn that in talking with some people from your publicist team, you described going on that show of that doctor in order to discuss some of the things you had been, quote, "accused of"?
MS. SHAPIRO: Objection.
THE WITNESS: That would surprise me because that was not something that I specifically ever said. I never said I wanted to go on a show to

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discuss things I'd been accused of.
BY MR. GOTTLIEB:
Q You never said, most of what I've been accused of could be explained by your neurodivergence?
MS. SHAPIRO: Objection.
THE WITNESS: Feel free to correct me if I'm wrong, but what you just said is not what you had asked me previously.
BY MR. GOTTLIEB:
Q Well, I'm just focused on the words "accused of." And you seem to be saying that you've never described what happened on the set of It Ends with Us in those terms. I'm trying to understand if that's what your testimony is.
MS. SHAPIRO: Objection.
THE WITNESS: No, my testimony is specific to your question, which was, did I ever try to go on a show to specifically discuss the things that I was accused of on the set of It Ends with Us.
BY MR. GOTTLIEB:
Q Okay.
A So to answer your question, no. And I do believe that the other answer to your question is that impulsive speech could absolutely be and is

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oftentimes the reason for someone like myself saying something that I didn't fully think through.
THE WITNESS: Are we done with these?
MR. GOTTLIEB: I think so.
THE WITNESS: What about the script?
MR. GOTTLIEB: Your call.
THE WITNESS: All right. I'll save it.
MR. GOTTLIEB: Mr. Baldoni, you've been handed what's been marked as Exhibit 28. Exhibit 28 is a document bearing the Bates Nos. JONESWORKS 13502 through 13503. It's a text exchange on June 24, 2024 between yourself, Ms. Abel, and Matthew Mitchell.
Please take a look. Once you're done, I will ask you some questions.
(Exhibit 28 marked for identification.)
THE WITNESS: Okay.
BY MR. GOTTLIEB:
Q You've read the document marked as Exhibit 28?
A I have.
Q This is a text exchange between you and Ms. Abel and Mr. Mitchell on June 24th, 2024?
A Correct.
Q This is before the premiere?

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A Yes.
Q This is before any of the social media controversy about the premiere and the events surrounding the premiere had surfaced; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: I'm unsure.
BY MR. GOTTLIEB:
Q And you write at 12:52 p.m. on the 24th to this group that you're thinking about the Dr. Amen -- is it Amen or Amen?
A I think it's -- I don't know. Amen.
Q We'll use Amen.
You want to do The Dr. Amen Show. You say:
(As read):
"With everything going on, I want to have an offensive move showing my neurodivergence and some of the attributes that come with it so that I can start talking about it. Most anything that I have been 'accused of' is social awkwardness and impulsive speech, and I think me sitting down with him and just looking at my brain

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and talking about some of these things will be helpful for me."

Do you see that?

A I do.

Q You wrote that?

A I did.

Q What had you been accused of as of June 24, 2024?

A So what I put in quotes there is because I haven't been accused of. That's why I put it in quotes. So there was nothing I had been officially accused of; hence, the need for quotation. I believe by this point, I was made aware of the unfollowing. And something that I had been working on over the last year and a half in therapy, was my neurodivergence, and a lifetime of being undiagnosed and the suffering that comes along with that.

And so what I'm suggesting here, is -- first of all, The Dr. Amen Show had reached out to me independently. And I had been wanting to do it because it's very expensive to get the brain scan done, and they were offering it for free, number one. In some way I think I was justifying why to do it with my team. And I also thought it would be really helpful, as I've done with everything else in

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my life, to use my own experiences and shortcomings or, in this case, neurodivergence to help other people feel seen.

So yeah, it would have been helpful for me to sit down and have him scan my brain and tell me specifically what is going on.

Q Your testimony is that when you wrote this at 12:52 p.m. on June 24th, that when you said, "most anything I have been accused of is social awkwardness and impulsive speech," you were referring to a null set?

MS. SHAPIRO: Objection.

THE WITNESS: I'm sorry?

BY MR. GOTTLIEB:

Q Well, you said in response to my question, that the reason you put accused of in quotes is because there had nothing you had been officially accused of; hence, the need for quotation. And then you said, "I believe by this point, I was made aware of the unfollowing."

So is it -- maybe I'm misunderstanding your testimony.

(Cross talk.)

A What does null set mean? I don't understand what that means.

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Q Maybe I'm misunderstanding your testimony. Is your testimony that you had not been officially accused of anything as of this point?

MS. SHAPIRO: Objection.

THE WITNESS: I hadn't been accused of anything. There had been, if you will, illusions to things. But there has not been like an accusation of sorts.

BY MR. GOTTLIEB:

Q Is what you were saying to your team here that the thing you wanted to get ahead of were insinuations about your conduct?

MS. SHAPIRO: Objection.

THE WITNESS: I think that I wanted to make it very public because I had spent the last decade using the things I was struggling with to help people. I wanted to also show that I had been diagnosed as neurodivergent, and like so many people, I struggle with it. And I thought it could be really helpful to myself but also to others.

BY MR. GOTTLIEB:

Q You know what it means to get ahead of a problem or get ahead of an issue, right?

A Yes.

Q You had concerns as of this point, by

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late-June, that something might come out publicly about what had happened on the set of It Ends with Us, correct?

MS. SHAPIRO: Objection.

THE WITNESS: By this point in late-June, Ms. Lively had acknowledged that everything on round two had gone perfect. We had gone through the edit. By this point, I had had my film taken from me. I was excluded from finishing my own movie. Not being able to sound mix color, even approve the final picture. The cast had begun unfollowing me, and I was also told that I was not going to be sure if I was going to be attending the premiere. I did not know what was possible because nobody was saying anything. It was all whisperings. And I was preparing for absolutely anything.

BY MR. GOTTLIEB:

Q By this point in late June of 2024, did you understand that it had been insinuated that you had sexually harassed Ms. Lively or that you had engaged in sexual harassment on the set of It Ends with Us?

MS. SHAPIRO: Objection.

THE WITNESS: I had never thought of the words "sexual harassment." There had been

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insinuations of various things, but done in a way that didn't actually say anything.
BY MR. GOTTLIEB:
Q Not insinuations of sexual harassment; is that what you're saying?
MS. SHAPIRO: Objection.
THE WITNESS: The word "sexual harassment" or anything around sexual harassment, first time I ever saw that was in The New York Times and when you emailed me.
BY MR. GOTTLIEB:
Q Okay. I want to be very clear. The words "sexual harassment" never occurred to you in respect to what Ms. Lively had described happened on the set until you received her complaint; is that your testimony?
MS. SHAPIRO: Objection.
THE WITNESS: I can't say it never occurred to me. It was very clear that Ms. Lively was insinuating things that came to a return-to-work document, but to answer your question, I can't say if I ever thought she was insinuating the word "sexual harassment" or not. I don't know.
BY MR. GOTTLIEB:
Q Do you ever recall communicating to

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anyone that you thought sexual harassment was being insinuated or suggested about you or your conduct?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure, but I know that I certainly didn't agree with -- or the insinuations.
BY MR. GOTTLIEB:
Q If you had thought that sexual harassment was being insinuated, suggested, would you have wanted some kind of an investigation to be done or to exonerate yourself?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure.
BY MR. GOTTLIEB:
Q I'm going to mark a document. Before I do, Mr. Baldoni, I see you have a drink in front of you.
A Yes.
Q That's a drink called "Update," right?
A Yes.
Q Are you a sponsor or a promoter of Update?
A A sponsor?
Q Yeah.
A What do you mean by a "sponsor"?

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Q Have you ever done promotions for that drink that is sitting in front of you here today?
A I'm an investor in it.
Q You're an investor?
A Yeah.
Q Have you ever done social media posts or any kind of product endorsements for that drink?
A I may have done a story, probably at some point.
Q Did you ever do a story or promotion about that drink during the marketing of the film It Ends with Us?
A Actually, I think -- I think I had given one to my publicist, Jen, and she was wired, and she liked it. So I did a story of her drinking it. I did, yes.
Q She was wired?
A She was, like, enjoying it. She was like enjoying the drink.
Q It's a stimulant, right?
A It's a non-caffeinated stimulant.
Q Are you aware of how relentlessly Ms. Lively has been savaged for promoting her hair care products during the marketing of It Ends with Us?

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MS. SHAPIRO: Objection.
THE WITNESS: I'm aware that's part of -- I don't know if I would ever use the word "savaged," but I'm assuming you mean, like, had negative press.
BY MR. GOTTLIEB:
Q Have you ever commented on Ms. Lively's marketing of her products during the time that It Ends with Us was being promoted and marketed?
A Publicly?
Q Publicly or privately?
A I'm sure I did privately.
Q Have you ever said it was tone deaf?
A I don't know if I said those words, meaning they came from me or if I was repeating that that's what I had heard, but I'm sure -- I feel like that's what it was, yes.
Q Do you know if your team has ever criticized Ms. Lively for the marketing of her hair care products during the launch of It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: I think they have.
BY MR. GOTTLIEB:
Q You thought, in fact, that Ms. Lively deserved to be criticized for promoting her hair care products around the same time that

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It Ends with Us was released, didn't you?
MS. SHAPIRO: Objection.
THE WITNESS: I wouldn't -- I don't think that's a fair characterization of what I thought.
BY MR. GOTTLIEB:
Q You were happy that Ms. Lively was attacked for promoting her products during the launch of It Ends with Us; were you not?
MS. SHAPIRO: Objection.
THE WITNESS: I don't think that's a fair characterization of what's...
MR. GOTTLIEB: I'm going to show you what's been marked as Exhibit 29.
(Exhibit 29 marked for identification.)
BY MR. GOTTLIEB:
Q Exhibit 29 is a document bearing the Bates Nos. TOSKOVIC 089 through TOSKOVIC 103. This is a text exchange between yourself, Mr. Heath, Ms. Toskovic, Ms. Abel, and others on August 5th, 2024.
Do you see on the first page there, you have sent through a picture of an Update drink?
A I have.
Q That's the same drink you've got in front of you now, right? Different flavor?

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A It's a different flavor.
Q Same drink, different flavor?
A Yes.
Q And then you -- is this your social media team that you're texting with on this chain?
A I believe it was at the time.
Q You and the social media team talk about a social media post, which I think it looks like an Instagram story; is that right?
A That's correct.
Q And the comment on one of those that appears on page 091 is:
(As read):
"It Ends with movie press tour, Day 1. Gotta fuel up with drink Update."
Do you see that?
A I do.
Q It says:
(As read):
"Keeps me energized without the caffeine."
Do you see that?
A Oh, yes. On the second page, I do.
Q So you were promoting -- August 5th was the first day of the press junket; is that right?

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A I don't know the first day of the press junket.
Q That's the same day you gave an interview with Elle UK magazine in which you used the word "friction"?
A I probably did 20, 30, 40 interviews that day. I don't know, but I imagine it was the same day.
Q Okay. Do you see on page 93, if you flip further in, there's a picture of you --
A I'm just going to continue to read, if you don't mind.
MR. GOTTLIEB: I do not mind.
(Interference of audio from Zoom attendee)
MR. GOTTLIEB: What is that? Can you mute? Can you mute everyone.
THE VIDEOGRAPHER: Ms. Strasberg?
BY MR. GOTTLIEB:
Q You can turn back to page 93.
At the bottom, do you see a picture of yourself there?
A I do.
Q I think I recognize that hotel. It's a hotel in New York City you're standing in?
A Yes.

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Q I like that hotel.
A Me too.
Q You've got a very good-looking outfit on. And in the caption, there are different brands that are tagged there; is that right?
A Styling and grooming -- oh, sorry. Yes.
Q Do you see the different brands that are being -- for top, pants, shoes, watch, and necklace?
A Yes.
Q And those are meant to be tagged in a social media post?
A Yes.
Q To let people know what you're wearing, right?
A Yes.
Q That's pretty standard during the promotion -- well, that's fairly standard when you're wearing clothes, movie star, promoting a film, to let people know what brands you're wearing?
A This was fairly new to me, but I believe it's standard for movie stars.
Q Did you ever get any backlash that you can recall for being insensitive or tone deaf for promoting a drink in which you were an investor or clothing that you were wearing in connection with

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your promotion of the film It Ends with Us?
MS. SHAPIRO: Objection.
THE WITNESS: To my knowledge, I don't know if there is a direct link between the molecule paraxanthine and -- comes from caffeine and domestic violence. So I don't believe there was any backlash for me posting one Instagram story about this drink.
MR. GOTTLIEB: I will move to strike that as nonresponsive.
BY MR. GOTTLIEB:
Q My question was, did you ever get any backlash that you can recall for being insensitive or tone deaf for promoting a drink in which you were an investor or clothing that you were wearing in connection with your promotion of the film It Ends with Us; yes or no?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not going to answer the question the way it was framed.
MR. GOTTLIEB: You have to. It's my deposition.
MS. SHAPIRO: Objection. Mr. Heath [sic], just answer it however best you can.
MR. GOTTLIEB: He's Mr. Baldoni.
MS. SHAPIRO: Sorry.

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MR. BACH: He should answer it too.
THE WITNESS: Who am I?
Can you ask it again?
BY MR. GOTTLIEB:
Q It's a yes-or-no question.
Do you recall ever receiving any social media backlash for your promotion of that drink on August 5th, 2024?
A I don't recall any backlash to me posting about Update.
Q Do you recall any backlash for you tagging TAG Heuer, Manolo, another brand, David Yurman, in connection with this picture that was posted on August 5, 2024?
A I don't recall any backlash specific to my outfit or the text, no.
Q Okay. Can you ever recall anyone telling you that they thought doing this, nodding to products in connection with a very serious movie, was insensitive or tone deaf?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q Is that gendered?
MS. SHAPIRO: Objection.

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THE WITNESS: May I answer the question?
BY MR. GOTTLIEB:
Q It's the reason I asked it.
MS. SHAPIRO: Objection to the commentary.
THE WITNESS: I don't believe it's gendered.
MR. GOTTLIEB: All right. I think we've been going for a while. Why don't we go off record.
THE VIDEOGRAPHER: We are going off the record. The time is 2:58 p.m.
(Recess.)
THE VIDEOGRAPHER: We're back on the record. The time is 3:25 p.m.
BY MR. GOTTLIEB:
Q What character did Isabella Ferrer play in the movie?
A She played young Lily Bloom.
Q Was young Lily Bloom under the age of 18?
A The character was under the age of 18.
Q That's what I meant. The character, young Lily Bloom, was under the age of 18 or supposed to be depicting someone under the age of 18?
A Correct.

