

July 31, 2025

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively
Conducted on July 31, 2025

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1	P R O C E E D I N G S	10:13:39
2	THE VIDEOGRAPHER: Here begins media	10:13:39
3	number 1 in the videotaped deposition of Blake	10:15:13
4	Lively, in the matter of Lively vs. Wayfarer	10:15:16
5	Studios LLC, et al., in the United States District	10:15:20
6	Court, Southern District of New York, Case Number	10:15:24
7	1:24-cv-10049-LJL.	10:15:31
8	Today's date is July 31st, 2025, and the	10:15:32
9	time on the video monitor is 10:15 A.M.	10:15:35
10	The videographer for today is Enrique	10:15:40
11	Casas, representing Planet Depos. This video	10:15:43
12	deposition is taking place at 787 Seventh Avenue,	10:15:44
13	New York, New York.	10:15:48
14	Would counsel please voice-identify	10:15:48
15	themselves and state who they represent.	10:15:51
16	ATTORNEY HUDSON: Esra Hudson on behalf of	10:15:54
17	Ms. Lively. With me here today is my co-counsel,	10:15:56
18	Michael Gottlieb at -- with Willkie Farr &	10:16:00
19	Gallagher; Stephanie Roeser with Manatt; Lindsey	10:16:03
20	Strasberg with Sloane Offer Weber & Dern; Kristin	10:16:08
21	Bender with Willkie; Michaela Connolly with	10:16:12
22	Willkie; and Aaron Nathan with Willkie.	10:16:16
23	ATTORNEY SHAH: Maaren Shah from Quinn	10:16:20
24	Emanuel Urquhart & Sullivan, on behalf of	10:16:22
25	Jonesworks and Stephanie Jones.	10:16:24

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1	ATTORNEY BABCOCK: Charles Babcock, Chip	10:16:27
2	Babcock, Jackson Walker, on behalf of Jed Wallace	10:16:30
3	and Street Relations.	10:16:35
4	ATTORNEY GLOVER: Joel Glover, also on	10:16:36
5	behalf of Jed Wallace and Street Relations.	10:16:38
6	ATTORNEY FREEDMAN: Bryan Freedman.	10:16:43
7	ATTORNEY BENSON: Summer Benson.	10:16:45
8	ATTORNEY SCHUSTER: Mitchell Schuster.	10:16:46
9	ATTORNEY GAROFALO: Ellyn Garofalo.	10:16:47
10	ATTORNEY AHOURAIAN: Mitra Ahouraian.	10:16:52
11	THE VIDEOGRAPHER: The court reporter	10:16:53
12	today is Anita Baker -- Anita Trombetta	10:16:53
13	representing Planet Depos. Sorry.	10:16:57
14	The witness will now be sworn in.	10:16:59
15	ATTORNEY HUDSON: Counsel, before we get	10:17:11
16	started, can we agree that the standard	10:17:12
17	stipulation under FRCP 32(d)(3)(a) will be applied	10:17:14
18	to this case?	10:17:18
19	ATTORNEY FREEDMAN: We can certainly talk	10:17:18
20	about it during the break.	10:17:20
21	ATTORNEY HUDSON: Well, it's that all	10:17:21
22	objections except to the form of the question are	10:17:22
23	reserved for trial.	10:17:24
24	ATTORNEY FREEDMAN: I understand that.	10:17:26
25	I'm happy to talk about it while we're off the	10:17:27

