October 6, 2025

	Page 42
1	an understanding of why they've been promised ghost
2	equity or some sort of promise of equity in
3	Wayfarer?
4	A I believe so.
5	Q Can you tell me?
6	A I will start with Ahmed. Ahmed was my
7	former partner at Wayfarer Entertainment, which was
8	a small production company that I had started years
9	ago, and he's an independent producer now. But I
10	didn't feel like I could have started Wayfarer
11	without his help with Wayfarer Entertainment so I
12	gave him a small piece of my own equity.
13	Jamey Heath took a low salary compared,
14	probably, to a lot of other folks and has lived and
15	breathed the company. And Steve and I felt he
16	deserved a small piece of equity.
17	And I'm still unsure if Tera Hanks
18	officially has any or that any was promised. But
19	when she joined, I think it was discussed. But I
20	don't have a full memory of it.
21	Q Would you say it's accurate that you and
22	Steve Sarowitz co-founded Wayfarer Studios?
23	A Yeah, I think so.
24	Q When did that happen?
25	A I believe officially, it was around the

Page 43
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

	Page 46
1	A I don't know. And I don't know how I
2	we would quantify that. I don't believe so.
3	Q Are you the co-chairman of Wayfarer
4	Studios?
5	A I am.
6	Q Do you hold any other titles with respect
7	to Wayfarer Studios?
8	A I do not.
9	Q And what are your responsibilities as
10	co-chairman of Wayfarer Studios?
11	A Mostly thinking of the future direction
12	of where I would like to see the company going. I
13	assist with creative. That's that's pretty much
14	it.
15	Q Do you have any responsibilities with
16	respect to the financials of Wayfarer Studios?
17	A No.
18	Q Do you have any responsibilities with
19	respect to the day-to-day operation of Wayfarer
20	Studios?
21	A No.
22	Q Would you say that Sarowitz is the money
23	guy and you're the creative force behind Wayfarer
24	Studios?
25	A Sarowitz is quite creative, but I think

	Page 51
1	A I can't think of any right now.
2	Q In any other role than an attendee?
3	A I started speaking in my 30s, and I don't
4	know if I ever spoke at one or not.
5	Q Do you know a gentleman by the name of
6	Labid Aziz?
7	A Yes.
8	Q Who is he?
9	A Labid?
10	Q Yes.
11	A was the original COO of Wayfarer
12	Studios.
13	Q And when did he cease operating in that
14	role?
15	A I think about a year into his role.
16	Q Was he a good COO?
17	A I'm not sure I'm qualified to judge what
18	a good COO is.
19	Q Did you ever have any concerns personally
20	with him in his role as COO?
21	A I did.
22	Q What were those concerns?
23	A I felt he would often promise things in
24	dealmaking that weren't possible. He was a bit of a
25	wheeler and a dealer, and there were certain

Page 52 1 instances where I did not feel he was telling the 2 truth. 3 Can you identify any of those incidents for me? 4 5 I just remember getting phone calls saying, like, Labid said this or Labid promised this 6 7 and being very confused because that wasn't 8 something that he could be promising. It was 9 important to me that we were always honest and that 10 we didn't enter into deals with people and make 11 promises that we couldn't keep. And I didn't always 12 feel that that integrity was -- was -- didn't always 13 feel he operated with that -- that integrity. 14 Can you give me any specific examples? 15 The one I can think of right now is my 16 dad is also in the entertainment business. 17 one of the founding fathers of what is called 18 product placement. And I always wanted to work with 19 my dad, and it's a sweet relationship. 20 remember my dad told me that he had promised Labid 21 -- or Labid had promised him that he could build out 22 an entire product placement division of Wayfarer 23 Studios and that he would put him on a salary. 24 And -- and I think he got my dad's hopes up, which 25 my dad, you know, was 70, and that wasn't ever part

	Page 54
1	BY MS. SHAH:
2	Q I want to come back to the your use of
3	Signal.
4	A Uh-huh.
5	Q I think you testified earlier this
6	morning that you had never used Signal before
7	Blake's complaint was filed in December of 2024.
8	Am I getting that correct?
9	A I had the app, but I wasn't a
10	participant, like, doing anything on the app.
11	Q Do you recall when you downloaded the
12	app?
13	A I recall two different times that I had
14	downloaded the app. The first time I ever heard of
15	Signal was from Stephanie Jones. And I don't know
16	how long ago that was. I feel like that was I
17	close my eyes sometimes because I visualize so I
18	understand where I am. I believe it was in 20 I
19	think it was around 2020.
20	She had told me that was her preferred
21	method of communication, but we never communicated
22	on Signal. And then and then I think your phone
23	just gets rid of it when you don't use it. And then
24	I downloaded it again. I joined a men's group and
25	they had their group on Signal. But then I was

	Page 55
1	unable to join officially the men's group so I never
2	joined that group on Signal. And then so it was
3	just kind of an app that was there.
4	And then I downloaded it probably the day
5	after or two days after the New York Times article
6	and the lawsuit.
7	Q When you downloaded it a day or two after
8	the New York Times article and the lawsuit, why did
9	you do that?
10	A I believe it was a group decision to move
11	all of our chats to Signal.
12	Q Who was in that group that made that
13	group decision?
14	A My attorneys. I believe all the
15	defendants here.
16	Q Melissa Nathan?
17	A Yes.
18	Q Jen Abel?
19	A Yes.
20	Q Jamey Heath?
21	A Yes.
22	Q Steve Sarowitz?
23	A I think he eventually joined, yes.
24	Q But not at first?
25	A Steve is always in his own world.