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Q Was there a sex scene involving young Lily Bloom?
A Yes.
Q Did you attend Ms. Ferrer's deposition?
A Parts of it.
Q Did you attend the part where she testified under oath that after she and Alex Neustaedter filmed a sex scene, you went up to them and said, I know I'm not to say this -- I know I'm not supposed to say this, but that was hot?
A I heard that part, yes.
Q Was that true?
A I have no memory of saying that to them.
Q Do you believe Ms. Ferrer is a truthful person?
MS. SHAPIRO: Objection.
THE WITNESS: I have no way of knowing.
BY MR. GOTTLIEB:
Q If you said that, could you understand how Ms. Ferrer could be taken aback or upset by that comment?
MS. SHAPIRO: Objection.
THE WITNESS: As a director, I probably say -- go up to actors in between scenes 100 times a day, and whatever I said in that moment was

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attempting to make them feel good about what they just did and comfortable. I don't think the context of the way I said it was offensive at all.
BY MR. GOTTLIEB:
Q Okay. Did you ever do any writing on the script during the period of the writers' strike?
A That is when the majority of the changes were made, yes.
Q Including changes that you made?
A Yes.
Q Did you ever ask while you were making changes to the script during the strike to have your name removed from the draft of the script?
MS. SHAPIRO: Objection.
THE WITNESS: On the contrary, I remember thinking that I should put both my name and Ms. Lively's name on it. And then I was told that we should probably have it removed, and in place, put Ange Giannetti's name.
BY MR. GOTTLIEB:
Q And you did that, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And the reason for doing that -- and you

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have a very good memory -- the reason for doing that was to show solidarity with the strike; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe that to be the reason.
BY MR. GOTTLIEB:
Q Would you be surprised if there was an email where you said that the reason for taking your name off of the script was in order to show solidarity with the strike?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know if I'd be surprised at anything at this point.
BY MR. GOTTLIEB:
Q That's not one of the documents you reviewed in preparation for --
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q -- your testimony today?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not allowed to comment on the documents that I reviewed.
BY MR. GOTTLIEB:
Q You are allowed to comment if it was a

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document that you reviewed in preparation for your testimony today.
MS. SHAPIRO: No. I'm instructing you not to reveal what, if any -- which, if any, documents you were shown by your attorneys, which is protected by the privilege, work product.
THE WITNESS: I'd be happy to see the document.
BY MR. GOTTLIEB:
Q You're going to follow your attorney's instruction on that?
A I like to do that, yes.
Q Did you ever cross picket lines?
A I think every time I was on set during the writers' strike, I was crossing the picket line.
Q Did you ever ask anyone else to cross picket lines during the writers' strike?
A We only asked people to cross if they were comfortable crossing.
Q Is that a yes?
MS. SHAPIRO: Objection.
THE WITNESS: I didn't personally ask anybody to cross a picket line, no.
BY MR. GOTTLIEB:
Q But Wayfarer Studios did?

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MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q If they were comfortable?
MS. SHAPIRO: Objection.
THE WITNESS: I would say the production. It was very clear to everybody that if they didn't want to cross, they didn't have to cross. That was my understanding of it, but I wasn't in charge of that.
BY MR. GOTTLIEB:
Q Did you ever tell Ms. Abel or Ms. Nathan, who were out talking to the press about Ryan Reynolds crossing picket lines and violating Guild rules, that you yourself had crossed picket lines and violated the terms of the writers' strike?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember ever saying Ryan Reynolds crossed a picket line.
BY MR. GOTTLIEB:
Q Did you ever mention to Ms. Abel or Ms. Nathan at all that you had written on the script during the writers' strike?
A I think Ms. Abel was aware that I wrote.
Q Why do you think that?
A Because Ms. Abel was aware that both

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myself and Blake wrote. I had told her.
Q Did you tell her that you had also -- Wayfarer Studios had also asked people who were comfortable to cross picket lines to come to work?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember a specific conversation with Ms. Abel about that.
BY MR. GOTTLIEB:
Q We talked a little bit earlier about a comment using the word "sexy" involving both Ms. Slate and Ms. Lively, right?
A Yes.
Q The comment to Ms. Lively, am I right that that occurred during the filming of the bar scene?
A The onesie bar scene, yes.
Q The onesie bar scene.
And is it correct that you made a comment that Ms. Lively, her dress -- and I'll let you characterize it -- looked sexy or hot?
A No.
Q What did you say?
A It wasn't a dress. So I was just answering your question.
Q I didn't mean to say "her dress," but it

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appears from the transcript, I did.
How would you characterize your comment using the word "sexy"?
A In a conversation where I was speaking to Ms. Lively about her wardrobe, as the director, I wanted to see the onesie because all the characters were wearing onesie's. She had a large jacket on, and we were having a bit of a negotiation, as I was trying to gently ask her to remove it.
And like many conversations with Ms. Lively, there's a back-and-forth that can go on for quite some time. And it got to the point where I believe I said to her that it looked hot, to which she replied -- earlier, she had said she thought it was cute, and that's why she wanted to wear it. And then I had said it -- down the line, I had said it looked hot. And she said, That's not what I was going for.
And then I made a joke. I said, sexy? She goes, Not that either. And then immediately, I paused, and I said, I'm sorry, did I just cross a boundary? And Mrs. Slate shared what we talked about earlier, to which case I thanked them both. I apologized to Ms. Lively again.
And I was in the middle of, you know,

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getting everything ready. I think at one point I let Ms. Lively know that she had something in her teeth before filming, because we were getting ready to go shoot. And then I came back later, five minutes later, before we started filming, and I thanked Mrs. Slate for what she said.
I said that was -- I said something along the lines of, That can't be easy. I wish you didn't need to say what you said, and I really appreciate you sharing that with me. And I apologized again to Ms. Lively for using the word "sexy" as it related specifically to her character's wardrobe.
Q Were the cameras recording when that exchange happened?
A The cameras for the movie?
Q Any cameras.
A I believe there was some behind-the-scenes cameras filming, yes.
Q Have you watched the video from that exchange?
A I have.
Q Have you produced the video from that exchange in this case to Ms. Lively?
A I believe every single piece of video as it relates to the movie was produced from my

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attorneys.
Q When did you last watch that scene, that recording?
A January maybe.
Q You didn't mention anything about missing the HR meeting. Did you say anything about missing the HR meeting?
A Yes, I did. In response to Jenny Slate's kind of -- as I mentioned earlier, joke, as she was saying, We don't say that anymore, I immediately responded and said, I guess I missed the sexual harassment meeting.
Q Did you miss the sexual harassment meeting?
A That's why I made the joke, because I did not miss the sexual harassment meeting.
MR. GOTTLIEB: All right. Let's look at a document.
(Exhibit 30 marked for identification.)
BY MR. GOTTLIEB:
Q This is a document that's been marked as Exhibit 30, another text exchange between Ms. Saks and Ms. Giannetti on June 1st, 2023. And it bears the Bates No. SPE_BL 2026 through 2035. And I'm really only going to be asking you, Mr. Baldoni,

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about the exchange on page 2028. Actually, sorry. It's -- there is a little bit of carryover on 2027.
A I would still like to read the whole document, if possible.
Q I'm just trying to help direct your attention. So go ahead and read.
MS. AHOURAIAN: Mr. Gottlieb, did you mark this as 30 or 31?
MR. GOTTLIEB: 30.
MS. AHOURAIAN: Thank you.
BY MR. GOTTLIEB:
Q Have you had a chance to read this entire document, Mr. Baldoni?
A I just did, yes.
Q And this is a text exchange between Ms. Saks and Ms. Giannetti on June 1st, 2023?
A It appears to be.
Q You saw one of the things they were discussing was Ms. Saks' belief that they needed new ADs on the film immediately?
A Yes.
Q And she wasn't saying, in what you just read, that Ms. Lively was telling her there needed to be new ADs, right?
A No.

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Q That was Ms. Saks' view?
A That is, I did not read her saying anything about Ms. Lively wanting new ADs.
Q On the first two pages of this document, do you see Ms. Saks recounts a conversation that she participated in between Ms. Lively and Mr. Heath?
A Yes.
Q And she describes that as a tough chat?
A That's what she says.
Q And says:
(As read):
"Called Jamey out in front of me and Justin kindly, but was very direct"?
A I see that.
Q Did you witness that conversation?
A I believe I did.
Q Do you see on page 2028 at 9:42 p.m. -- or, a.m., sorry -- 9:42 a.m., Ms. Saks begins to describe -- well, she says:
(As read):
"You, Jamey, make jokes about how you can't make eye contact with people anymore, as if to undermine and lessen the importance of people not wanting to be cozy" -- "comfy, cozy on the set."

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Do you see that?
A Yes.
Q Did you ever make jokes about being unable to make eye contact with people on the set anymore?
A I did not.
Q Did Mr. Heath?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know what Mr. Heath did.
BY MR. GOTTLIEB:
Q Okay. And then she describes a meeting that took place on day two in which Mr. Heath went into Ms. Lively's trailer.
Do you see that?
A I see that.
Q Is what Ms. Saks describes here an accurate reflection of what Ms. Lively said during that meeting that you witnessed?
MS. SHAPIRO: Objection.
THE WITNESS: I was -- I'm sorry. Say that one more time?
BY MR. GOTTLIEB:
Q The description of what Ms. Lively said and how she described the meeting in the trailer

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that you see here on this page 2028, is that an accurate reflection of what you recall Ms. Lively saying?
MS. SHAPIRO: Objection.
THE WITNESS: I think that's why I'm a bit confused, because you said "Ms. Lively."
BY MR. GOTTLIEB:
Q Ms. Saks is describing something Ms. Lively said, right?
A I'm sorry. Before, you said "Ms. Lively."
Q I know. Let's start at step one.
A Yes.
Q We can agree that Ms. Saks is describing something Ms. Lively has said?
A Yes, yes, yes.
Q And that was something Ms. Lively said in a conversation that you witnessed, correct?
MS. SHAPIRO: Objection.
THE WITNESS: Okay. Is what -- if I can repeat the question, and tell me if I'm right. If what Alex Saks is texting Ange Giannetti here, if this is what I remember Ms. Lively saying in the meeting that I witnessed?

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BY MR. GOTTLIEB:
Q Right now, I'm not asking you about what happened in the trailer. I'm asking you about your recollection --
A This is accurate.
Q -- of the meeting that you witnessed and whether this description is an accurate reflection, as you sit here today, of the meeting that you witnessed?
MS. SHAPIRO: Objection.
THE WITNESS: I don't think it's fully accurate.
BY MR. GOTTLIEB:
Q Okay. Let's go step by step.
Do you recall Ms. Lively saying that on day two, Mr. Heath went into her trailer?
MS. SHAPIRO: Objection.
THE WITNESS: I don't recall her saying that on day two, Mr. Heath went into her trailer.
BY MR. GOTTLIEB:
Q Do you recall Ms. Lively telling a story about Mr. Heath entering her trailer?
A Yes.
Q Do you recall her saying, Oh, actually, I'm getting body makeup done, or something to that

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effect?
A I recall the way she told the story was that when he entered, she said, Come in, but I'm getting body makeup done, so please turn away.
Q And that's more or less what Ms. Saks is saying in 943. She says, "you can come in if you don't look"?
MS. SHAPIRO: Objection.
THE WITNESS: Again, I don't remember her saying, "you can come in if you don't look." That doesn't feel accurate to me.
BY MR. GOTTLIEB:
Q Okay.
A Nor does this next piece. That's -- that's -- that's all I'm saying, is my recollection was this is -- this is like four lines in a text message, so I can't say this is exactly what Mrs. Lively said.
Q So do you recall Ms. Lively saying that Mr. Heath was looking in her direction the entire conversation when she turned around?
A No. I remember Ms. Lively saying that when she turned around, she had noticed that Mr. Heath was looking in her direction.
Q And do you recall Ms. Lively saying that

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that made her feel uncomfortable?
A No.
Q Do you recall Ms. Lively saying this in a way that she seemed happy about it?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q She seemed unhappy about it?
A I think -- no, I don't think it was a -- she wasn't upset. She didn't seem upset.
Q Do -- is it your testimony that you believe Ms. Lively to be saying she didn't care one way or the other that Mr. Heath was looking at her in the trailer that day?
MS. SHAPIRO: Objection.
THE WITNESS: That's not what I said.
BY MR. GOTTLIEB:
Q I'm trying to understand what you recollect, and if you recollect that Ms. Lively relayed this story because she was troubled, bothered, concerned, whatever word you would like to use about it, or if you're saying something different.
MS. SHAPIRO: Objection.
THE WITNESS: Well, you had asked me if I

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thought Ms. Lively was upset, and that's why she was sharing the story. I can't, one, speculate to what Ms. Lively was feeling. All I was saying was that she did not seem upset as she was sharing the story. It felt like this was something that she wanted to share to ensure it didn't happen again. But I can't speculate as to what she was feeling or not feeling.
BY MR. GOTTLIEB:
Q She didn't want it to happen again; you understood that?
A Yes.
Q Okay.
Did anyone talk to HR about that incident, the incident in the trailer?
A To my knowledge, no.
Q Do you know one way or another whether Ms. Lively started locking her trailer door after that event?
A I do not.
Q Did Sony ever issue any kind of warning to you or to Mr. Heath so far as you know?
A A warning?
Q A warning.
A No, not that I'm aware of.
Q A caution?

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A You're welcome to refresh my memory, but not that I can think of.
Q That's fine. I'm just interested if you recall any time that they cautioned, warned, or otherwise issued any -- anything that sounded like that to you?
A I don't recall a warning or a caution.
MR. GOTTLIEB: Let's do Exhibit 31.
(Exhibit 31 marked for identification.)
BY MR. GOTTLIEB:
Q Mr. Baldoni, you've been handed what's been marked as Exhibit 31, which is a document bearing the Bates Nos. BALDONI 16447 through 16452, and this is a text chain, I believe, between yourself, Mr. Heath, Ms. Abel, and Stephanie Jones on November 10th, 2023.
Let me know once you've had a chance to look at it.
A Okay.
Q Had a chance to review Exhibit 31, Mr. Baldoni?
A I have.
Q Do you recognize this document?
A I do.
Q You've seen this before?

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A I have.
Q You've seen both the text and the attachment before?
A Yes.
Q This text chain -- Henny Grace is your alias; is that right?
A Was, yes.
Q Was your alias. And -- and you are communicating through that with Mr. Heath, Ms. Abel, and Stephanie Jones; is that right?
A Yes. That's just the name on my -- the way that my phone is set up.
Q Okay.
A That's not like I show up as Henny Grace to be anybody else.
Q And the date is November 10, 2023?
A It appears so.
Q And you're asking Ms. Abel and Ms. Jones for a Zoom, correct?
A Yes.
Q Why were you asking your publicist for a Zoom about the attached document?
A I wanted to share it with them.
Q At 10:11 p.m., Mr. Heath sends through what appears to be a screenshot of a message from someone named Lindsey to Imene and Joseph. Did I pronounce that first name right?