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1	record.	10:17:29
2	ATTORNEY HUDSON: Well --	10:17:29
3	ATTORNEY FREEDMAN: I don't think it's	10:17:30
4	going to be an issue.	10:17:31
5	ATTORNEY HUDSON: Okay. So we can agree,	10:17:32
6	though, that the rule will apply?	10:17:33
7	ATTORNEY FREEDMAN: We can definitely	10:17:35
8	agree that we can talk about it for sure, but I	10:17:36
9	want to talk to my co-counsel.	10:17:41
10	ATTORNEY HUDSON: That's the rule that	10:17:43
11	I'll be functioning under for the course of the	10:17:44
12	deposition, unless you disagree.	10:17:46
13	ATTORNEY FREEDMAN: Okay.	10:17:48
14	ATTORNEY HUDSON: And then I also wanted	10:17:49
15	to note for the record that per the protective	10:17:50
16	order in this case, ECF number 125, we're	10:17:52
17	designating Ms. Lively's entire deposition	10:17:55
18	transcript and video, including all testimony and	10:17:58
19	exhibits, as confidential.	10:18:01
20	We reserve the right to modify, elevate,	10:18:03
21	or remove this designation within the time period	10:18:06
22	set forth in the protective order.	10:18:09
23	And I also want to just clarify that	10:18:12
24	everyone in the room has signed the protective	10:18:14
25	order.	10:18:16

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1	ATTORNEY SCHUSTER: That's correct.	10:18:18
2	ATTORNEY HUDSON: Okay. Thank you.	10:18:20
3	B L A K E L I V E L Y, called as a witness,	
4	having been first duly sworn by a Notary Public,	
5	was examined and testified as follows:	
6	EXAMINATION BY	
7	ATTORNEY FREEDMAN:	
8	Q Good morning. What's your full legal	10:18:25
9	name?	10:18:27
10	A Blake Ellender Reynolds.	10:18:27
11	Q And what is your date of birth?	10:18:33
12	A 8/25/1987.	10:18:35
13	Q How long have you been an actress?	10:18:39
14	A 21 years.	10:18:42
15	Q Do you recall the year you started?	10:18:48
16	A Professionally, 2004.	10:18:51
17	Q You agreed to play the role of Lily Bloom	10:18:54
18	in It Ends With Us at the end of 2022; is that	10:19:03
19	correct?	10:19:09
20	A Yes.	10:19:09
21	Q Prior to that time, had you heard about	10:19:10
22	the book with the same title?	10:19:13
23	A Prior to agreeing?	10:19:16
24	Q Yes.	10:19:20
25	A Yes.	10:19:21

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1	[REDACTED]	17:22:57
2	[REDACTED]	17:23:00
3	[REDACTED]	17:23:09
4	[REDACTED]	17:23:13
5	[REDACTED]	17:23:20
6	[REDACTED]	17:23:26
7	[REDACTED]	17:23:31
8	[REDACTED]	17:23:39
9	[REDACTED]	17:23:41
10	[REDACTED]	17:23:45
11	[REDACTED]	17:23:52
12	[REDACTED]	17:23:55
13	[REDACTED]	17:23:56
14	Q When did the smear campaign end?	17:24:00
15	ATTORNEY HUDSON: Objection.	17:24:05
16	A It doesn't feel like it's ended.	17:24:06
17	Q It's still ongoing?	17:24:10
18	A It feels that way, yes.	17:24:12
19	Q Who do you believe is involved in the	17:24:14
20	ongoing smear campaign?	17:24:19
21	ATTORNEY HUDSON: Objection to the extent	17:24:22
22	that calls for attorney-client privileged	17:24:23
23	communications.	17:24:25
24	You can answer if you can answer that	17:24:26
25	question without revealing attorney-client	17:24:28

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1	privileged information.	17:24:30
2	A I believe -- outside of what I know	17:24:31
3	through attorneys, I believe that the defendants	17:24:35
4	are involved.	17:24:43
5	Q Which ones?	17:24:44
6	A All of them. And I believe you are.	17:24:50
7	Q And what is the basis for your belief that	17:24:57
8	all of the defendants and myself are involved in	17:25:08
9	an ongoing smear campaign?	17:25:14
10	ATTORNEY HUDSON: Same objection. And I'm	17:25:18
11	having to object with respect to attorney-client	17:25:23
12	privilege. If you can answer that question	17:25:24
13	without revealing attorney-client privileged	17:25:27
14	communications, you can answer.	17:25:29
15	A Outside of what I know through my	17:25:30
16	attorneys, I believe the act of a retaliatory	17:25:32
17	lawsuit and the press that you have done and the	17:25:39
18	statements that you have made about me and my	17:25:50
19	character have felt incredibly retaliatory.	17:25:53
20	Q What about the defendants, what did they	17:26:00
21	do that's part of the ongoing smear campaign?	17:26:12
22	A Like I said, outside of conversations with	17:26:16
23	my attorney, I'm unable to answer that.	17:26:18
24	[REDACTED]	17:26:25
25	[REDACTED]	17:27:01

