

EXHIBIT 34

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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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.

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VIDEO-RECORDED DEPOSITION OF MELISSA NATHAN

Los Angeles, California

Monday, September 29, 2025

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

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Consolidated Plaintiffs,

vs.

BLAKE LIVELY, et al.

Consolidated Defendants.

****CONFIDENTIAL****

Video-recorded Deposition of
MELISSA NATHAN, 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 9:35 a.m. and
ending at 7:32 p.m. on Monday, September 29, 2025,
before me, ASHLEY SOEVYN, California Certified
Shorthand Reporter No. 12019.

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1 my text?

2 Q In general.

3 A No.

4 Q And did you at any point during the time
5 period of July 1st, 2024 to the present, ever have
6 an auto delete function enabled on your regular
7 messaging app on your phone?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: No.

10 BY MR. GOTTLIEB:

11 Q You sometimes use Signal; is that right?

12 A I do.

13 Q And you were using Signal, at least for
14 some purposes, in July and August of 2024; is that
15 right?

16 A It is.

17 Q And Signal is not like the standard Apple
18 messaging product; is that right?

19 A I can't speak to the Apple messaging
20 product, but I know what Signal is used for.

21 Q And what is it used for?

22 A It's used to -- it's been really popular
23 especially in all of our live business over the last
24 couple of years because there is an option that you
25 can -- it auto deletes messages for private

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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 1st day of October, 2025.



ASHLEY SOEVYN

CSR No. 12019

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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