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A Close enough.
Q You tell me.
A Imene.
Q Imene. Imene and Joseph. And have you seen that text before?
A I believe this is a text that was an email, so yes.
Q So it's a text forwarding through a language from the email; is that right?
A Correct.
Q And this was the cover email that was sent to the Protections for Return to Production that are on the following pages?
A I believe so, yes.
Q And Lindsey Strasberg is an attorney who represented Ms. Lively; is that right?
A I believe so, yes.
Q And is this around the time that you first learned of the enclosed list of protections?
A I would imagine so.
Q Do you see how at the top of that message, Ms. Strasberg writes:
(As read):

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"It is no surprise to the film's producer that the experience of shooting the film has been deeply concerning on many levels"?
A I do see that, yes.
Q And by that point in time, you were aware of and familiar with a number of concerns that had been expressed by multiple people on the set of It Ends with Us; is that correct?
MS. SHAPIRO: Objection.
THE WITNESS: No. We were very surprised by that language.
BY MR. GOTTLIEB:
Q Okay. You see the next sentence after that:
(As read):
"The complaints of our client and others have been repeatedly conveyed and well-documented throughout pre-production and photography."
Do you see that?
A I do see that.
Q Is it your testimony that you were surprised by that language as well?
MS. SHAPIRO: Objection.

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THE WITNESS: I was surprised by all of this, yes.
BY MR. GOTTLIEB:
Q The next sentence says:
(As read):
"While we reserve all legal rights, at this stage our client is willing to forego a more formal HR process in favor of everyone returning to work and finishing the film as long as the set is safe moving forward."
Do you see that?
A I do.
Q You understood that the objective of this list was to allow the production of the film to continue as long as safe -- as long as the set is safe moving forward?
A Yes.
Q And then, the next sentence says:
(As read):
"In order for our client to feel safe returning to the production, we are attaching a list of protections that will need to be guaranteed and observed by the film's producers."

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Do you see that?
A Yes.
Q And you understood that reference to be a list -- the reference to the list to be the 17 points that are on the attached page?
A After I read this, I learned that to be the case, yes.
Q Okay. And you also understood -- well, let me ask it this way.
Did you think at this point in time that legal action might be possible with respect to what Ms. Lively was asserting here?
MS. SHAPIRO: Objection.
THE WITNESS: I had no idea what Ms. Lively was asserting here.
BY MR. GOTTLIEB:
Q Did you read the 17 points?
A I did.
Q Do you recall reading them promptly when you received this?
A I do.
Q Do you recall reading them more than once?
A That, I don't recall, but...
Q Do you see references in the 17-point

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list to an intimacy coordinator being present at all times?
Do you see a reference in No. 1 --
A Yes.
Q -- for an intimacy coordinator being present at all times?
A Yes.
Q And you knew that Ms. Lively had concerns about some of the intimate scenes in the movie, correct?
MS. SHAPIRO: Objection.
THE WITNESS: This was just -- it was -- I mean, it's an easy yes. A lot of these things are just things that are no issues.
BY MR. GOTTLIEB:
Q What do you mean by that?
A She wants an intimacy coordinator present at all times when she's on set, that's fine.
Q It's a reasonable ask?
A Sure.
Q That's not something that is fabricated?
MS. SHAPIRO: Objection.
THE WITNESS: What do you mean?
BY MR. GOTTLIEB:
Q That's not a demand based on some

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fabricated event?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know what the event is. There's no talking about an event here. It's just a ask for an intimacy coordinator present at all times. We already had an intimacy coordinator, so...
BY MR. GOTTLIEB:
Q Do you see a reference to No. 3:
(As read):
"There is to be no spontaneous improvising of any scenes involving physical touching, simulated sex, or nudity"?
A Yes.
Q Was that also a reasonable ask?
A I have no idea what that was about, and that is a reasonable ask.
Q Did you later come to learn what that was about?
MS. SHAPIRO: Objection.
THE WITNESS: I later learned that Ms. Lively had said that there was improvising of a -- of a dance scene, but I had no understanding of that receiving this document.

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BY MR. GOTTLIEB:
Q Later, you understood because you sent a video out to the public about that dance scene, right?
MS. SHAPIRO: Objection.
THE WITNESS: I didn't personally send a video out.
BY MR. GOTTLIEB:
Q You had it sent out?
MS. SHAPIRO: Objection.
THE WITNESS: I didn't have it sent out, but I agreed for it to go out, yes.
BY MR. GOTTLIEB:
Q And that video of that scene involved improvi- -- improvisation of intimacy; is that correct?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe so.
BY MR. GOTTLIEB:
Q Is it your testimony that everything that occurred during that scene was written into the script?
MS. SHAPIRO: Objection.
THE WITNESS: No. It's my testimony that I wouldn't qualify that as intimacy.

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BY MR. GOTTLIEB:
Q Nothing in the video of the dance scene from the bar is something you would describe as intimacy?
A I am not a representative of SAG, nor am I an intimacy coordinator, but I don't believe that intimacy coordinator would describe the actions in that video as an intimate scene.
Q Did it involve physical touching?
A Dancing, so yes, we were already -- the two characters were already touching in that scene.
Q Did it involve kissing?
A To my understanding, there was no kissing in that scene.
Q But there was kissing in the video, correct?
A No.
Q Did you attempt to kiss Ms. Lively?
A No.
Q In the filming of that scene?
A No.
Q Okay.
You see in No. 6 it says:
(As read):
"No one will enter, attempt to enter, interrupt, pressure, request to entrance to BL's trailer while she is in a state of undress for any reason"?

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A I see that, yes.
Q You understood what that referred to; did you not?
A I made an assumption at the time, but again, very surprising considering everything after that conversation was fine.
Q You mentioned before a discussion about Ms. Lively getting COVID, right?
A Yes.
Q You see a reference to No. 9, Ms. Lively being exposed to COVID?
A Yes.
Q So that one is not made up either, right?
MS. SHAPIRO: Objection.
THE WITNESS: To my knowledge, Ms. Lively had COVID-19. She said she did.
BY MR. GOTTLIEB:
Q Do you see the paragraph 10, saying:
(As read):
"There shall be no retaliation of any kind against Ms. -- against BL for raising concerns about the conduct

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described in this letter or for these requirements. Any changes in attitude, sarcasm, marginalization, or other negative behavior, either on set or otherwise, including during publicity and promotional work, as a result of these requests, is retaliatory and unacceptable, and will be met with immediate action."
Do you see that?
A I do.
Q And you ultimately agreed to that; did you not?
MS. SHAPIRO: Objection.
THE WITNESS: I still do.
BY MR. GOTTLIEB:
Q And Wayfarer Studios agreed to that as well, right?
A I believe Wayfarer Studios is who agreed to this, yes.
Q Do you see the reference in paragraph 17 to the holding of an:
(As read):
"All-hands, in-person meeting before production resumes"?

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A Yes.
Q Do you see that that meeting was supposed to include:
(As read):
"The director, all producers, the Sony representative, the newly-engaged third-party producer, BL and BL's designated representatives to confirm and approve a plan for the implementation of the above that will be adhered to for the physical and emotional safety of BL, her employees, and all the cast and crew moving forward"?
A I do.
Q Did that meeting occur?
A I believe that meeting did occur.
Q When did that meeting occur?
A The evening before day one of production. I don't have the exact date offhand.
Q January 4th, 2024?
A That sounds -- that sounds correct.
Q And where was that meeting held?
A Ms. Lively and Mr. Reynolds' residence.
Q And did all those people that you see

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listed there in paragraph 17 attend to the best of your knowledge?
A They did, but I don't believe anyone knew what -- that that was the meeting --
Q Okay.
A -- that they were attending.
MR. GOTTLIEB: Exhibit 32.
THE WITNESS: I may after like the next round need to --
MS. SHAPIRO: Do you want to take a break now to go to the bathroom?
MR. GOTTLIEB: If you want to take a break now for the restroom, we can.
THE WITNESS: Can we take a quick break?
MS. SHAPIRO: Ten minutes.
THE WITNESS: I don't need that much time.
MS. SHAPIRO: Five minutes.
MR. GOTTLIEB: It's hard to take a very short break just because people have to --
THE WITNESS: Okay.
MR. GOTTLIEB: Let's go off the record, please.
THE VIDEOGRAPHER: We are going off the record. The time is 4:06 p.m.

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(Recess.)
THE VIDEOGRAPHER: We're back on the record. The time is 4:20 p.m.
BY MR. GOTTLIEB:
Q Mr. Baldoni, before the break, I had handed you Exhibit 32. I'm going to ask you about your message that appears on the first page, first full page of Exhibit 32. Exhibit 32 is a text chain between yourself and a number of individuals on November 12th, 2023; is that right?
(Exhibit 32 marked for identification.)
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q And how would you describe -- it looks like there's a title to this group. It says: "Prayers and support."
What is that?
A This is just a group of some of my best male friends.
Q And Mr. Heath is on there. He's a friend and also a co-worker, right?
A Yes.
Q And what about Mr. Musiol?
A My best friend and not technically a co-worker. Former partner.

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Q Former partner from Wayfarer Entertainment?
A Yes.
Q But not with Wayfarer Studios?
A Not in an official capacity.
Q Okay. Anybody else in this chain that was with or an employee of Wayfarer Studios?
A No.
Q Okay.
So then, looking at your message, you have a message that carries over from BALDONI 26194 to 26195. And that's a message that you send to this group, it looks like 11:49 a.m. on November 12th, 2023; is that right?
A Yes.
Q And this is a day or two after you received the 17-point return to production?
A I -- I -- I haven't seen this, so I would love to read it.
Q Okay. Please do. I am not going to ask you anything about it past your message.
A Okay. I read it.
Q You knew that the returns for -- the protections for the return to production document with the 17 conditions, insinuated that you were

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unsafe/sexually harassing?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know what I knew at the time, but I clearly said that. I think I didn't know what she was actually insinuating, but I was clearly scared and filled with anxiety.
BY MR. GOTTLIEB:
Q Okay. But the words you used were:
(As read):
"I am unsafe/sexually harassing, et cetera, et cetera, et cetera," right?
MS. SHAPIRO: Objection.
THE WITNESS: We all know what this document insinuates.
BY MR. GOTTLIEB:
Q Do you recall earlier in your testimony, I was asking you questions about whether you have ever understood that it was insinuated that you had sexually harassed anyone?
A I do remember that part of the conversation.
Q And you answered that question with a no, right?
MS. SHAPIRO: Objection.
THE WITNESS: Not sure what I answered.

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BY MR. GOTTLIEB:
Q Okay. Here you are saying:
(As read):
"We all know what this document insinuates," right?
A I see that.
Q You say:
(As read):
"This is all a manipulation," right?
A I see that I said that too.
Q You say:
(As read):
"There's even silly things, inferring Jamey was inappropriate, which is silly," right?
A I read that, yes.
Q Is the reference to Mr. Heath that's in the 17-point list a reference to entering trailers?
MS. SHAPIRO: Objection.
THE WITNESS: I have no idea what I was referring to here.
BY MR. GOTTLIEB:
Q Okay. But what you knew was you thought that there was something inferring that Mr. Heath had been inappropriate, which you thought was silly?

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MS. SHAPIRO: Objection.
THE WITNESS: I don't know what I was saying was silly. That's what I can tell you.
BY MR. GOTTLIEB:
Q You said that:
(As read):
"This letter was sent in an effort to gain power over you personally and the studio," right?
A I think that's what I believed.
Q That's what you believed at the time?
A Very clearly, yes.
Q Yet, you thought all or nearly all of the requests or the conditions in the letter were reasonable, right?
MS. SHAPIRO: Objection.
THE WITNESS: I did.
BY MR. GOTTLIEB:
Q So what kind of a plan is that?
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q If you're trying to come up with a plan to assert power and domination over somebody, why would you send them a list of 17 very reasonable things to do?

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MS. SHAPIRO: Objection.
THE WITNESS: I can't speculate as to why someone would do that.
BY MR. GOTTLIEB:
Q In the list of 17 conditions or the text that was accompanying it that was screenshot in the document we just looked at, was there any demand to send Ms. Lively the unfinished director's cut of the movie?
A In what -- in what we read together?
Q In what we read together.
A No.
Q Was there any demand that Ms. Lively be allowed to take control of the edit of the film?
A In the 17-point list?
Q In the 17-point list.
A No.
Q Was there any demand about ultimate control over the content of the film?
MS. SHAPIRO: Objection.
THE WITNESS: I believe there was in the 17-point list.
BY MR. GOTTLIEB:
Q And what is your recollection of that?
A I believe there was a paragraph that --

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where she asked for ultimate control over some of the content of the film, just like what you said.
Q What content was that?
A I believe any intimate scene depicting her character.
Q Over intimate scenes, correct?
A Yes, but --
Q Okay.
A -- I consider that content.
Q You say to your friend group:
(As read):
"We don't believe she will leave or leak to press, but this is her threat of a nuclear bomb, as she knows this is the only way to get to me."
Do you see that?
A I do.
Q What did you mean, "this is the only way to get to me"?
A I'm not sure what I meant.
Q Do you believe that as you sit here today, that the 17-point list was a nuclear bomb and the only way to get to you?
A Again, I -- I don't know what I meant. This was a text sent in a very confusing, dark

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period, where I had no idea what was happening, and I was filled with anxiety.
Q Did you consider the 17-point list and the letter attached to it to be something that was pretty sensitive?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure I know what you mean.
BY MR. GOTTLIEB:
Q Was it the kind of document that at the time you would have wanted to get out in public?
THE WITNESS: I can't imagine I would want that.
BY MR. GOTTLIEB:
Q You would have wanted it to be confidential, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q It involved a series of conditions relating to It Ends with Us and the production of It Ends with Us that involved rather sensitive matters, right?
MS. SHAPIRO: Objection.
THE WITNESS: It was a legal document

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that came to our attorneys, so yes.
BY MR. GOTTLIEB:
Q And it involved issues relating to personnel and employment with respect to the film, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q So why did you feel like it was appropriate to send details about that to a friend group that included lots of people that didn't work at Wayfarer Studios?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe I sent the document itself or any attachments.
BY MR. GOTTLIEB:
Q You just described it?
MS. SHAPIRO: Objection.
THE WITNESS: I wasn't aware that there was anything in that document saying that I couldn't describe it.
BY MR. GOTTLIEB:
Q Before when I was asking you about the incident in Ms. Lively's trailer involving Mr. Heath, did you ever take any steps to confirm or

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learn what had actually happened in that meeting?
MS. SHAPIRO: Objection.
THE WITNESS: My understanding is anything that happened during that meeting interaction was discussed in person and worked out, and my recollection is Mr. Heath apologized to her for even looking in her direction. That's what he was apologizing for, and it never happened again.
BY MR. GOTTLIEB:
Q Did you ever take any steps to decide for yourself what you thought had happened?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure what further steps I could have taken, as Ms. Lively herself spoke to Jamey, and she was -- and they were the two people involved.
BY MR. GOTTLIEB:
Q You later came to learn that Mr. Heath had a different view of what happened in the trailer with Ms. Lively, right?
A Slightly different at the time.
Q And so did you take any steps to try to ascertain whose version of events was correct or accurate?
A No. Because at the time, the stories

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seemed to be pretty similar and there was no -- there was no reason to. It was worked out.
Q. Eventually, you believed Mr. Heath's version of what happened in the trailer?
MS. SHAPIRO: Objection.
THE WITNESS: Again, at that time, which was 2023, the versions were very close. They seemed to be very different now.
BY MR. GOTTLIEB:
Q. Earlier, we talked a little bit about the January 4th meeting in Ms. Lively's apartment. Do you recall that?
A. Yes.
Q. You said -- well, withdrawn. You attended that meeting?
A. I did.
Q. It was memorable?
MS. SHAPIRO: Objection.
THE WITNESS: That's one way to put it.
BY MR. GOTTLIEB:
Q. Would you characterize it as traumatic?
A. I, for me, would. I'm not sure if anyone else would.
Q. I'm only asking about you, sir.
MS. SHAPIRO: Objection.