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1 about some publication, some things that are 18:47:31
2 tangible -- you know, you can read them, and I'm 18:47:35
3 just trying to find out if you're aware of 18:47:37
4 anything that Jed Wallace has published about you 18:47:39
5 that you complain about that would be part of a 18:47:46
6 smear campaign. 18:47:49

7 ATTORNEY HUDSON: Objection. 18:47:50

8 A Sorry, I don't think I understand the 18:47:53
9 question. 18:47:56

10 Q In -- in the law that the thousands of 18:47:56
11 people who are witnessing this deposition practice 18:48:03
12 a lot, there is a thing called libel, which is 18:48:07
13 written defamation disparagement, and then there 18:48:11
14 is a slander, which is oral defamation or 18:48:16
15 disparagement. So I'm focusing on written. 18:48:19

16 Is there anything you've seen in writing 18:48:22
17 that you believe that Mr. Wallace has authored 18:48:24
18 that is defamatory, disparaging or says mean 18:48:28
19 things about you? 18:48:33

20 A That's happening currently? 18:48:36

21 Q Well, let's start with currently, sure. 18:48:37

22 A Currently, I don't read news about me or 18:48:39
23 go on social media about me. So personally, I 18:48:48
24 don't have knowledge, no. 18:48:55

25 Q Okay. And that's as of today. 18:48:57

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1 And going backward in time, can you 18:49:02
2 identify any written thing that you believe 18:49:06
3 Mr. Wallace published about you that is 18:49:09
4 defamatory, disparaging, in any way offending to 18:49:14
5 you? 18:49:18

6 ATTORNEY HUDSON: Objection. 18:49:18

7 A A specific article or -- no, I don't know 18:49:19
8 a specific -- I don't know a specific article. 18:49:29

9 Q Okay. And it could be a post, anything in 18:49:32
10 writing that you can look at it like I'm looking 18:49:34
11 at this screen and reading. 18:49:37

12 And you're not aware of anything that he's 18:49:39
13 authored that you can actually see whether it's a 18:49:41
14 post, an article, or a video or something like 18:49:45
15 that, correct? 18:49:48

16 ATTORNEY HUDSON: Objection. 18:49:48

17 A I can't cite a specific article. I -- my 18:49:49
18 understanding from the documents I received is 18:49:59
19 that he was a part of this campaign which 18:50:03
20 contained a lot of content. But to be able to 18:50:13
21 name one specific article, if that's what you're 18:50:18
22 asking, no. 18:50:21

23 Q Yeah. Okay. 18:50:22

24 And you were right to focus on one 18:50:23
25 specific article, and I also wanted to focus on 18:50:27

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1 one specific author, which would be Mr. Wallace. 18:50:30