	Page 73
1	you explain the truth of what happened?
2	A If my memory is correct, I was being
3	accused of many things. But one of them was, like,
4	putting Ms. Lively on a phone call with a dietitian,
5	which was a lie and an extreme distortion of the
6	truth.
7	Q Who is Dan [sic] Saladino?
8	A He's a personal trainer.
9	Q Is he Ms. Lively's personal trainer?
10	A I would assume so.
11	Q And what about your text messages with
12	him did you believe at the time would help you
13	demonstrate the truth of what had happened?
14	A The communication between him and myself
15	that showed that he was also working with me.
16	Q How many screenshots do you recall
17	sending to Mitz?
18	A I wish I could tell you. I don't know.
19	Q More than two?
20	A Yeah.
21	Q More than five?
22	A Probably.
23	Q More than ten?
24	A That was a very hard time. I will say
25	yes.

	Page <mark>136</mark>
1	time. But I believe he thought she was very good at
2	her job.
3	Q Do you know what led him to believe that?
4	A I don't.
5	Q Did you have any personal role in making
6	the decision to hire Melissa Nathan over any of the
7	other crisis PRs that may have been recommended?
8	A No.
9	Q Are you aware of where Jamey got the
10	names for potential crisis communications
11	professionals that he was considering?
12	A I imagine from
13	MS. SHAPIRO: Mr. Baldoni, don't
14	speculate.
15	THE WITNESS: No. I actually don't.
16	BY MS. SHAH:
17	Q You don't know?
18	A No.
19	Q Do you know if he or anyone else at
20	Wayfarer asked Stephanie Jones for her views on
21	crisis communications professionals that you should
22	hire?
23	A I don't.
24	Q Do you know if she recommended
25	Melissa Nathan or not?

	Page 137
1	A If Stephanie Jones recommended? I now
2	know that she didn't.
3	Q How did you come to that understanding?
4	MS. SHAPIRO: Mr. Baldoni, don't answer
5	
6	THE WITNESS: No
7	MS. SHAPIRO: if the information came
8	from your lawyers.
9	THE WITNESS: Yes, I can answer this.
10	Stephanie had sent me a text about Melissa Nathan.
11	BY MS. SHAH:
12	Q You knew at the time that Stephanie did
13	not recommend that you hire Melissa Nathan, correct?
14	MS. SHAPIRO: Objection.
15	THE WITNESS: I knew that Stephanie did
16	not like Melissa Nathan, yes.
17	BY MS. SHAH:
18	Q And Stephanie warned you against hiring
19	Melissa Nathan; isn't that right?
20	A You could I think you could put it
21	that way with my interaction with Stephanie. Yeah.
22	Q And were you aware that Stephanie also
23	warned Jamey Heath and Tera Hanks against hiring
24	Melissa Nathan?
25	A I was only aware of what she texted me.

Page 138
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

	Page <mark>139</mark>
1	with you?
2	MS. SHAPIRO: Objection.
3	THE WITNESS: What do you mean by
4	"credence" exactly?
5	BY MS. SHAH:
6	Q Did you take her concerns seriously?
7	A I believe I did.
8	Q Did you do anything to investigate them
9	further before you hired Melissa Nathan?
10	A I didn't have any capacity at that time
11	to do personal investigation, no.
12	Q Did you relay Stephanie's concerns to
13	Jamey Heath or Tera Hanks at the time?
14	A I believe I did. Yes.
15	Q Tell me what you recall about the
16	substance of those conversations or communications.
17	A I remember passing along that Stephanie
18	doesn't like I didn't know who Melissa Nathan
19	was one of the people. That's what I remember.
20	Q Do you remember Stephanie Jones telling
21	you in sum or substance that Melissa Nathan and the
22	tactics she uses as a crisis communications
23	professional are not the kinds of tactics that you
24	want to publicly associate yourself with?
25	A That sounds very familiar.