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THE WITNESS: Yeah.
BY MR. GOTTLIEB:
Q. During that meeting, did Ms. Lively read a list from her phone?
A. She did.
Q. Do you have a distinct memory of her reading a list of incidents or items from her phone to the group during that meeting?
A. I do.
Q. Okay.
MR. GOTTLIEB: I'm going to mark the next exhibit, Exhibit 33. Mr. Baldoni, you've been handed what's been marked as Exhibit 33. This is a document bearing the Bates Nos. BL 38461 through BL 38462.
(Exhibit 33 marked for identification.)
BY MR. GOTTLIEB:
Q. Have you had a chance to review this exhibit, Exhibit 33?
A. I have.
Q. Do you know one way or the other as you sit here today, whether this is the list that Ms. Lively read from her phone during that meeting on January 4th?
A. This was not the list that Ms. Lively

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read from her phone.
Q. How do you know that this is not the list that Ms. Lively read from, from her phone, in that meeting on January 4th, 2024?
A. For one, she never used the wording "no more." So that's how I know, first off.
Q. Okay. And you know that based on your specific recollection of how she spoke to you during that meeting?
A. I know that because I was present and in shock of what I was hearing, and paid very close attention to the words, and "no more" was never used. It also says an updated list, so I'm not sure when it was updated.
Q. Okay. Well, apart from your identification of "no more," do you have any other reason to believe that this list is not what Ms. Lively read from during the meeting on January 4th, 2024?
MS. SHAPIRO: Objection.
THE WITNESS: I think that's a big one. I mean, the fact that she never said "no more" shows it's not the same list.
BY MR. GOTTLIEB:
Q. I'm asking if there's any other reason?

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A. Yes, there are certain -- I would say there's quite a few things in here that were not read or discussed that day.
Q. Do you recall Ms. Lively saying during the meeting that this was the worst experience of her life?
A. I do.
Q. Do you recall her saying during the meeting that others had witnessed this behavior?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember those exact words, no.
BY MR. GOTTLIEB:
Q. Do you recall the words "creepy" or "abuse" being used in reference to your behavior?
A. I definitely don't remember the word "abuse." I think I remember the word "creepy."
Q. Do you recall feeling embarrassed while Ms. Lively was reading out these items?
A. I think that could be accurate for one of the things I was feeling, yeah.
Q. I want to mark another exhibit. Before I go on, Mr. Baldoni, I can't remember if Ange Giannetti is one of the people whose depositions you listened to.

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Did you listen to that one?
A I listened to part of it, yes.
Q Did you listen to the part where she testified about the January 4th meeting?
A I'm unsure.
Q Do you know one way or another, whether Ange Giannetti testified about whether this list, Exhibit 33, is what she remembered Ms. Lively sharing during that meeting?
A I don't know.
Q Would you be surprised to learn that Ms. Giannetti testified this is the list she remembers Ms. Lively sharing?
MS. SHAPIRO: Objection.
THE WITNESS: I wouldn't be surprised.
MR. GOTTLIEB: Okay. Exhibit 34. Mr. Baldoni, you've been handed what's been marked as Exhibit 34, which is another text chain in the "Prayers and support" text there we talked about, I think in Exhibit 32. This is a document bearing the Bates Nos. BALDONI 26204 through 26206.
Go ahead and read it.
(Exhibit 34 marked for identification.)
THE WITNESS: Okay.

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BY MR. GOTTLIEB:
Q This is a text chain on January 5th, 2024 with the "Prayers and support" group that you testified about previously?
A It appears to be so.
Q And is that a -- is that a WhatsApp group or is that a group just on your phone?
A I don't think it was WhatsApp. I think it was just a message.
Q And this is the day after the January 4th meeting, right?
A It appears to be January 5th, correct.
Q Mr. Wilson is asking for an update at 6:20 p.m.?
A Yes.
Q And you respond?
A I certainly do.
Q And in your response, you acknowledge that Ms. Lively conveyed that you had made her feel unsafe; is that right?
A Essentially, that's what she said, yes.
Q You say:
(As read):
"My brain was trying to defend itself when they were needing me to apologize

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for all the ways I have fucked up and made her feel unsafe." Right?
A That's what I wrote, yes.
Q And you disagreed with Ms. Lively, I imagine?
A Very strongly.
Q But you understood very well her to be saying that you had made her feel unsafe, right?
A I understood that that's what she was insinuating by reading from this list.
Q Okay. And you say here, you were:
(As read):
"Read from a phone all the things that I did. While many of them were based in actual situations, the events were wrong and things were taken completely out of context."
Do you see that?
A I do.
Q And so were you saying here that the list includes a number of things and situations that occurred, but you disagree with the way that they were being framed and the context they were being placed in?
MS. SHAPIRO: Objection.

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THE WITNESS: Yes, completely.
BY MR. GOTTLIEB:
Q You see here "the word creepy and abused were used in reference to me and my behavior"?
A I do see that, yes.
Q And you see a little bit later, you say that you were:
(As read):
"Unable to respond. Mr. Heath did a beautiful job apologizing. You were embarrassed that you were unable to formulate the correct words to apologize and honestly feel like a bad person."
Do you see that?
A I would beat myself up a lot, clearly.
Q You said:
(As read):
"It's hard to feel so much of what they believe about me is false because they are so convinced that it's real."
Do you see that?
A I do.
Q Did it occur to you that they might be right?

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MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q Did it occur to you that maybe some of the ways you had perceived how your actions had affected Ms. Lively were inconsistent with how Ms. Lively perceived your actions?
MS. SHAPIRO: Objection.
THE WITNESS: Can you ask that one more time?
BY MR. GOTTLIEB:
Q Did it occur to you that maybe you and Ms. Lively did not share the same feelings about events that you both recognized occurred?
MS. SHAPIRO: Objection.
THE WITNESS: I think it was very clear we didn't share the same feelings. My issue was with the actual events themselves.
BY MR. GOTTLIEB:
Q Did it occur to you that certain events that you knew had occurred, might have had a different kind of an effect on Ms. Lively than they had on you?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure.

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BY MR. GOTTLIEB:
Q You were told that this was the worst experience of Ms. Lively's life?
A I believe I wrote that down, so...
Q Did that give you -- did that give you pause, Mr. Baldoni?
MS. SHAPIRO: Objection.
THE WITNESS: In what way?
BY MR. GOTTLIEB:
Q In a way that you were making a movie about an important subject, it was important to you, consistent with the mission of your studio. You wanted to empower women and tell a story through a female gaze, and you had your lead actor, co-star, saying it was the worst experience of her life?
MS. SHAPIRO: Objection.
THE WITNESS: I found it very confusing.
MR. GOTTLIEB: This is 35.
(Exhibit 35 marked for identification.)
THE WITNESS: Thanks.
BY MR. GOTTLIEB:
Q Mr. Baldoni, you've been handed what's been marked as Exhibit 35. It's a document bearing the Bates Nos. BALDONI 18852 through 18856.
A Uh-huh.

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Q And I apologize if I've asked this before, but who is Travis Van Winkle?
A It's one of my best friends.
Q Okay. Not a Wayfarer employee?
A Not a Wayfarer employee.
Q And this is a text chain between you and Mr. Van Winkle on February 23rd, 2024; is that right?
A Yes.
Q All right. Take a minute, read through it, and I will ask you some questions.
You've had a chance to read Exhibit 35?
A I have.
Q This is your text exchange with Mr. Van Winkle?
A It is.
Q At 11:15 a.m., which is on the bottom of page 18854, in reference to Sony you say:
(As read):
"They just want the movie to do well and they can't release a movie the star doesn't promote."
Do you see that?
A Yes.
Q You believe that was true, right?

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A At one point, Josh had said they would release it even if she doesn't. But my saying, "they can't," I mean, I'm just mincing words, but overall, they did not want to or suggest releasing a movie that a star wouldn't promote.
Q Sort of common knowledge the studio doesn't want to release a film that the lead didn't want to engage in the promotion of?
A Yes.
Q Not a super controversial proposition, right?
A I don't think that would be.
Q All right. That was true from day one, right?
A What was?
Q That if Ms. Lively didn't want to promote the movie, it was going to be difficult to release it?
A I'm sure that was one of the reasons that Sony suggested her.
Q And it was one of the reasons you wanted her on the film, right, because if Ms. Lively promoted the movie, the movie would be more successful?
MS. SHAPIRO: Objection.

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THE WITNESS: I'm sure that was one of the reasons.
BY MR. GOTTLIEB:
Q Because she's a star?
A Yeah.
Q In fact, you recall having a conversation with Mr. Heath at the time you were trying to bring Ms. Lively on in December of 2022, where you and Mr. Heath say, "Everybody loves Blake Lively"?
A I don't remember that conversation, but I'm sure you have it.
Q Would it surprise you if you had that conversation with Mr. Heath?
MS. SHAPIRO: Objection.
THE WITNESS: I -- I don't think it would.
BY MR. GOTTLIEB:
Q You thought in December of 2022, Ms. Lively had a sterling reputation; is that right?
A I believe I did.
Q And that she was well liked by fans? Yes?
A Yes, I believe I did.
Q And the kind of person who could help drive box office success, right?

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A Yes. Along with her husband and her best friend.
Q And the kind of person who could help get the message, the important message, of your movie out, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes. I hoped that that would be a big part of it.
BY MR. GOTTLIEB:
Q So would you have disagreed in December of 2022 if somebody had said to you, Ms. Lively has got a terrible well-known reputation in the industry; nobody likes her?
MS. SHAPIRO: Objection.
THE WITNESS: Nobody told me that.
BY MR. GOTTLIEB:
Q If Katie Case or Breanna Koslow had told you that in December of 2022, would you have found that very surprising?
MS. SHAPIRO: Objection.
THE WITNESS: I don't think I can speculate on that.
BY MR. GOTTLIEB:
Q Okay. On the previous page 18853, at 11:01 a.m., you say of Ms. Lively:

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(As read):
"She had the nuclear bomb. If she doesn't promote the movie, she can leak that I'm a bad person or that she felt unsafe with me and all the stuff she has on me. Then she's the victim. It's the Taylor Swift playbook. So she can ask for whatever she wants because she knows I know."
Do you see that?
A I do.
Q Did you mean that?
MS. SHAPIRO: Objection.
THE WITNESS: What part of it?
BY MR. GOTTLIEB:
Q All of it.
A I don't know.
Q You had agreed to the conditions that Ms. Lively asked for to return to set, right?
A Yes.
Q And upon the return to production, so far as production on the set went, things went pretty well, right?
A According to your own complaint, it went -- everything went great.

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Q Any other incidents that you can think of after January 4, 2024?
A No.
Q So what is all this stuff that Ms. Lively had on you that constituted the nuclear bomb?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know.
BY MR. GOTTLIEB:
Q Would it be the items in the list that Ms. Lively read from in the meeting on January 4th you're referring to here?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sure that was a part of it.
BY MR. GOTTLIEB:
Q Is that what -- sorry, go ahead.
A No, please.
Q Is that what you were afraid that Ms. Lively might leak?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure what she was going to do. I can't -- I was very in the dark.
BY MR. GOTTLIEB:
Q What else would you have been thinking of when you are referring to a nuclear bomb, and you

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refer to her -- Ms. Lively leaking, "I'm a bad person or that she felt unsafe with me"?
MS. SHAPIRO: Objection.
THE WITNESS: I think when you are somebody small in the industry like myself, and you're dealing with a titan like Ms. Lively and some of the most powerful people in the world, which are her best friends, and you're in the situation that I was in, I think it's very reasonable, especially at this point, to be concerned about what's possible and what's not. I -- I was spinning at this point.
BY MR. GOTTLIEB:
Q Is there anything else you can think of other than the material contained within the 17-point list or the list that Ms. Lively read from on January 4th, 2024, that as you sit here today, you might have been referring to when you referred to a nuclear bomb that could be leaked?
MS. SHAPIRO: Objection.
THE WITNESS: Nothing about the 17-point list. But I assure you that that list that was read to me contained complete fabrications of the truth. So I very well could have -- could have had that be a part of what I felt scared of, lies. But I didn't know. I didn't know anything. I knew that at this

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point, my gut feeling was that she was going to take over the film.
BY MR. GOTTLIEB:
Q Lies. When you say "lies," you mean, lies insinuating that you had made Ms. Lively feel unsafe?
A No. That's not what I mean.
Q Lies insinuating that you had sexually harassed Ms. Lively?
MS. SHAPIRO: Objection.
THE WITNESS: No. I'm speaking about lies in general.
BY MR. GOTTLIEB:
Q You're the co-head of Wayfarer Studios; are you not?
A I am the co-chairman.
Q The co-chairman of Wayfarer Studios. But the executives answer to you and Mr. Sarowitz?
MS. SHAPIRO: Objection. Objection.
THE WITNESS: The executives answer to our CEO, and our CEO reports to me and Sarowitz.
BY MR. GOTTLIEB:
Q And you testified earlier that you could fire the CEO if you wanted to?
A I imagine I could do -- yeah, I imagine I

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could.
Q And it's Mr. Sarowitz's money that financed this particular project; is that right?
A Co-financed.
Q Co-financed?
A Yes.
Q If you had wanted to, you could have just decided not to go forward with the movie, right?
MS. SHAPIRO: Objection.
THE WITNESS: At what point?
BY MR. GOTTLIEB:
Q At any point.
A Not necessarily.
Q As of February 23, 2024, could you have pulled the plug on the movie?
A I don't believe so.
Q Even -- you don't believe you could have done so without inviting litigation; is that what you're saying?
MS. SHAPIRO: Objection.
THE WITNESS: I believe this was the biggest project that we'd ever invested in, ever had, and we had a tremendous amount of money invested in it, and so did Sony who were our partners, so we had an obligation, a fiduciary

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obligation to Sony, and to Steve's family to not pull out of the film.
BY MR. GOTTLIEB:
Q To not lose that money?
MS. SHAPIRO: Objection.
THE WITNESS: It wasn't just about money. It was one of the major factors, yes.
BY MR. GOTTLIEB:
Q Okay. But nonetheless, you're the co-founder of the studio, right?
A Yes.
Q You're the director of the film, right?
A Yes.
Q You are the co-lead actor, right?
A Yes.
Q You are an executive producer, right?
A At that time, I was.
Q That is a lot of accumulated power on one movie; is it not?
MS. SHAPIRO: Objection.
THE WITNESS: It is, and also I don't think it's unusual.
BY MR. GOTTLIEB:
Q Is that the typical arrangement that you're familiar with?