2 And are you aware of any specific article 18:50:35

3 that he authored himself, maybe in conjunction 18:50:37

4 with others, but that he authored himself? 18:50:41

5 ATTORNEY HUDSON: Objection. 18:50:44

6 A With his name on it? No. I understand 18:50:45

7 Mr. Wallace's work to be quite clandestine, so I'm 18:50:51

8 not aware of anything that has his name on it, no. 18:51:00

9 Q How do you know his work was quite 18:51:03

10 clandestine? 18:51:06

11 A That's how it's been described to me by 18:51:07

12 everyone who knows him, that -- yeah, that 18:51:13

13 everyone who I've spoken with who knows him. It's 18:51:17

14 also what was described in the documents we 18:51:21

15 received, both in the Joneswork documents, as well 18:51:27

16 as documents in discovery. 18:51:35

17 Q Who described him to you as quite 18:51:36

18 clandestine? You said that people told you that, 18:51:39

19 who told you that? 18:51:43

20 A I don't know that those were the words 18:51:44

21 that were used. 18:51:45

22 Q Sure. 18:51:47

23 A That was the general sort of descriptor, 18:51:48

24 or the general idea. 18:51:52

25 ATTORNEY HUDSON: And you're excluding 18:51:53

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1	ATTORNEY HUDSON: Objection.	19:02:35
2	A No, that's not what I'm saying.	19:02:36
3	Q Okay. I didn't think so. I just wanted	19:02:37
4	to be clear.	19:02:39
5	All right. I just want to get a timeline	19:02:40
6	of things.	19:02:48
7	The production started in early May of	19:02:49
8	2023, is that right, of the movie it ends with us?	19:02:51
9	A The filming itself started, I believe,	19:02:56
10	yeah, in May of 2023.	19:02:58
11	Q Okay. And was that in California?	19:02:59
12	A No, it was in New Jersey.	19:03:04
13	Q Oh, I thought everything was in	19:03:09
14	California.	19:03:10
15	Okay. And then there was a writers'	19:03:11
16	strike that stopped it in June of '23 -- 2023,	19:03:16
17	correct?	19:03:24
18	A Correct.	19:03:25
19	Q And then production resumed maybe on	19:03:26
20	January 5th of 2024; is that right?	19:03:33
21	A That sounds correct.	19:03:35
22	Q Okay. Was that also in New Jersey or was	19:03:36
23	that in California?	19:03:38
24	A That was in New Jersey. We shot a couple	19:03:39
25	days in California at the end.	19:03:42

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1	Q Okay. Was the movie shot anywhere other	19:03:46
2	than New Jersey or California?	19:03:49
3	A I believe they did additional photography	19:03:52
4	and wide shots and inserts -- not inserts, but	19:03:58
5	wider shots of scenery in other locations.	19:04:06
6	Q Do you know where those other locations	19:04:09
7	were?	19:04:12
8	A I don't.	19:04:13
9	Q You weren't involved in them; they just	19:04:13
10	shot them other places?	19:04:16
11	A Yes.	19:04:17
12	Q Okay. Great.	19:04:17
13	ATTORNEY BABCOCK: Joel, I need 1055.	19:04:21
14	(Exhibit 1055, marked for identification.)	19:04:21
15	BY ATTORNEY BABCOCK:	19:04:21
16	Q Last night, we received a second amended	19:04:27
17	complaint, and it's a big thick old thing, and I'm	19:04:31
18	not -- and what I've done is to redline the	19:04:36
19	changes. So it's not how it was filed. It's just	19:04:42
20	how -- how it looks now.	19:04:47
21	And I have a couple of questions about it,	19:04:49
22	not a whole lot, but if -- if you'll turn to	19:05:00
23	paragraph 332, which you'll find on page 118, the	19:05:05
24	second amended complaint, which this is -- have	19:05:13
25	you ever seen it before, by the way?	19:05:17

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1	Q What is astroturfing?	19:09:45
2	A My understanding of astroturfing is when a	19:09:49
3	conversation or sentiment is inorganic. And	19:10:00
4	unlike a grassroots marketing campaign, it is fake	19:10:09
5	in that it is a sentiment that is where there is a	19:10:17
6	particular person, group, or organization behind	19:10:24
7	it.	19:10:27
8	Q Okay. And you say in this complaint that	19:10:27
9	the "coordinated astroturfing campaign to	19:10:37
10	discredit and bury Ms. Lively."	19:10:42
11	What do you mean by bury you, the	19:10:46
12	astroturfing campaign was meant to bury you?	19:10:49
13	ATTORNEY HUDSON: Objection.	19:10:52
14	Q Do you know what that means, what is meant	19:10:52
15	by that?	19:10:54
16	ATTORNEY HUDSON: Objection.	19:10:55
17	A I do.	19:10:56
18	Q And what is meant by that?	19:10:56
19	A They were descriptives that were used by	19:10:58
20	Justin Baldoni, Jennifer Abel, and Melissa Nathan.	19:11:05
21	The term "bury," she wants -- he wants to feel	19:11:08
22	like she can be buried.	19:11:10
23	Q Okay. And --	19:11:10
24	A And Melissa Nathan said, "We can bury	19:11:14
25	her."	19:11:16