	Page <mark>140</mark>
1	Q Are you aware that Wayfarer and you
2	decided to hire Melissa Nathan over Stephanie Jones'
3	objections?
4	A I would imagine so, yes.
5	MS. SHAH: Okay. I'm going to show you
6	what's marked as a document, Exhibit 5.
7	(Exhibit 5 marked for identification.)
8	BY MS. SHAH:
9	Q It's a text message between you and
10	Stephanie Jones dated July 26, 2024, Bates stamped
11	Jonesworks_, several zeroes, 39735.
12	Is this the text message that you were
13	referring to that Stephanie Jones sent you where she
14	warned you against hiring Melissa Nathan?
15	A It appears to be.
16	Q And this was sent on July 26th, 2024.
17	So does this refresh your recollection that you were
18	considering bringing on crisis PR before
19	July 26th, 2024?
20	A Yes.
21	Q Okay. And as you recall, Stephanie Jones
22	sent you a link at the top of the text thread,
23	right?
24	A Yes.
25	Q You said you never clicked on that; is

	Page 145
1	THE WITNESS: I don't know, no. I don't
2	know.
3	BY MS. SHAH:
4	Q Because you never asked her what she
5	meant by that?
6	MS. SHAPIRO: Objection.
7	THE WITNESS: Unless you have a document
8	that says I did, I don't feel like I did.
9	MS. SHAH: Okay. I'm going to show you a
10	document that's been marked Exhibit 6.
11	(Exhibit 6 marked for identification.)
12	THE WITNESS: You got it.
13	BY MS. SHAH:
14	Q It's a text message between
15	Stephanie Jones, Jamey Heath, Tera Hanks, and you
16	A Uh-huh.
17	Q dated July 26th, Bates stamped
18	Jonesworks_JB_, several zeroes, 1142.
19	Do you see this?
20	A Yes.
21	Q Okay. Do you recall this text message
22	when you received it?
23	A Vaguely, yes.
24	Q Okay. And in this text message,
25	Stephanie Jones warns you, Tera Hanks, and

	Page <mark>146</mark>
1	Jamey Heath that you should not work with
2	Melissa Nathan because "there's a lot of dirty work
3	she has done" and "it's not someone that you should
4	want in Justin's orb."
5	Do you see that?
6	A Yes.
7	Q Okay. And she goes on to say:
8	(As read):
9	"Or for Blake's PR to use as a weapon
10	against him."
11	Do you see that?
12	A I do.
13	Q Did you ever have a conversation with her
14	about what she meant by that?
15	A I did not have a conversation with
16	Stephanie at all around this.
17	Q Okay. Do you have any understanding,
18	whether from this text message or anything else that
19	you knew at the time, about what she meant when she
20	said, "I just downloaded Tera on some dark stuff"?
21	A I don't.
22	Q Did Tera ever relay the substance of that
23	conversation to you?
24	A I think I had had a conversation with
25	Tera and Jamey that I didn't want to be a part of

	Page <mark>147</mark>
1	any of this. So I trusted them to make the
2	decision. I don't believe she told me anything.
3	Q Okay. Do you understand from this text
4	message that Stephanie is telling you and Jamey and
5	Tera that it might not be good for you to be
6	associated with someone like Melissa Nathan based on
7	the type of tactics that she has used in the past?
8	A That seems to be an accurate summary.
9	Q And that if people knew that you were
10	associated with Melissa Nathan or specifically if
11	Blake's PR came to find out that you had associated
12	yourself with Melissa Nathan, they could use that
13	against you because of who Melissa Nathan was,
14	right?
15	MS. SHAPIRO: Objection. Objection.
16	THE WITNESS: I can't speculate to what
17	she meant by that. But it seems to be she says
18	"Blake's PR to use as a weapon" so
19	BY MS. SHAH:
20	Q Okay. Now, Wayfarer and you
21	A are you done with this one?
22	Q I think so.
23	A Here you go.
24	Q Wayfarer and you went ahead and hired
25	Melissa Nathan after and despite Stephanie Jones's

	Page 148
1	warnings, right?
2	MS. SHAPIRO: Objection.
3	THE WITNESS: I believe so.
4	BY MS. SHAH:
5	Q And there came a time in August, after
6	you had hired Melissa Nathan, that The Hollywood
7	Reporter published an article about the fact that
8	you had hired Melissa Nathan, right?
9	A Yes.
10	Q I'm going to show you that article.
11	MS. SHAH: It's a document we're going to
12	mark as Exhibit 7.
13	(Exhibit 7 marked for identification.)
14	THE WITNESS: Thank you.
15	BY MS. SHAH:
16	Q It's an article from The Hollywood
17	Reporter, dated August 14th, 2024, that says
18	"Justin Baldoni Hires Crisis PR Veteran Amid
19	It Ends with Us Rift."
20	Do you see that?
21	A Uh-huh.
22	Q And it goes on to say:
23	(As read):
24	"The director and star has retained the
25	services of Melissa Nathan who