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A I wouldn't say it's a typical way.
MS. SHAPIRO: Objection.
BY MR. GOTTLIEB:
Q It's not typical. It's also not unheard of; is that what you're saying?
MS. SHAPIRO: Objection.
THE WITNESS: Yeah.
BY MR. GOTTLIEB:
Q And you knew that that accumulation of positions gave you a lot of power over the movie, didn't you?
MS. SHAPIRO: Objection.
THE WITNESS: I don't believe I thought of it that way.
BY MR. GOTTLIEB:
Q Did it make you mad that Ms. Lively had power in the context of the production of the film?
MS. SHAPIRO: Objection.
THE WITNESS: Did it make me mad that Ms. Lively had power, no.
BY MR. GOTTLIEB:
Q Do you recall ever having a conversation with any representatives of WME before Ms. Lively was signed onto the film about the conditions and the demands that she was making in advance for

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coming onto the film?
MS. SHAPIRO: Objection.
THE WITNESS: I don't recall a specific conversation.
BY MR. GOTTLIEB:
Q Do you recall ever drafting content that you wanted to communicate to WME that you share with Mr. Heath in December of 2022?
A I don't, but I'd be happy to see it.
Q Do you recall ever saying, "I discovered this book"?
A I don't recall.
Q "I control this film"?
MS. SHAPIRO: Objection.
THE WITNESS: I don't recall.
BY MR. GOTTLIEB:
Q Did you discover the book?
MS. SHAPIRO: Objection.
THE WITNESS: Did I discover the book? The book was given to me by my book agent.
BY MR. GOTTLIEB:
Q Did you turn It Ends with Us into a success as a book?
A No, not me singularly.
Q Did you play a substantial role in it

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becoming a success as a book?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sorry. I was -- I thought you said movie. The book, I played no role in it becoming a successful book.
BY MR. GOTTLIEB:
Q Okay. That was Colleen Hoover, right?
A Completely.
MR. GOTTLIEB: Mr. Baldoni, you've been handed what's been marked as Exhibit 36. Exhibit 36 is document bearing the Bates Nos. BALDONI 33560 through 33566. And this is a text chain between you and Mr. Heath on April 27th, 2024.
(Exhibit 36 marked for identification.)
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q You're having a discussion here with Mr. Heath about the trailer?
A If it's okay, I'd love to read it. I haven't seen it.
Q Oh, sure. Sorry.
A Okay.
Q I understand this is a very personal exchange you had with your friend, Mr. Heath?
A It is.

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Q And a moment of vulnerability and candor, right?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q You're talking in this exchange with Mr. Heath about frustrations that have been building for you and culminating in the construction of the trailer; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: I believe so, yes.
BY MR. GOTTLIEB:
Q And you say a series of things to Mr. Heath, and that causes Mr. Heath to get a little bit upset?
A That's a pattern that we have together. We tell each other the truth, and we get shit out. And then we -- and then we come back to each other.
Q And then Mr. Heath --
A He's always a voice of reason for me.
Q Sorry.
Mr. Heath, I think, wisely advises that you both sleep it off and come back tomorrow, right?
A He's a wise man.
Q And when you do come back, you apologize

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to Mr. Heath for what you were saying the night before, right? At 2:23 p.m. on the 27th, on page 33565?
A Yeah. I believe we could sum it up that way.
Q And what you say is, you've just come out of therapy, and you're purging shit out and exhausted. And then you say:
(As read):
"So much fear of Blake coming out and going public about how I'm a bad person and unsafe and not who I say I am."
Do you see that?
A I do.
Q And that's similar language to the fear that you describe to Mr. Van Winkle in the document we just looked at a few minutes ago from February, right?
MS. SHAPIRO: Objection.
THE WITNESS: I believe so.
BY MR. GOTTLIEB:
Q You were very concerned that Ms. Lively would go public with some of the materials or allegations that had been contained in the 17-point list and in the list you read on January 4th,

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right?
MS. SHAPIRO: Objection.
THE WITNESS: Again, I disagree with anything to do with the 17-point list.
BY MR. GOTTLIEB:
Q But you think it might have referred to items that were in the January 4th list?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sure I had feelings about the lies that I felt were in the January 4th meeting, but I think it's a very reasonable feeling that I'm expressing here.
BY MR. GOTTLIEB:
Q Mr. Baldoni, was the thought of someone saying publicly that you were not who you say you are, one of your biggest fears?
A I think based on where I was emotionally in my healing journey therapy at the time in going through this film, I would imagine that was a fear, yes.
Q And that's what you're referencing here to Mr. Heath, isn't it, with your reference to the little boy that you're so intertwined with?
MS. SHAPIRO: Objection.
THE WITNESS: I'm just out of therapy and

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clearly not very sober in terms of my emotional state. So I was extremely sensitive and vulnerable and clearly in a very dark place at that moment.
BY MR. GOTTLIEB:
Q I understand, and I'm sorry to press on it, but you're saying to Mr. Heath, I think, particularly in this carryover message at 2:33 p.m. on 27th, that your personality is being overrun by this little boy who feels scared and threatened; is that what you're conveying to Mr. Heath in this message?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q That's not what you meant by:
(As read):
"He's been running the show when he feels scared and threatened and that's who you get so frustrated with"?
MS. SHAPIRO: Objection.
THE WITNESS: What I meant by that is, in moments of intense emotion, in moments where I'm short or can get angry very quickly, in those moments, I believe that is the little boy in me that doesn't feel safe. And it's in those moments, like

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the moment I just read, watching the way that I was even texting him, almost with like a frantic energy, it's like a -- it feels like a little kid. And in those moments, it feels like that boy is in charge. It's -- it's not literal by any means.
BY MR. GOTTLIEB:
Q But that feeling, which I recognize is a figurative description of your internal process, is what you're describing to Mr. Heath occurred to you emotionally the night before, right?
MS. SHAPIRO: Objection.
THE WITNESS: I can't say exactly.
BY MR. GOTTLIEB:
Q And that feeling or the little boy or however we described it, was able to make you behave towards your best friend, and the CEO of Wayfarer Studios, in a way that you clearly regretted the next day, right?
MS. SHAPIRO: Objection.
THE WITNESS: I think this is a very normal conversation for best friends who have been friends for as long as Jamey and I have, to have a outlet or a safe place to be angry and then to come back. I think marriage is a place like that, and I think friendships like mine and Jamey's, which I to

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this day feel so lucky to have, where you're not judged for moments where you're oversensitive or emotional or you can say stuff you don't mean and come back later and not be judged. That's what I meant.

MR. GOTTLIEB: All right. Thank you, Mr. Baldoni. We're going to go off record.

THE VIDEOGRAPHER: We are going off the record. The time is 5:14 p.m.

(Recess.)

THE VIDEOGRAPHER: We're back on the record the time is 5:44 p.m.

MR. GOTTLIEB: Mr. Baldoni, you're being handed what's been marked as Exhibit 37.

(Exhibit 37 marked for identification.)

THE WITNESS: Thank you.

MR. GOTTLIEB: Exhibit 37 is an email you sent to Alex Saks, Ange Giannetti, Jamey Heath, Andrew Calof, and AJ Marbory on February 20th, 2023. It bears Bates No. SPE_BL 5563 through 5564.

THE WITNESS: I'm going to read it, if that's all right.

MR. GOTTLIEB: Yeah.

MS. AHOURAIAN: Steve?

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(Phone interruption.)

MR. SAROWITZ: Sorry about that.

MR. GOTTLIEB: Can we go off record, please?

THE VIDEOGRAPHER: We're going off the record. The time is 5:47 p.m.

(Recess.)

THE VIDEOGRAPHER: We're back on the record. The time is 5:47 p.m.

BY MR. GOTTLIEB:

Q Mr. Baldoni, we're looking at what's been marked as Exhibit 37, same as we were before the break. And this is a message that you sent to Alex Saks, Ange Giannetti, Mr. Heath, Mr. Calof, copy to AJ Marbory on February 20, 2023?

A Correct.

Q Who is AJ Marbory?

A I'm sorry. I'm still finishing reading.

Q Okay.

A Thank you.

Q You sent this email?

A I did.

Q It was an apology to the group?

A Yes.

Q And especially to Alex Saks?

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A Yes.

Q Who is AJ Marbory?

A My former assistant.

Q You talked about this apology in a talk you did with Jane Randolph from No More a month later, in March of 2023; is that right?

A I don't know.

Q You say here that:

(As read):

"Over the last few months, I haven't been the safest place for myself, and in that, energetically, I feel I've failed at being a safe place for others."

Do you see that?

A I do.

Q Did you think that you had failed at being a safe place for others in the last few months?

A I think I was being very hard on myself here.

Q Okay. Does that mean you were being dishonest?

MS. SHAPIRO: Objection.

THE WITNESS: No, no. But as I sit here

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today, and I read this, I feel I was disproportionately hard on myself.

BY MR. GOTTLIEB:

Q You talk about how in a meeting that you had recently with Ms. Saks and Ms. Giannetti and Mr. Calof, Mr. Heath, you had interrupted and mansplained something as it relates to abuse and data and statistics to Ms. Saks; is that right?

A That's correct.

Q And you promised that:

(As read):

"As we go forward, I will make sure that doesn't happen again to any of the women involved in this film"?

MS. SHAPIRO: Objection.

THE WITNESS: That is what I said.

BY MR. GOTTLIEB:

Q You said you would always listen?

A Yes.

Q Do you think pressure had been getting to you at this point the end of February 2023?

MS. SHAPIRO: Objection.

THE WITNESS: I don't know if I can answer it's been getting to me. I think I felt a lot of pressure.

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BY MR. GOTTLIEB:
Q And that pressure had caused you to act in a way where you failed it being a safe place for others?
A No.
Q Would you have said these things you said here to Ms. Saks if Ms. Saks had not been a woman?
MS. SHAPIRO: Objection.
THE WITNESS: I don't think I can answer that question.
BY MR. GOTTLIEB:
Q Did you watch or read Ms. Saks' deposition testimony?
A I did not read it. I watched some of it.
Q Did you watch the part where Ms. Saks testified about an incident on set in which she felt verbally abused by you?
A I don't remember hearing "verbally abused," no.
Q Do you recall Ms. Saks testifying about how you had yelled at her on the set at one point?
A I remember her testifying that, yes.
Q And she had felt frightened by that?
A I'm not sure if that was her testimony.
Q Do you recall Ms. Saks walking off of set

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after that incident occurred?
A I do not.
Q With respect to AJ Marbory, do you remember at any point in time asking -- is AJ Marbory a man or a woman?
A Woman.
Q Do you recall at any point in time having Ms. Marbory take a harassment prevention class on your behalf?
A No.
Q Do you recall at any point in time in April of 2023 that you were supposed to be taking a harassment prevention class?
A I don't.
Q Do you recall in exchange with Ms. Marbory on April 2, 2023 in which she said, "you're acing your harassment prevention class. Truly stellar job." And you responded "thank you, I'm working really hard at it"?
A I don't.
Q Okay. I want to ask you about the birth scene in It Ends with Us.
A Are we done with this?
Q Yes. Did you suggest that Ms. Lively perform the birth scene naked?

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A No.
Q Did Mr. Heath?
A No.
Q Did anyone else?
A I don't know.
Q Did you want Ms. Lively to perform the birth scene without most of her clothes on?
A No.
Q Did you ever tell Ms. Lively that your wife had ripped her clothes off during childbirth?
MS. SHAPIRO: Objection.
THE WITNESS: I do not recall a conversation where I said she ripped her clothes off during childbirth.
BY MR. GOTTLIEB:
Q Do you recall ever sharing any information with Ms. Lively in speaking about the birth scene in the movie, where you recounted information about your wife giving birth, to Ms. Lively?
MS. SHAPIRO: Objection.
THE WITNESS: I remember numerous conversations where Ms. Lively and I were talking about our -- and I don't mean my birth, but our, like, collective births, where she shared personal

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information and then I shared personal information about my wife.
BY MR. GOTTLIEB:
Q And as you sit here today, you can't recall any conversation in which the topic included the amount of clothing or the type of clothing that Ms. Lively's character ought to wear during the birthing scene?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember anything specific about clothing. That was definitely not the -- what we were talking about in terms of all the conversation around the -- our births.
BY MR. GOTTLIEB:
Q Did you ever ask Mr. Heath to share any portion of a video of his wife giving birth with Ms. Lively?
A I did.
Q Did you specify when you asked Mr. Heath to share that video with Ms. Lively what he should share from it or how much he should share from it?
MS. SHAPIRO: Objection.
THE WITNESS: The only video I'm aware of is after his -- after the birth of his child. So I believe there's only one that I asked him to share.