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1	Q Okay.	19:11:16
2	A So that's why that word was chosen.	19:11:17
3	Q This is going to seem like a facetious or	19:11:19
4	silly question, but you didn't take that to mean	19:11:22
5	they were going to physically bury you, just they	19:11:27
6	were going to reputationally bury you? Is that	19:11:29
7	how you took it or not?	19:11:32
8	A When they said that, I felt	19:11:33
9	reputationally.	19:11:39
10	When Steve Sarowitz said that there would	19:11:39
11	be two dead bodies by the time that he was done	19:11:42
12	with us, yeah, I considered that that might be	19:11:45
13	literal.	19:11:48
14	Q You thought you might -- you might be in	19:11:49
15	physical jeopardy?	19:11:51
16	A You -- as a mother, you feel like anything	19:11:53
17	is -- could be possible in those moments. It's	19:12:00
18	terrifying.	19:12:06
19	Q Yeah. Putting aside the physical	19:12:07
20	jeopardy, was -- was the reference to burying and	19:12:12
21	two dead bodies inclusive of reputational injury	19:12:18
22	or not?	19:12:22
23	ATTORNEY HUDSON: Objection.	19:12:23
24	A I'm sorry, I don't understand the	19:12:23
25	question.	19:12:25

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1 When Mr. Freedman allegedly made these 19:21:17
2 defamatory comments on behalf of Mr. Wallace, did 19:21:20
3 he make them prior to the lawsuit -- to that 19:21:25
4 lawsuit, which has now been dismissed, being sent 19:21:29
5 to New York? 19:21:32

6 ATTORNEY HUDSON: Objection. 19:21:32

7 Q How about that? 19:21:33

8 ATTORNEY HUDSON: Objection. 19:21:36

9 A My understanding is that Mr. Freedman's 19:21:37
10 harmful statements started as soon as the first 19:21:45
11 case started, which would be mine. So December of 19:21:55
12 2024. 19:22:01

13 Q Okay. The premiere of it ends with us, 19:22:01
14 the film, was on August 6th of 2024; is that 19:22:16
15 right? 19:22:22

16 A I don't know the exact date, but that 19:22:22
17 sounds correct. 19:22:24

18 Q Okay. 19:22:25

19 ATTORNEY BABCOCK: Have you got 1051? 19:22:27

20 I may have a document that might help. 19:22:29

21 THE WITNESS: Thanks. 19:22:32

22 ATTORNEY BABCOCK: You can -- attach that 19:22:34
23 one. 19:22:38

24 (Exhibit 1051, marked for identification.) 19:22:38

25 BY ATTORNEY BABCOCK: 19:22:57

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1 Q 1051, if you go to the fourth page, next 19:22:57
2 to last page, it says, "Tuesday, August 6th, 19:23:06
3 7:00 P.M., it ends with us premiere, location AMC 19:23:12
4 Lincoln Square, 1998 Broadway, New York, 19:23:16
5 New York." 19:23:20

6 Does that refresh your recollection as to 19:23:20
7 when the premiere was? 19:23:23

8 A Sorry, I wasn't there yet. 19:23:24

9 This is 8981? Tuesday, August 6th, it 19:23:26
10 ends with us premiere. Yes. 19:23:33

11 Q Okay. And the -- the film's release was 19:23:35
12 on August 9th; is that right? 19:23:43

13 A In the United States, yes. It released at 19:23:45
14 different times in different international 19:23:51
15 territories. But for the sake of our 19:23:52
16 conversations today, when I've talked about the 19:23:55
17 day the film was released, I was talking about 19:23:59
18 August 9th. 19:24:01

19 Q Okay. And you testified earlier that that 19:24:02
20 was when you first became aware of the negative 19:24:03
21 argument or the -- sorry, the negative article 19:24:07
22 about you, right? 19:24:12

23 ATTORNEY HUDSON: Objection. 19:24:13

24 A Not an article, no. It felt -- no, not 19:24:13
25 one article. 19:24:22