	Page <mark>149</mark>
1	represented Johnny Depp during the
2	Amber Heard trial."
3	Do you see that?
4	A Excuse me. On the second page, yes.
5	Q Okay. You were pretty upset when this
6	article came out, right?
7	A I don't remember what I was feeling.
8	Q You were worried when this article came
9	out that being publicly associated with
10	Melissa Nathan might make it look like you had
11	something to be guilty for, right?
12	MS. SHAPIRO: Objection.
13	THE WITNESS: No, I think I think I
14	was just not happy that my crisis PR was being
15	publicized. I don't think it had anything to do
16	with Nathan Melissa Nathan.
17	BY MS. SHAH:
18	Q Why were you not happy that your crisis
19	PR was publicized?
20	A Because it felt like more of the kind
21	of the kind of thing that felt like somebody
22	would plant to draw more attention and fan a flame
23	to something.
24	Q Fan a flame to what?
25	A To public speculation, the fan theories

	Page <mark>150</mark>
1	of why I wasn't doing press with anybody and
2	Q What were the fan theories at the time
3	about why you weren't doing press with anyone?
4	A I remember there being a lot of talk
5	about all of the cast unfollowing me, why I wasn't
6	doing press with any of the other cast members. I
7	don't remember the date that this came out, but I
8	don't know if I had already done the premiere or not
9	at this point. But I had also never read an article
10	or seen an article about somebody hiring crisis PR,
11	so I found it odd.
12	Q And you thought it made you look bad,
13	right?
14	A Yeah, I think I did.
15	Q You thought it made you look like you had
16	something to hide?
17	A I think I had never been involved in
18	anything like this, and I wasn't used to seeing my
19	name in the press in this way at all. And I
20	certainly I certainly didn't want my my name
21	out there in a negative way.
22	Q You thought it made it look like you had
23	something to hide that had to do with the
24	allegations of on-set abuse, right?
25	MS. SHAPIRO: Objection.

	Page <mark>226</mark>
1	BY MS. SHAH:
2	Q Which part do you not agree with?
3	A Can you ask me again?
4	Q You left Jonesworks to go with
5	Jennifer Abel as a publicist after Jennifer Abel was
6	fired from Jonesworks, right?
7	MS. SHAPIRO: Objection.
8	THE WITNESS: I don't know the the
9	sequence. I I know that Jennifer had put in her
10	notice, so I'm I'm confused by the way the
11	question is asked.
12	BY MS. SHAH:
13	Q Let me ask it a different way.
14	You left Jonesworks to go with
15	Jennifer Abel as a publicist after she left
16	Jonesworks, right?
17	MS. SHAPIRO: Objection.
18	THE WITNESS: Yeah. Yes.
19	BY MS. SHAH:
20	Q Why?
21	A Because she was my publicist for years
22	before, and I I trusted her.
23	Q Do you still trust her?
24	MS. SHAPIRO: Objection.
25	THE WITNESS: I do.

	Page <mark>227</mark>
1	BY MS. SHAH:
2	Q Okay. Have you seen any documents or
3	text messages in this case, or otherwise, where
4	Stephanie Jones is talking shit about you the way
5	Jen Abel was?
6	A I haven't seen any documents about
7	Stephanie Jones in general to my knowledge.
8	Q Okay.
9	A Are we done with this one?
10	Q Yes.
11	A Okay.
12	Q Are you aware that after Wayfarer
13	onboarded TAG as its crisis publicist, Katie Case
14	and Melissa Nathan were joking about whether your
15	faith was a cult?
16	MS. SHAPIRO: Objection.
17	THE WITNESS: I was not aware.
18	BY MS. SHAH:
19	Q What do you think about that?
20	MS. SHAPIRO: Objection.
21	THE WITNESS: Well, I think anytime
22	somebody makes a religious joke, I think that's not
23	okay. It seems to have happened a lot in this case.
24	BY MS. SHAH:
25	Q Including from your own publicist, it

	Page <mark>228</mark>
1	seems.
2	MS. SHAPIRO: Objection.
3	THE WITNESS: If you want to show it to
4	me, I'd be happy to see it. I haven't heard
5	anything. This is the first I'm hearing about it.
6	BY MS. SHAH:
7	Q Sure.
8	MS. SHAH: Tab 139, please.
9	I will show you a document that's marked
10	as exhibit?
11	THE STENOGRAPHIC REPORTER: Thirteen.
12	MS. SHAH: Thirteen.
13	(Exhibit 13 marked for identification.)
14	BY MS. SHAH:
15	Q It's a text thread between Katie Case and
16	Melissa Nathan from August 4th, 2024 with the Bates
17	stamp NATHAN, several zeroes, 2938.
18	A Okay. Sorry, there is one more page.
19	Q Have you seen this before?
20	A I have not.
21	Q Were you aware that Katie Case and
22	Melissa Nathan were texting things like this about
23	you while they were on a call with you?
24	MS. SHAPIRO: Objection.
25	THE WITNESS: I was not.