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BY MR. GOTTLIEB:
Q There's only one video that you're aware of that you've ever seen?
A That I asked him to share?
Q That you asked him to share with Ms. Lively?
A Yes.
Q And your testimony is that that video begins after the point that the baby was born?
A I have not watched the video in years. I believe it was the birth of his daughter. And my memory of the beginning of that video is that him and his wife Natasha and his baby are in a birthing tub surrounded by his family.
Q Do you have any knowledge, one way or the other, whether the entire event of the birth of Mr. Heath's child was filmed or put on video?
A I was not there.
Q You were not there?
A I was not at the birth of his child.
Q But do you know, one way or the other, whether there is video of his wife giving birth?
A As I said, I was not there so I would not know.
Q And were you present when Mr. Heath

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showed this video to Ms. Lively?
MS. SHAPIRO: Objection.
THE WITNESS: I was not.
BY MR. GOTTLIEB:
Q Do you know, one way or the other, how much of the video Mr. Heath showed to Ms. Lively?
A I have no personal knowledge of that.
Q Do you know whether Wayfarer Studios ever described the video that Mr. Heath showed to Ms. Lively as a birthing video?
A I don't.
Q Do you recall testifying yesterday about some communications with Melissa Nathan and the TAG team about a scenario planning document?
A Yes.
Q And I think it was in Exhibit 16 that was introduced yesterday and there was a document in which you were asked some questions about saying that you didn't feel that this scenario document -- scenario planning document was all that impressive. Do you recall testifying to that effect?
MS. SHAPIRO: Objection.
THE WITNESS: I don't recall my exact testimony from yesterday.

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BY MR. GOTTLIEB:
Q Do you recall yesterday saying that about the scenario planning document; you thought it wasn't that impressive and you felt like they were just trying to get the gig?
A It sounds like that's what I said and you're reading it, so I'm going to -- I'm going to say yes.
Q Do you recall testifying yesterday that you were feeling so scared and anxious that even if they had proposed to build an iron dome, you wouldn't have felt protected?
A I do remember that.
Q And you testified that you were extremely worried about the gloves coming off. Remember?
A As I think anyone would be. Yes.
Q Okay. First of all, at the point in which you were exchanging this information about the scenario planning document, do you recall when you were exchanging back-and-forth communications with Ms. Abel or Ms. Nathan about the scenario planning document and what TAG was proposing to do?
MS. SHAPIRO: Objection.
THE WITNESS: August.

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BY MR. GOTTLIEB:
Q If I told you that Exhibit 16 had a date of August 2nd on it, would that sound right to you?
MS. SHAPIRO: Objection.
THE WITNESS: I would believe you.
BY MR. GOTTLIEB:
Q At that point, you're not yet in New York for the press junket, right?
A On?
Q August 2, 2024?
A I was in Sweden, correct.
Q The first day of the press junket was August 5th; was that right?
A Thank you for telling me, yes.
Q On August 8th, you fly to Chicago; is that right?
A That sounds about right.
Q So on August 2nd, there is not a lot of social media chatter about the premiere and what is happening with the premiere, right?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know.
BY MR. GOTTLIEB:
Q But the edit is done, right?
A The edit?

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Q Of the film. The movie's done, right?
A It had been done for months, yes.
Q Posters were printed?
A Posters were printed, yes.
Q The trailer's been out for months?
A Correct.
Q All that is left at this point is the premiere, right?
A And more promotion.
Q And the thing that you're afraid of, the storm that you see coming, is the reaction to when you and the cast don't appear at the premiere together, right?
MS. SHAPIRO: Objection.
THE WITNESS: One of the things.
BY MR. GOTTLIEB:
Q What were you afraid people would infer when you and the cast did not appear together at the premiere?
MS. SHAPIRO: Objection.
THE WITNESS: I think what I was afraid of was what I didn't know people would infer. I think the Internet is a scary place, and I think that what happens is, when a situation is created, I believe intentionally, to leave Easter eggs that

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something could be amiss so that the Internet can fill in the blanks, I think anything is possible. I think imaginations can run wild, and I also think that -- that at that point, that's where lies can be told. And I think all of that was very scary to me.
BY MR. GOTTLIEB:
Q Did it occur to you at this time, Mr. Baldoni, that there might be a good reason why Jenny Slate didn't want to follow you on social media, and didn't want to appear alongside you at the premiere?
MS. SHAPIRO: Objection.
THE WITNESS: I had a perfectly fine working relationship with Jenny Slate from the moment that I was made aware that she didn't like my "sexy" comment about her wardrobe and all the hugs, so from that point on, Ms. Slate and I never had an issue, nor discussed anything.
BY MR. GOTTLIEB:
Q Did it occur to you that Isabela Ferrer might have a reason why she didn't want to appear alongside you at the premiere?
MS. SHAPIRO: Objection.
THE WITNESS: I was very confused by why Ms. Ferrer unfollowed me and wouldn't appear

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with me. I had no idea.
BY MR. GOTTLIEB:
Q Did you ask her why?
MS. SHAPIRO: Objection.
THE WITNESS: I think it was very clear that when a person publicly unfollows you, and also through channels tells you they don't want you at the premiere or they won't attend, I think I took the hint that I shouldn't reach out to anybody and ask.
BY MR. GOTTLIEB:
Q But you didn't reach out and ask, right?
A I did not believe that anything that I had to say could compete with any influence that Ms. Lively had.
Q Even though in your view, all of this was based on lies?
MS. SHAPIRO: Objection.
THE WITNESS: When you're dealing with, arguably, the most powerful couple in Hollywood with the most powerful friends in the world, mixed with someone who's extremely charming and personable and has so much to offer someone as young as her, by that point, there was nothing I believe I could have said to her that would -- that could affect any

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influence that Ms. Lively had had on her, so I did not even try.
BY MR. GOTTLIEB:
Q So it's your testimony that you believed that the reason that all of the cast members who unfollowed you and did not want to appear alongside you at the premiere, that all of them did that only because Blake Lively and Ryan Reynolds had pressured them to do so?
MS. SHAPIRO: Objection.
THE WITNESS: That's not my testimony.
BY MR. GOTTLIEB:
Q Is that what you believe?
A I believe that prior to meeting and working with Ms. Lively, I have never had anyone unfollow me or ask to not be seen in a photo with me. That's what I believe.
Q Because you had never experienced that before, are you saying that you attribute the cause of the unfollowing and the request to not appear alongside you at the premiere, you attribute the cause of all of that to Ms. Lively?
MS. SHAPIRO: Objection.
THE WITNESS: That's not my testimony.

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BY MR. GOTTLIEB:
Q Do you think your conduct on the set of It Ends with Us had anything to do with the decisions made by cast members, other than Ms. Lively, to not want to follow you and not appear alongside you at the premiere?
MS. SHAPIRO: Objection.
THE WITNESS: I am unsure if --
MR. GOTTLIEB: Can you repeat the question? This is not working for me.
THE STENOGRAPHIC REPORTER:
(Record read as follows):
"Do you think your conduct on the set of It Ends With Us had anything to do with the decisions made by cast members, other than Ms. Lively, not wanting to follow you and not appearing alongside you at the premiere?"
THE WITNESS: I can't speculate and answer that question.
BY MR. GOTTLIEB:
Q You don't know what their motivations were?
A I think it's impossible to know what anybody's motivation is.

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Q And you didn't ask what their motivations were?
A I did not ask what anyone's motivations were.
Q And notwithstanding that you were very concerned and very afraid, you did not initiate an investigation at this point in time to clear your name?
MS. SHAPIRO: Objection.
THE WITNESS: I did not initiate an investigation at that time.
BY MR. GOTTLIEB:
Q Instead, you retained The Agency Group, right?
MS. SHAPIRO: Objection.
THE WITNESS: I would not classify it as that.
BY MR. GOTTLIEB:
Q And you commissioned the scenario planning document to get ahead of what you thought might be coming?
MS. SHAPIRO: Objection.
THE WITNESS: I just want to go back. I did not use the word instead of investigating. I just want to say that's not it. I disagree.

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BY MR. GOTTLIEB:
Q You didn't investigate, correct?
A I did not investigate.
Q You didn't talk to the cast members who had unfollowed you, correct?
A Correct.
Q You didn't go out and give an interview and speak publicly where you said, I'm concerned there are misconceptions or misapprehensions about what has happened on the set; you didn't do that, right?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q Instead, what you did is, you asked your team to prepare a plan in the event that any information became public, right?
MS. SHAPIRO: Objection.
THE WITNESS: No.
MR. GOTTLIEB: Okay. Thirty-eight.
(Exhibit 38 marked for identification.)
Exhibit 38 -- Exhibit 38 is a document bearing Bates Nos. NATHAN 5497 through 5506. And I will represent to you, sir, there are two versions of the same document attached to this at the end, so

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you'll only --
THE WITNESS: Is there any reason for that?
BY MR. GOTTLIEB:
Q That's how it was produced to us. And so in looking through this, you only need to look through the texts and the first four pages there.
A So I'm not to look at the document?
Q You can look through the texts, and then just -- all I'm saying is, you don't need to read the same document twice.
A Are we sure you know it's the exact same document?
Q I'm going to represent to you that it is.
A Okay. But are we sure?
Q Your lawyers will call me on that if I'm lying.
MR. GOTTLIEB: I'm wrong. It's very different. I will retract my statement, and you may review whole thing.
THE WITNESS: She didn't even have to call you out on it.
MR. GOTTLIEB: I apologize. I was mistaken. My mistake.
THE WITNESS: Can I borrow this pen?

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BY MR. GOTTLIEB:
Q Sure.
I'm sorry, Mr. Baldoni. I can represent to you, if you look at the text, that the only difference between the two documents is reflected in that second message on the text page, is a correction.
A You mean you can represent to me what you just did?
Q Yeah.
A But you were just wrong.
Q Do you want to read the text?
A I'm just -- not that I don't trust you, but in the same way, I just want to read it, if that's okay.
Q Okay.
MS. AHOURAIAN: Sorry, I would like to clarify. So these are duplicates of the -- I know you've been going back and forth about that.
MR. GOTTLIEB: No, there's a change made. There's one change.
MS. AHOURAIAN: Between this and this?
MR. GOTTLIEB: There's two documents attached at the end. They're both attachments that are referenced in the text messages, which you will

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see if you follow through. And there's a description of the change that's made in the text messages.
MS. AHOURAIAN: Got it. Thank you.
MR. GOTTLIEB: And, again, this was how the document was produced to us.
MS. AHOURAIAN: Understood.
BY MR. GOTTLIEB:
Q Mr. Baldoni, I'm going to ask you to stop your review now. You've been reading this document for ten minutes, and I promise you I will not ask you questions -- any questions about the differences between the two versions of this.
A I just want you to know, I just finished reading this, and I felt like I was reading at a decent speed.
Q Okay. I'm not -- I'm stating for the record the reason I'm asking you to stop your review now.
This is a document that is a text message exchange between you, Mr. Heath, Ms. Case, Ms. Nathan and others on August 2nd, 2024; is that correct?
A That appears to be correct.
Q And there are two versions of this

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scenario planning document that are attached to this; is that right?
A That's what I'm taking yours and everyone's word for.
Q Okay. And you recall being sent this scenario planning document; is that right?
A Again, I believe I do.
Q You testified about it yesterday feeling that it didn't provide the protection that you were looking for at the time?
A Is this the same version of the document that I was testifying about yesterday?
Q Can we agree that you testified about a scenario planning document sent to you by TAG that you were unimpressed with?
MS. SHAPIRO: Objection.
THE WITNESS: Yes. I just don't know if that's this one or not.
BY MR. GOTTLIEB:
Q Okay. Do you know as you sit here today, which, if any, of the services or activities or tactics laid out in the scenario planning documents were put into motion?
MS. SHAPIRO: Objection.
THE WITNESS: My understanding, based on

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my directives, and I believe Mr. Heath's, was that nothing was to be put into motion. We were in a completely defensive place.
BY MR. GOTTLIEB:
Q Did you know that alongside Jen Abel and her team, TAG did, in fact, manage media inquiries regarding the news on background as sources familiar?
MS. SHAPIRO: Objection.
THE WITNESS: I don't know what that means.
BY MR. GOTTLIEB:
Q You don't know what it means to talk to the media as a source familiar?
MS. SHAPIRO: Objection.
THE WITNESS: A source familiar, specify, please.
BY MR. GOTTLIEB:
Q You don't know what it means to talk to a reporter not on the record and an official statement, but rather, saying you, reporter, can print this is what happened based on a source familiar?
MS. SHAPIRO: Objection.
THE WITNESS: Being very honest, the way

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that you're describing it is not something that I -- I mean, I know they speak to reporters. That's their job in PR. But a source familiar is not something I've heard.
BY MR. GOTTLIEB:
Q So you knew that Ms. Abel and the TAG team were talking to reporters during their engagement?
A I -- I mean, Ms. Abel's engagement, that's her -- that's her job, is to speak to reporters.
Q Okay. So I'm asking you if you know one way or the other, whether TAG and Ms. Abel were managing media inquiries regarding the news on background as sources familiar?
MS. SHAPIRO: Objection.
THE WITNESS: I was not with them, so I would have no way to know one way or the other.
BY MR. GOTTLIEB:
Q Did you have a view on whether you wanted them to be doing that?
MS. SHAPIRO: Objection.
THE WITNESS: Yes, I did. I had a very strong view.

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BY MR. GOTTLIEB:
Q And what was that view?
A I didn't want them saying anything that was negative about anybody or anything.
Q You didn't want them saying anything that was negative about anyone or anything even on background?
A Absolutely.
Q Even off the record?
A I don't know if I can be more specific than I just was.
Q Do you know if they ever, Ms. Abel and TAG, working on your behalf, said anything negative about anyone to members of the media during this period of time in August of 2024?
MS. SHAPIRO: Objection.
THE WITNESS: Again, I don't know how I would know that.
BY MR. GOTTLIEB:
Q Did you want TAG to be providing information to ensure that your narrative was properly represented in any and all coverage?
A That my narrative was properly representative in any and all coverage? The only narrative that I wanted to make sure was properly

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represented was my original intentions for why I wanted to make this movie. That was extremely important to me.
Q Do you know, one way or the other, whether TAG confirmed that outlets on intending covering the story, especially those impactful to your, Mr. Heath's, and Wayfarer's interests, were fully briefed on the situation, including and not limited to The Hollywood Reporter, Variety, Deadline, The Wrap, New York Post, Daily Mail, et cetera?
MS. SHAPIRO: Objection.
THE WITNESS: I feel like I can save you a lot of questions by telling you that this was a scenario planning document that was never, from my end, given approval to execute on any level.
BY MR. GOTTLIEB:
Q Any piece of this document?
MS. SHAPIRO: Objection.
THE WITNESS: Yes.
BY MR. GOTTLIEB:
Q It's your testimony that you believe that you never approved TAG or Ms. Abel doing any of the things that are listed in this document?
A I believe we started this conversation by

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you saying if I remembered my testimony and that I wasn't satisfied with this document. So if I'm answering your question the way that I think you're asking it, then that would be yes, because I did not like this document. I didn't find it to be amazing. And so there was nothing that could be approved from it. I didn't ever approve this document.
Q You wanted TAG to do something else?
A I was not satisfied with this particular document.
Q And you had a call following up on this scenario planning document with Ms. Nathan and Ms. Abel, right?
A I don't remember the specifics of the call, but I'm sure I did.
Q Did they talk to you in that call about what it would mean to get ahead of the narrative?
A Not that I remember.
Q You have no recollection of discussing with Ms. Nathan or Ms. Abel things that could be done to get ahead of the narrative that you were afraid might come out?
MS. SHAPIRO: Objection.
THE WITNESS: My conversations with Ms. Abel and Ms. Nathan were very few together. And

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they were very, very clear that I wanted to focus on the good.
BY MR. GOTTLIEB:
Q Do you remember looking at a document that had a post of Hailey Bieber embedded in it yesterday; it was Exhibit 17?
A I can't recall the exhibit number, but I do remember the document.
Q And you testified that -- I will represent to you --
A Is this still -- are we done?
Q We're done.
I will represent to you that Exhibit 17 that was admitted yesterday was a text exchange with you, Ms. Abel -- you and Ms. Abel on August 5th, 2024.
A Do you have it? I would love to see it so I can reference it.
Q Well, I'm going to just ask you some questions. August 5th was the start of the press junket, right?
A If that's the date you gave me before, then I will continue to believe you, yes.
Q And you testified yesterday that there was a reference to friction that you and Ms. Abel

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discussed, and you had used the word "friction" in an interview that you had given, and Sony had objected to that. Do you recall that?
MS. SHAPIRO: Objection.
THE WITNESS: I remember a text message where she was saying that Sony didn't like the word "friction." But, again, it would be easier if you would give me the document because then I can respond to it.
BY MR. GOTTLIEB:
Q I understand that. Do you recall the text message Ms. Abel sent to you saying:
(As read):
"Sony is having a hard time with the word 'friction.' They think it will be taken out as clickbait. They obviously don't know about our strategy. But let's stick to the word of 'challenge' in the role that you had as a director to get everyone to come together and be on the same page to create something beautiful."
Do you remember that exchange?
A Yes, I do, from yesterday's deposition.
Q You testified that the reference to

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"friction" was part of the strategy to saying only positive things and not drawing attention to the situation; is that right?
MS. SHAPIRO: Objection.
THE WITNESS: Do we have my testimony, and I can just confirm that was exactly what I said, or are you paraphrasing that?
BY MR. GOTTLIEB:
Q Is that consistent with your recollection?
A I believe so.
Q Isn't it, in fact, true that the use of the word "friction" was itself a press strategy to get ahead of a particular narrative?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure. I feel like that's -- there's only so many words you can use to describe in a positive way what was experienced.
BY MR. GOTTLIEB:
Q Would you be surprised to learn that TAG and Ms. Abel had specifically discussed you using the word "friction" in order to plant a seed and get ahead of a narrative?
MS. SHAPIRO: Objection.
THE WITNESS: I don't agree with the way

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that you are characterizing that question.
BY MR. GOTTLIEB:
Q Did you agree with Sony that the word "friction" at a time when there was speculation in the fan community about a feud, was clickbait?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember agreeing with much of anything Sony was saying during that time.
BY MR. GOTTLIEB:
Q Including their advice about how to market the film?
A I believe from day one, before I even sold the film to Sony or partnered with them, we had disagreements on how to market the film.
Q And it is in response to that message about friction from Ms. Abel that you sent Ms. Abel the message, the screenshot of the Hailey Bieber thread from Twitter, right?
A No.
Q It's not?
A No.
Q You said it in response to what?
A Would you mind reading me the time of my message and the time of the Hailey Bieber message?

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Q Sure. The time of the first message from Ms. Abel is 10:42 a.m., and the time of your message to Ms. Abel about Hailey Bieber is at 12:06 p.m.
A So I don't have a calculator, but could you help me with how much time is between those two texts?
Q I think you know how much time is between those two texts.
A I genuinely don't know how much time.
Q What is it you would like to say?
A Well, your question was, was it a response?
Q And your testimony, I gather, is, no, it was not?
A That is my testimony, that it was not a response.
Q Okay. What were you responding to when you said, "this is what we would need," and you sent the text -- the Twitter thread of Hailey Bieber?
MS. SHAPIRO: Objection.
THE WITNESS: That's -- I don't agree with the question. I can't answer that.
BY MR. GOTTLIEB:
Q What were you sent -- what were you trying to convey -- no, strike that.

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Why did you send this text message at 12:06 p.m. to Ms. Abel in which you say:
(As read):
"This is what we would need."
And the only thing you have put into the text message is a screenshot of a Twitter thread where the line at the top says:
(As read):
"Hailey Bieber's history of bullying many women, not just Selena Gomez, throughout the years thread."
MS. SHAPIRO: Objection.
THE WITNESS: That's a very long question you just asked me.
BY MR. GOTTLIEB:
Q Why did you send that to Ms. Abel?
A But I can't answer the "why." It was not a response. That's why I couldn't answer the question.
Q Why did you send it to Ms. Abel?
A Again, we were in a place of defense. And as you may have seen from many of the early text threads you've shown me, I was afraid. At this point, I felt I was up against Goliath and Blake Lively and her husband, Ryan Reynolds, and everyone

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in their circle, Hugh Jackman, Shawn Levy, Taylor Swift.
By that point, as I testified earlier, I was essentially forced, or threatened, to step down off my film. I wasn't able to finish my own film even considering it tested higher. Somehow the actress of my movie who was not a producer was able to take complete control of the film.
By this point, Ms. Lively had requested that my name be removed. So I had my "a film by credit" removed. I was removed from the majority of marketing materials, from the poster. I was being removed, for the most, from the trailer. I know that she had been working with Taylor Swift to make sure that she got the song that she wanted in the film. And I had assumed that that was not a battle or a fight that I could ever win.
All of the cast had unfollowed me. Which is a very public thing to do right before a movie comes out, all in unison. And at that time, I was being threatened via my agency that if I didn't release a statement, then -- then the gloves would come off.
Now, I don't know the exact sequence of the time in which I sent that text. But I will tell

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you that the feeling and the aura around the environment that was created, not by me at that time, created a lot of fear. I didn't know what was possible. So we were in a defensive mode because at this point, I didn't know what Ms. Lively or her group of powerful Hollywood elites were capable of.
So I saw a message -- or I saw a tweet, which I did not read, and I saw that it was a celebrity woman who had a history of bullying. And I resonated with the term "bullying" because to me that was a true statement to what I experienced. I felt I was being very bullied.
So I sent that to Ms. Abel on a whim in an emotional state, but I made sure to preface it with, this is what we would, with an emphasis and the operative word being "would" need. Not that we need to do this. Not that I want this. But this is what we would need if lies were to be spread about me intentionally.
Q The gloves would come off conversation hadn't happened at the time you sent this, right?
A So then we can imagine that that conversation -- it was all mixed into the same feeling, but the feeling I had was everything else that I said.

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Q You hadn't been threatened yet?
MS. SHAPIRO: Objection.
THE WITNESS: I wouldn't agree with that.
BY MR. GOTTLIEB:
Q You mentioned being -- having your "film by credit" removed?
A Yes.
Q Do you know what another word for the "film by credit" is in Hollywood?
A I would love you to educate me.
Q Have you ever heard it referred to as the "vanity credit"?
A No.
Q Do you understand that there is significant controversy in the industry, in your industry, over the use of the "film by credit"?
A I was not aware.
Q Are you aware that it has been criticized by a number of directors because it conveys that all of the people who work on a movie are less important than the director?
MS. SHAPIRO: Objection.
THE WITNESS: I was not aware until you just said that.

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BY MR. GOTTLIEB:
Q Did Ms. Lively -- was she the cause of your "film by credit" being removed from this movie?
A What was relayed to me was that Ms. Lively requested it be removed.
Q Do you know what other directors you admire and look up to do with respect to the "film by credit"?
MS. SHAPIRO: Objection.
THE WITNESS: I wouldn't know.
BY MR. GOTTLIEB:
Q Would you want to have a credit that's known as the "vanity credit" be something you sought on a film written by Colleen Hoover with the screenplay, a woman, screenplay written by a woman, with many women acting on it, would you want a credit that's known as the "vanity credit" attached to your name?
MS. SHAPIRO: Objection.
THE WITNESS: Until you brought it up right now, this was the first I'd ever heard of it.
BY MR. GOTTLIEB:
Q You never thought to ask?
MS. SHAPIRO: Objection.
THE WITNESS: I'm not sure how I can ask

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about something I don't know about.
BY MR. GOTTLIEB:
Q Did Ms. Lively remove you from the trailer?
A What was related to me was that she was attempting to.
Q Who had approval authority over the trailer?
A What do you mean exactly?
Q Who had approval authority over the trailer, the trailer that was released? Who was in charge?
A I believe Ms. Lively.
Q You believe Blake Lively had the approval authority over the final trailer that was released for the film It Ends with Us?
A From my understanding, in many ways that's what she claimed in her letter to the Producers Guild of America.
Q Did you ever ask Sony's president why your "film by credit" was removed?
A Sony's president relayed to Jamey, it's my understanding, or it could have been Ange, why my "film by credit" was removed.
Q Did you ever confirm with anyone who

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actually made the decision about the final composition of the trailer?
MS. SHAPIRO: Objection.
THE WITNESS: I spoke to -- I was having some conversations with Ange Giannetti and some of the people involved in the trailer.
BY MR. GOTTLIEB:
Q Did you do a promotional event at the release -- upon the release of the trailer?
A I did.
Q Was Ms. Lively there?
A She was not.
Q Was Colleen Hoover there?
A Yes.
Q Was there a floral pop-up shop?
A I believe there was.
Q Did you make bouquets?
A With Ms. Hoover, I did.
Q You and Ms. Hoover made bouquets?
A I believe that's what I just said.
Q For influencers and fans?
A It was a pop-up shop for influencers and fans, correct.
MR. GOTTLIEB: Can I get a time check, please? And can we go off the record?

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THE VIDEOGRAPHER: We are going off the record. The time is 6:36 p.m.
(Recess.)
THE VIDEOGRAPHER: We're back on the record. The time is 7:05 p.m.
MS. SHAPIRO: I just want to note for the record, that we have now been going for 13 hours and 35 minutes with Mr. Baldoni. We took a break that was supposed to be 15 minutes. It has now been almost half an hour. And we are all very tired. The witness is extremely tired, and this is unacceptable.
MR. GOTTLIEB: Noted.
BY MR. GOTTLIEB:
Q Did you record the January 4th, 2024 meeting?
A Can you ask that one more time?
Q Did you record the January 4th, 2024 meeting that happened in Ms. Lively's apartment?
A No.
Q Did Mr. Heath?
A I'm unaware of any such recording.
Q Are you aware of anyone on your team having recorded that meeting?
A Mr. Heath is the only person on my team

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that was at that meeting.
Q Okay.
A So I guess to answer your question, no.
MR. GOTTLIEB: This is Exhibit 39. This is a document that was Exhibit 18 from yesterday, and what we were searching for before we went back on the record here.
(Exhibit 39 marked for identification.)
THE WITNESS: Okay.
BY MR. GOTTLIEB:
Q And so you testified about this exhibit yesterday. We've marked it as Exhibit 39 for everyone's convenience because we don't have the exhibits from yesterday here with us. So Exhibit 39 is a text chain that you testified about yesterday, between you, Ms. Nathan, Ms. Abel, the three of you, on August 15th, 2024.
Do you recall testifying about this text chain yesterday?
A I believe I do.
Q And in this text chain on the 15th of August, you were talking about how Mr. Sarowitz had asked you about:
(As read):
"Flipping the narrative from this leak

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this a.m. about Ryan saying script was a disaster and he saved the movie."
Do you see that?
A If it's okay I'm -- I know I testified yesterday, but I'm just going to read it very quickly so then I can answer all your questions.
Q Okay.
A Thank you.
Q Exhibit 18 from yesterday and Exhibit 39 from today, is an exchange on the 15th of August between you, Ms. Nathan, and Ms. Abel?
A Yes.
Q And you talk about something Mr. Sarowitz had said to you earlier about:
(As read):
"Flipping the narrative from the leak this a.m. about Ryan saying script was a disaster and he saved the movie"?
A Yes.
Q And I think you testified that you were unsure what the basis of the belief that Ryan had said the script was a disaster and saved the movie was; is that right?
A I -- what I'm saying here, if I read my words, is "from this leak this a.m." so some sort of

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leak that morning, so an article.
Q Do you know whether Mr. Reynolds himself ever had said publicly that the script was a disaster and that he saved the movie?
A I don't think I could know.
Q Do you know whether he ever said that privately?
A I don't think I could know that.
Q So you don't know whether this statement attributed to Mr. Reynolds was actually made by him at any point in time?
A I don't think it's possible that I could know that.
Q Do you know the point in time at which Mr. Reynolds was alleging to have worked on or saved the script, according to what you were responding to here?
MS. SHAPIRO: Objection.
THE WITNESS: What I know is that during the premiere, Ms. Lively, for some reason, offered up the fact that her husband wrote the -- what is arguably one of the top five most important scenes in the film. And I believe this appeared to be PR that was trying to justify or calm the backlash that was caused by Ms. Lively's own words.

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BY MR. GOTTLIEB:
Q And in response to that, you suggest on the next page over, at two o'clock, page marked 15408:
(As read):
"The fact that they saved the script from what they think is a disaster after we had a green lit script and was a strike, basically implies they were scabs."
Do you see that?
A Yes.
Q And you said:
(As read):
"Which we should 100 percent lead them to."
Do you see that?
A I do.
Q You were writing during the strike; were you not?
A I was.
Q So you were a scab?
A I would have no problem being called a scab.
Q And what you wanted to do was lead

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reporters to the fact that in response to this sourced statement, what they should really be printing is that Mr. Reynolds and Ms. Lively were scabs?
MS. SHAPIRO: Objection.
THE WITNESS: No.
BY MR. GOTTLIEB:
Q Knowing that you had written during the strike?
MS. SHAPIRO: Objection.
THE WITNESS: I'm sorry. I just said no.
BY MR. GOTTLIEB:
Q I'm going to ask my questions --
A Is that a different question?
MS. SHAPIRO: Please.
BY MR. GOTTLIEB:
Q You've answered no.
MS. SHAPIRO: Counsel --
BY MR. GOTTLIEB:
Q And the next question is, you knew you had written during the strike, correct?
A Yes.
Q And you knew that Wayfarer had asked people who are comfortable to come to work during the strike; is that right?