	Page 278
1	(Exhibit 18 marked for identification.)
2	BY MS. SHAH:
3	Q Is this the idea from your partner,
4	Steve Sarowitz, about flipping the narrative that
5	you were just testifying discussing flipping the
6	narrative about?
7	A Can I have a second to read it, please.
8	Q Of course.
9	A Okay.
10	Q So is this the substance of the idea that
11	you were just talking about that came from your
12	partner, Steve Sarowitz, about flipping the script?
13	A Yes.
14	Q And that included flipping the script
15	from Ryan saying:
16	(As read):
17	"Script was a disaster and he saved the
18	movie, to something about Ryan claiming
19	the female hired was a feminist writer,
20	didn't know how to tackle a female film
21	etc."
22	Do you see that?
23	A Yes.
24	Q This idea that this was a female writer
25	and a female film and that what Ryan Reynolds was

	Page 279
1	saying was essentially misogynistic, did that come
2	from Steve Sarowitz?
3	MS. SHAPIRO: Objection.
4	THE WITNESS: I think I said here that my
5	partner, Steve, has asked about this. So I was
6	passing that along.
7	BY MS. SHAH:
8	Q So this idea, something about Ryan
9	claiming the female hired was a feminist writer,
10	didn't know how to tackle a female film, etc., came
11	from Steve?
12	A That was what was passed on to me.
13	Q Did you use any judgment about whether or
14	not that was a good idea before you passed it along?
15	MS. SHAPIRO: Objection.
16	THE WITNESS: I think it's implied in him
17	saying the script was a disaster, so I just pass it
18	along. I didn't disagree with him.
19	BY MS. SHAH:
20	Q You didn't disagree with Mr. Sarowitz's
21	idea? Is that what you mean?
22	A I didn't disagree with what Mr. Sarowitz
23	was was saying in terms of what Ryan was
24	inferring when he called the script a disaster.
25	Q Meaning, that Ryan was essentially acting

Page 296
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

Page 297

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?

	Page 302			
1	myself.			
2	Q And can you describe that journey for me			
3	briefly here?			
4	A Do you want me to describe my whole book			
5	journey briefly?			
6	Q Is it possible?			
7	A I'm happy to try. I just don't know what			
8	"briefly" is.			
9	Q I'm just trying to understand, what was			
10	the idea behind that book and the podcast?			
11	A Well, the book was really a			
12	self-exploration of looking at all the unconscious			
13	messages that I've taken on as a man but, more			
14	importantly, as human in my life all the mistakes			
15	I've made, the social constructs and kind of			
16	invisible scripts that I maybe have been living by			
17	that I wasn't even aware of and putting them in a			
18	form that I was hopeful could help other men.			
19	And the podcast, I think was to answer			
20	your question was a way to have a conversation			
21	around those same topics that, oftentimes, were			
22	uncomfortable so that we could have something for			
23	men outside of outside of the book.			
24	Q Did the book or the podcast deal with			
25	notions of toxic masculinity? Was that part of it?			

Page 303

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?

"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

Page 304 But generally, those were people that didn't read my book or listen to the podcast. 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. What are some --0 I'm sorry. That wasn't very brief. Α 0 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 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? I mean, a lot of men deal with A lot of men -- I mean, suicide among men is

increasing yearly, and many more men take their own

1

2

3

4

5

6

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

Page 305

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

Page 306

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

Page 307
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?

October 7, 2025

	Page 20		
1	interview with Glamour magazine; is that right?		
2	A I don't know which magazine it was. I		
3	remember talking about it only once, and it was		
4	right after a speech that I gave.		
5	Q Okay. After that TED talk that you gave?		
6	A Yes, at TEDWomen.		
7	Q Do you recall being asked the question		
8	prompting that answer: Did you ever feel like you		
9	were harassed or victimized on set?		
10	A I don't remember that.		
11	Q Okay. But as you sit here today, this is		
12	the first example that you have brought up in		
13	response to my question of whether you've ever been		
14	sexually harassed?		
15	A That's the first response that I think		
16	you asked me if I've talked about it publicly.		
17	Q Okay.		
18	A Yeah.		
19	Q Why did you feel harassed by what this		
20	producer did?		
21	A Well, he was asking me to get naked in		
22	the hot tub with him and standing very close to me		
23	with his naked genitals, like intentionally walking		
24	close to my face. It was just him and I in there.		
25	And he was using like, he was using the idea that		

		CONTIDENTIAL	
		Page 22	
1	A	No.	
2	Q	So he didn't assault you?	
3	A	I wouldn't call it assault. I don't	
4	believe I	characterized it as assault.	
5	Q	I didn't say you did, sir.	
6	A	Yeah.	
7	Q	You were bigger and stronger than this	
8	guy, right?		
9	A	I would imagine I was.	
10	Q	This wasn't someone the size of Dwayne	
11	Johnson or	The Rock or something like that?	
12	A	It was not.	
13	Q	So if it had come to it, you probably	
14	could have	knocked the guy out?	
15		MS. SHAPIRO: Objection.	
16		THE WITNESS: I'm not much of a fighter.	
17	I would have left.		
18	BY MR. GOT	TLIEB:	
19	Q	You didn't work for the guy, right?	
20	A	No.	
21	Q	So you had no employment relationship	
22	with him?		
23	A	No, I didn't.	
24	Q	Okay. Did you do you know who he was?	
25	A	I think he told me his name. But	

	Page 23
1	Q Did you try and find him after the
2	incident and talk to him about it?
3	A No.
4	Q Did you find him before you talked about
5	this event in Glamour magazine?
6	MS. SHAPIRO: Objection.
7	THE WITNESS: No.
8	BY MR. GOTTLIEB:
9	Q You didn't want to give him an
10	opportunity to take accountability for his actions
11	and make it right?
12	A I didn't name him.
13	Q But you described him and described who
14	he was friends with and the spa you were in?
15	MS. SHAPIRO: Objection.
16	THE WITNESS: I don't know if I described
17	who his friends were.
18	BY MR. GOTTLIEB:
19	Q Do you know his name as you sit here
20	today?
21	A No.
22	Q I think you've already talked about your
23	experience with your college girlfriend; is that
24	right?
25	A Yes.

	Page 27
1	THE WITNESS: No.
2	BY MR. GOTTLIEB:
3	Q Did you ever go back to talk to any of
4	your college friends or people that you might have
5	hung out with mutually to tell them what you were
6	going to do?
7	A I don't know anybody from back then.
8	Q Do you have any idea whether or not your
9	college girlfriend would agree with the way you have
10	remembered the events relating to the losing of your
11	virginity?
12	MS. SHAPIRO: Objection.
13	THE WITNESS: I don't know what she would
14	think. I don't know who she is anymore.
15	BY MR. GOTTLIEB:
16	Q But you thought it was okay to go on TV
17	and tell the world that your college girlfriend had
18	sexually abused you without ever talking to her
19	about it?
20	MS. SHAPIRO: Objection.
21	THE WITNESS: I wasn't aware I needed to
22	ask her permission to share my story.
23	BY MR. GOTTLIEB:
24	Q Am I right that one of the things that
25	was most traumatic about this to you is that you

	CONTINE
	Page 34
1	A A set with all Baha'i's? I don't know.
2	Q Well, so you're the director, and you're
3	the co-founder of the studio. And I'm here and I'm
4	asking you, okay?
5	A Yeah. Yeah.
6	Q Okay. Someone has told me that your set
7	is a Baha'i set. Okay?
8	A Are you sorry. Are you giving me a
9	MS. SHAPIRO: Objection.
10	BY MR. GOTTLIEB:
11	Q Just let me finish my question.
12	A Okay.
13	Q So let's establish some principles.
14	You're the cofounder of Wayfarer Studios, correct?
15	A Correct.
16	Q You were the director of It Ends with Us,
17	correct?
18	A Correct.
19	Q Producer?
20	A No.
21	Q Lead actor?
22	A Second lead actor.
23	Q Second lead actor. And I come to you now
24	and I say, Mr. Baldoni, you're the director of this
25	film, you're the cofounder of this studio. Someone

	Page 52
1	A The policy that is directly in front of
2	me, I don't know if I have read this policy.
3	Q Okay. So do you know if you've ever had
4	any kind of training on this policy, this
5	anti-discrimination, anti-harassment, and
6	anti-retaliation policy?
7	A Yes, I believe I have.
8	Q When was that?
9	A I think every couple years.
10	Q When was the last time you attended one?
11	A In person?
12	Q At all. Virtually or in person?
13	A Virtually virtually, I completed mine
14	last week
15	Q Okay.
16	A for this year.
17	Q For the year 2025?
18	A Yes.
19	Q Prior to that, do you recall the last
20	time you had training on this policy?
21	A I imagine it was two years before that.
22	Q Do you recall there ever being a training
23	on anti-discrimination, anti-harassment and
24	anti-retaliation during the production of
25	It Ends with Us?

		Page 53
1	A	Yes.
2	Q	Did you attend that training?
3	A	I did.
4	Q	Did you attend that training in person?
5	A	Yes.
6	Q	Where was it?
7	A	In our production offices.
8	Q	On the set in New Jersey?
9	A	Not a set, but the production offices in
10	New Jersey	
11	Q	Okay. The production offices in New
12	Jersey near	where the strike that.
13	A	Yeah
14	Q	Strike that.
15	A	All right.
16	Q	It's a bad question.
17		Okay. We'll come back to that.
18		During that training, do you remember
19	going throu	igh examples or scenarios of types of
20	conduct tha	at would be a violation or a potential
21	violation o	of this anti-discrimination,
22	anti-harass	sment, and anti-retaliation policy?
23	A	I can't remember specifics, but I do
24	that was th	ne the bulk of the harassment training.
25	Q	Was there a presentation?