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A Like every other production, correct.
Q Did you want reporters to know that?
A I was not hiding that.
Q Is being called a scab a positive or a negative implication in your view?
A I'm not sure I can answer that.
Q But you wanted reporters to go in that direction, right?
MS. SHAPIRO: Objection.
THE WITNESS: What I believe I was doing was passing on a message from my partner, Steve, who relayed to me after reading a story that appeared to be in response from something Ms. Lively said on her own. She was not even asked about whether or not her husband wrote a scene. And then, because of that, received a lot of negative backlash, as did Mr. Reynolds, because why would Mr. Reynolds be a WGA writer writing a scene in someone's movie that he's not credited for. And so Steve, seeing Mr. Reynolds' apparent leak that the script was a disaster, which seemed like he was trying to save his own image in that moment, asked me to pass on to Melissa and Jen that an idea could be presented, which would be flipping this narrative that our movie was a disaster to begin with.

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And this, again, was a purely defensive conversation. There was an offensive move done to say that our script was originally a disaster, and we were implying that this could happen. We did not say, go do it. I don't -- unless you have something where I did.
BY MR. GOTTLIEB:
Q Do you have -- you characterize these as offensive and defensive; yet, you have admitted that you have absolutely no idea whether Mr. Reynolds ever said that the movie was a disaster that he saved?
MS. SHAPIRO: Objection.
THE WITNESS: Untrue. I do know he said it.
BY MR. GOTTLIEB:
Q You know that he said that the movie was a disaster that he saved?
A Yes.
Q Okay. And you know that how?
A He said it at the January 4th meeting, in person, to my face.
Q And did he say that in public any time that you ever heard him say that?
A I found it odd that something he said to

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me in a very angry, aggressive tone at a meeting in front of my partners and my best friend somehow ended up magically in the press during a time when there was supposed to be a truce, as soon as his wife, Mrs. Lively, made him look really bad on her own.
Q It's awfully convenient that you remember that right now, isn't it, Mr. Baldoni?
MS. SHAPIRO: Objection.
THE WITNESS: You did bring up a lot of things for me to remember over this and --
BY MR. GOTTLIEB:
Q Did you --
A Yes. I did remember just now.
Q Did you ever communicate in writing to anyone at any time about the January 4th meeting that Mr. Reynolds said that?
MS. SHAPIRO: Objection.
THE WITNESS: There was a lot of things Mr. Reynolds said that I never shared with anybody outside of my wife, as it was extremely humiliating, embarrassing, and traumatic to me.
BY MR. GOTTLIEB:
Q Do you recall when you learned that Mr. Reynolds had blocked or unfollowed you on social

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media?
A Are you looking for the exact date because I do not have that?
Q Estimate?
A No. I remember the feeling.
Q Do you remember what month it was in?
A July or August, I'm assuming.
Q If I told you that you learned about it in May of 2024, would that surprise you?
MS. SHAPIRO: Objection.
THE WITNESS: It wouldn't surprise me. That entire time period is a big mess.
BY MR. GOTTLIEB:
Q Do you recall ever sending content to your digital team to boost or amplify?
A Yeah, I do.
Q Do you know how the digital team -- who is the digital team?
A I -- I have no idea. I knew there was a digital team. I assumed it was the people that we had hired from TAG.
Q Do you know what it meant -- did you understand what it meant for them to boost or amplify content you were sending to them?
A Technically, no, but I remember at the

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time assuming that it meant what the word "boost" is, like to -- you know, like if I'm going to give my son a boost, I'm going to help him up. So to boost.
Q And you -- but as you sit here today, you don't have an understanding of how that team went about boosting or amplifying the content you sent for them to -- to boost?
A I don't.
Q Do you have any recollection as you sit here today about the number of pieces of content you sent through to the digital team while they were engaged to boost or amplify?
MS. SHAPIRO: Objection.
THE WITNESS: I don't.
BY MR. GOTTLIEB:
Q Do you believe that the digital team you retained didn't do any actual work?
MS. SHAPIRO: Objection.
THE WITNESS: Do I believe they didn't actually boost or amplify? I have no idea.
BY MR. GOTTLIEB:
Q You don't know what they did?
A I have no idea if they actually did what or boosted what we asked them to boost.

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Q Do you know how much Wayfarer Studios ultimately paid Street Relations for its work?
A I don't.
Q Would it surprise you to learn that Wayfarer Studios paid Street Relations approximately $100,000 for its work?
MR. GLOVER: Objection. Form.
MS. SHAPIRO: Objection.
THE WITNESS: I don't think that would surprise me.
BY MR. GOTTLIEB:
Q Do you think Mr. Heath would spend $100,000 of Wayfarer's money paying a vendor that did nothing?
MS. SHAPIRO: Objection.
MR. GLOVER: Objection. Form.
THE WITNESS: I can't speculate as to what Mr. Heath would do or would not do with $100,000.
BY MR. GOTTLIEB:
Q What was your share of the profits derived from the film It Ends with Us?
A I believe I had a back-end deal of around -- I don't know all the, like, plus, minus, costs all that stuff, but I think the number was

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around 10 percent.
Q Do you know how much in total compensation, roughly, you received in all forms of payment from the film It Ends with Us?
A To date, I don't know.
Q Do you have any estimate of the amount?
A To date?
Q To date.
A I would guess somewhere between 3- and 5 million.
Q Do you think your total share of compensation -- well, let me put it this way. Were you paid as director a fee or an amount?
A Yes.
Q Were you paid as an actor a fee or amount?
A Very small amount, yes.
Q And then, you had some share of profits in an agreement that was with Wayfarer Studios or It Ends with Us LLC?
A I don't have a share of profits that I'm aware of based on any agreement.
Q What do you have a share of profits based on?
MS. SHAPIRO: Objection.

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THE WITNESS: To my knowledge, I have ownership stake in the entire company.
BY MR. GOTTLIEB:
Q And so your -- the amount of money that you have made off of the film is derived from a combination of what you were paid as a director, what you were paid as an actor, and your ownership interest in the company?
A False.
Q Please correct me.
A I do not pay myself from any ownership interest in the company.
Q You were entitled to a share of profits from the company, but you've elected not to take it; is that what you're saying?
A Mr. Sarowitz and I have a different agreement than that.
Q What is your different agreement with Mr. Sarowitz?
A That I do not take or we do not take any percentage that isn't -- the studio has not -- hasn't returned a profit, so taking from anything that is not profitable would be taking from the studio. So while the success of the film is amazing, and the studio did make money, Mr. Sarowitz

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has invested, to my knowledge, over $100 million and that's nowhere near the amount of profit we made on It Ends with Us. So I have not taken, nor will I take any share of that.
Q Is there documentation that memorializes what you just said to me?
A I don't believe so.
Q Is there documentation that would show the payments that you have received, if any, derived from the film It Ends with Us?
A Of course.
Q Have you produced those to us?
A My lawyers have everything that would need to be produced, so I would assume that if that was something that would need to be produced, that they would produce it.
Q Do you recall telling us in an interrogatory response that you first anticipated litigation about It Ends with Us in August of 2024?
A I don't remember, but I'm assuming that's correct.
Q Did you understand after that point in time that you were required to preserve all documents concerning the litigation that you anticipated?

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A No.
Q When did you understand that?
A I believe this last week.
Q This last week is the first time you understood that you were required to preserve documents in this case?
A Yes, but I preserve them anyways.
Q What steps did you take to preserve your documents, if any, in August of 2024?
A By not deleting anything.
Q Okay. So you didn't delete anything. Did you have any understanding of the retention policies that existed on your email account?
A Can you be more specific?
Q Do you have any knowledge as you sit here today one way or the other, whether the email accounts that you use have retention policies on them?
MS. SHAPIRO: Objection.
THE WITNESS: Retention, meaning like they stay or they don't stay?
BY MR. GOTTLIEB:
Q They stay or they get deleted after a period of time.
A I always have on all my e-mails that they

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never delete.
Q Do you use a Wayfarer Studios email address?
A That's one of my emails, yes.
Q And do you know for a fact that that email account, the retention policy, is set to never delete?
A I believe I intentionally make sure that it never deletes because I always go back and look for emails.
Q Did you talk to somebody at Wayfarer Studios about setting that policy for your email?
A I believe I did. All -- all Gmail, all my personal emails, everything never -- nothing deletes.
Q How about WhatsApp?
A I have all my WhatsApps. They don't delete.
Q You don't have any chains in WhatsApp that have an auto delete timer on them?
A I don't think I was aware that WhatsApp had that function.
Q How about Signal?
A Signal? What about it?
Q Are all of your chats in Signal set to

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retain indefinitely?
A They are now.
Q I thought you testified yesterday that certain of your Signal chats were set to retain indefinitely and certain were not?
A Yeah, but then I wanted to make sure that they were all set to retain indefinitely.
Q So is it your testimony that the chats that you mentioned with your friends, not with your -- not with lawyers and your co-defendants, but chats that you have on Signal with your friends, are set to be preserved indefinitely?
A Yes. It should be.
Q What about your handwritten notes that you've taken in notebooks?
MS. SHAPIRO: Objection.
THE WITNESS: What about them?
BY MR. GOTTLIEB:
Q Did you take any steps to go search through them to find responsive ones to give to your attorneys?
A I did. I produced them.
Q And those have all been produced to us to the best of your knowledge?
A Yes.

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Q Do you recall about when you instructed your social media team to start posting you only talking about domestic violence and clips?
MS. SHAPIRO: Objection.
THE WITNESS: I don't remember the date.
BY MR. GOTTLIEB:
Q Okay. I will represent to you that -- that this text is from August 8th, 2024 at 3:30 p.m.
A Okay.
Q And you've written:
(As read):
"Hey, just landed. What is the TikTok strategy? I'd like you guys to start posting me only talking about domestic violence in clips and why this movie is so important."
Does that sound like a text you would have written?
A It does.
Q Do you know why you were sending that instruction at 3:30 p.m. on August 8th, 2024?
A Because I felt like that's what I wanted.
Q Do you know where you had just landed from?

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A I don't.
Q Do you recall flying around the 8th of August to Chicago with Mr. Heath and Ms. Abel and others in New York?
A I do.
Q Is it possible that you had just landed from that flight from New York to Chicago when you sent this message to your team?
MS. SHAPIRO: Objection.
THE WITNESS: It's entirely possible.
BY MR. GOTTLIEB:
Q Do you recall following up with the team in a conversation about the content that you wanted posted on your social media feeds from this point forward?
A I don't remember a specific follow-up conversation.
Q Do you recall changing your profile?
MS. SHAPIRO: Objection.
THE WITNESS: I do.
BY MR. GOTTLIEB:
Q And putting a link to No More in your profile?
MS. SHAPIRO: Objection.
THE WITNESS: Yes, I do.

BY MR. GOTTLIEB:
Q And you don't have any memory as you sit here today about why it was at that moment on the 8th of August that you made the decision to do that?
MS. SHAPIRO: Objection.
THE WITNESS: Specifically at that moment, I don't.
BY MR. GOTTLIEB:
Q Why didn't you do that at the start of the press junket?
MS. SHAPIRO: Objection.
THE WITNESS: I think at the start of the press junket, I had extreme anxiety because I was not welcome at my own film premiere. And I think that I was in fight or flight. And if I'm honest about some of those things, I don't think I was thinking about PR strategy; I was thinking about survival.
BY MR. GOTTLIEB:
Q Do you recall asking anyone from your team around this time to go through your private DMs to look for messages?
A Yes.
Q Do you recall asking them to look for -- specifically look for messages from survivors?

A Yes.
Q Do you recall asking them to read and respond to some of those messages on your behalf?
A Yes.
Q Did that happen?
A Yes.
Q Does that mean, Mr. Baldoni, that -- strike that.
Do you know if messages were sent from your social media accounts to whoever was sending you messages?
A I had asked NoMore.org. Specifically, I had asked to employ a survivor who was sensitive to this topic because I was receiving so many messages from survivors who were sharing very personal, deep, traumatic things. Survivors are reaching out to me and saying that they need help leaving their abuser. I didn't feel I was qualified to answer. And I couldn't sleep at night knowing that I might ignore a message from a woman who could die, if I don't respond. And one of my goals and missions that you have shown me today, is that I did believe this movie, as lofty as it sound, could save a life.
And so I asked No More, we employed a survivor, and her job for weeks was to just go

through my DMs and respond to women who needed help. Men who were also sharing their stories. And make sure that they felt seen and were able to get the help that they deserved and needed. I was not qualified for that task.
Q I appreciate all that, Mr. Baldoni. My only question for you is whether you know, in sending those responses, did those responses come from your own social media account?
A They did, as those responses were in response to things that came -- like people were pouring their hearts out to me, Justin.
Q Do you know whether those responses disclosed that you were -- you were not the one that was reading and responding to the messages?
A I don't.
Q Okay.
MS. SHAPIRO: How much time is left?
MR. GOTTLIEB: You don't need to ask. I'm done.
MS. SHAPIRO: Good.
THE VIDEOGRAPHER: We are going off the record. The time is 7:29 p.m.

(WHEREUPON THE DEPOSITION CONCLUDED AT 7:29 p.m.)

CERTIFICATE OF DEPONENT

I have read the foregoing transcript of my deposition and except for any corrections or changes noted on the errata sheet, I hereby subscribe to the transcript as an accurate record of the statements made by me.

_____
JUSTIN BALDONI

SUBSCRIBED AND SWORN before and to me this ____ day of _____, 20___.

_____
NOTARY PUBLIC

My Commission expires:

REPORTER'S CERTIFICATE

I, ASHLEY SOEVYN, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was put under oath by me;

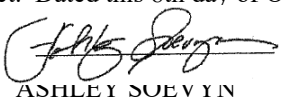
That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That a review of the transcript by the deponent was/ was not requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 8th day of October, 2025.



ASHLEY SOEVYN
CSR No. 12019

ERRATA SHEET
VERITEXT/NEW YORK REPORTING, LLC

CASE NAME: Blake Lively v. Wayfarer Studios LLC, Et Al.
DATE OF DEPOSITION: 10/7/2025
WITNESSES' NAME: Justin Baldoni

PAGE	LINE (S)	CHANGE	REASON

_____
Justin Baldoni

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_____ _____
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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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