	Page 77
1	BY MR. GOTTLIEB:
2	Q Okay. I'm most interested in what you
3	said publicly about how in your view being exposed
4	to pornography repetitively affects one's view of
5	consent. Do you recall giving a talk called "Boys
6	Will Be Human: A Talk on Healthy Masculinity with
7	Justin Baldoni"?
8	A I wrote a book called Boys Will Be Human,
9	and I imagine I've done a talk or two, yeah.
10	Q Some interviews about the subject of the
11	book?
12	A Is this a speech that I gave or is this
13	an interview that I gave?
14	Q This is during an interview, and I want
15	to read you what you said. You said:
16	(As read):
17	"When you hit 11 or 12-years-old and
18	your friends have a phone and maybe you
19	don't and you're being shown things for
20	the first time and then you start to
21	think, that is what women want, and in
22	porn, as we know, no means yes or try
23	harder. It starts to become very
24	confusing, which is definitely
25	something that happened to me."

	Page 79
1	consent. But what I'm essentially saying is,
2	there's even a possibility that in my teens and 20s,
3	I wasn't aware.
4	Q Well, literally what you said is:
5	(As read):
6	"I'm sure I have crossed boundaries and
7	lines in my teens and 20s not even
8	thinking about it simply because of the
9	porn I was consuming."
10	So that's what you said. And my question
11	to you is: Do I understand your testimony to be
12	that you were essentially making that up in order to
13	make other men feel that you were relatable to them?
14	MS. SHAPIRO: Objection.
15	THE WITNESS: No. I'm sure I had crossed
16	boundaries in my teens and 20s. I'm sure I have.
17	BY MR. GOTTLIEB:
18	Q And do you think that was because of the
19	exposure that you had to this kind of toxic
20	pornography?
21	A I'm sure that that was a part of it. It
22	was also a different time and part of why I wrote
23	the book, was that consent wasn't taught to boys.
24	And I wanted to make sure that we taught consent to
25	boys and men.

	Page 116
1	Q Okay. You hugged Ms. Lively on multiple
2	occasions on the set, right?
3	A Yes.
4	Q Every day?
5	MS. SHAPIRO: Objection.
6	THE WITNESS: No.
7	BY MR. GOTTLIEB:
8	Q How many times would you estimate?
9	A That I hugged Ms. Lively?
10	Q On the set. So not outside of the set
11	environment, but at work on the set?
12	MS. SHAPIRO: Objection.
13	THE WITNESS: Are these hugs I'm so
14	sorry
15	BY MR. GOTTLIEB:
16	Q Sorry. This is
17	A Are these hugs that I initiated, or are
18	these hugs that I was a recipient of?
19	Q You can characterize it however you'd
20	like.
21	A I just want to be as accurate in my
22	testimony as possible
23	Q Okay.
24	A as it relates to the hugging. That
25	was my question that was the question. Which

	Page 117
1	one?
2	Q You can include hugs that you believe you
3	initiated and hugs you believe Ms. Lively initiated.
4	MS. SHAPIRO: Objection.
5	THE WITNESS: Like lump them all
6	together?
7	BY MR. GOTTLIEB:
8	Q Sure. Your best estimate.
9	A Okay.
10	Q Number of times.
11	MS. SHAPIRO: Objection.
12	THE WITNESS: Maybe a greeting and an
13	exit. So at the most maybe again, I don't know.
14	I don't know. I don't know. That's my answer to
15	you, Mr. Gottlieb. I don't know.
16	BY MR. GOTTLIEB:
17	Q Fair enough. And when you don't know,
18	that's what I always want your answer to be.
19	A I don't know.
20	Q Do you know who Vivian Baker is?
21	A Vivian Baker is Ms. Lively's makeup
22	artist, I believe.
23	Q Do you know that she testified under oath
24	in this case?
25	A I assume her testimony would be under

	Page 118
1	oath.
2	Q Do you know that she testified under oath
3	in this case?
4	A Yes.
5	Q Are you aware that she testified that
6	there was a culture of hugging on the set of
7	It Ends with Us?
8	A I am now.
9	Q Are you aware that she said that that
10	made a number of people uncomfortable?
11	A I find that odd.
12	Q You find that odd, why?
13	A Because Mrs. Baker was often the one that
14	would run up and give me a hug.
15	Q And because of that, you find it odd that
16	she testified that a number of people felt
17	uncomfortable with the culture of hugging on the set
18	of It Ends with Us?
19	A Correct.
20	Q Do you remember earlier when you
21	testified about the hot tub?
22	A You're referring to what? Sexually
23	harassed?
24	Q When you were sexually harassed in the
25	hot tub?

	Page 174
1	written:
2	(As read):
3	"As the two climax at the same time,
4	they lock eyes and cannot help but
5	smile, baffled that they found each
6	other"?
7	A Yes.
8	Q Whose idea was it to add "the two climax
9	at the same time"?
10	A Christy Hall.
11	Q When did she communicate that to you?
12	A We did it we were writing together.
13	We were in a room in my office. We were
14	specifically working on a lot of the sex scenes and
15	
16	Q What did sorry. Go ahead.
17	A And we yeah. This was we were
18	writing a movie that was filled with romance and
19	lust and intimacy and sex. And, again, these are
20	all outlines, right, so a script has far less
21	description than a book. So you have
22	It Ends with Us, which has a ton of pages and very
23	detailed descriptions of various scenes so that you
24	can paint the picture in your mind. And all writers
25	do. Which I learned a lot on this process, is you

Page 176

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

	Page 177
1	idea was that Ryle would then stop and say "just
2	watching you was enough" or "I'm good" or something
3	like that.
4	When I shared that with Ms. Lively, she
5	then made it personal and said ,"Oh, God, that would
6	mortify me if that happened to me." To which I then
7	responded, as one does because when you're two grown
8	adults with children who are married in the context
9	of talking about sex scenes, with a movie that
10	you're making with a person who is understanding
11	that there are going to be sex scenes in a book
12	based with a lot of sex in it, the only thing you
13	really have to share are personal experiences. So I
14	said, "Oh, well, some of the most beautiful moments
15	have been when that's happened with me and my wife."
16	And that was it.
17	Q So you were interested in shooting the
18	scene from the female gaze?
19	A I was interested in shooting all the sex
20	scenes from the female gaze.
21	Q Did Ms. Lively have a female gaze?
22	A I would imagine so if she's a female.
23	Q Did you believe she had one?
24	A Of course.
25	Q Did you believe that that gaze was

	Page 178
1	important in incorporating ideas about how these
2	various scenes should be shot?
3	MS. SHAPIRO: Objection.
4	THE WITNESS: Absolutely. That's why I
5	incorporated all of Ms. Lively's ideas without
6	hesitation.
7	BY MR. GOTTLIEB:
8	Q And it's your testimony that when you say
9	Ms. Lively said she would be mortified, that you
10	believe she was referring to?
11	A If that happened to her, were her words.
12	Q If that happened to her in her personal
13	life?
14	A Yes. It was a personal comment. Like it
15	was inferring that if she was inferring that if
16	her husband didn't finish, if she didn't finish her
17	husband or climax her husband, that she would be
18	mortified.
19	Q That's what
20	A That's what she said. So she said, "Oh,
21	that would mortify me if it happened to me."
22	Q Your recollection as you sit here today
23	about a meeting that occurred in April of 2023?
24	MS. SHAPIRO: Objection.
25	THE WITNESS: I would imagine that's the

	Page 203
1	to Brandon Sklenar like that.
2	Q So if somebody said they heard you say
3	that, your under-oath testimony would be they are
4	mistaken?
5	A My under-oath testimony is that I don't
6	believe I ever said anything to that to that
7	effect to Brandon Sklenar.
8	Q Did you say to Ms. Slate when you made
9	the "sexy" comment, that you could say that because
10	your wife was there?
11	MS. SHAPIRO: Objection.
12	THE WITNESS: My recollection of the
13	"sexy" comment was that it was all kind of said in
14	one sentence.
15	BY MR. GOTTLIEB:
16	Q And what was the one sentence?
17	A Ms. Slate walked in. As a director, I
18	was doing whatever I was doing, getting the set
19	ready. I looked over to her. She was wearing a
20	I believe black leather pants, which were designed
21	to, I'm sure, look sexy. And without thinking, I
22	said something to the effect of, oh, wow, those
23	pants look sexy on you. And my memory, if it serves
24	me correctly, I then my wife was in the room
25	nearby. And I think in my head I was like, oh,

	Page 300
_	
1	A No.
2	Q Did Mr. Heath?
3	A No.
4	Q Did anyone else?
5	A I don't know.
6	Q Did you want Ms. Lively to perform the
7	birth scene without most of her clothes on?
8	A No.
9	Q Did you ever tell Ms. Lively that your
10	wife had ripped her clothes off during childbirth?
11	MS. SHAPIRO: Objection.
12	THE WITNESS: I do not recall a
13	conversation where I said she ripped her clothes off
14	during childbirth.
15	BY MR. GOTTLIEB:
16	Q Do you recall ever sharing any
17	information with Ms. Lively in speaking about the
18	birth scene in the movie, where you recounted
19	information about your wife giving birth, to
20	Ms. Lively?
21	MS. SHAPIRO: Objection.
22	THE WITNESS: I remember numerous
23	conversations where Ms. Lively and I were talking
24	about our and I don't mean my birth, but our,
25	like, collective births, where she shared personal

	Page 301
1	information and then I shared personal information
2	about my wife.
3	BY MR. GOTTLIEB:
4	Q And as you sit here today, you can't
5	recall any conversation in which the topic included
6	the amount of clothing or the type of clothing that
7	Ms. Lively's character ought to wear during the
8	birthing scene?
9	MS. SHAPIRO: Objection.
10	THE WITNESS: I don't remember anything
11	specific about clothing. That was definitely not
12	the what we were talking about in terms of all
13	the conversation around the our births.
14	BY MR. GOTTLIEB:
15	Q Did you ever ask Mr. Heath to share any
16	portion of a video of his wife giving birth with
17	Ms. Lively?
18	A I did.
19	Q Did you specify when you asked Mr. Heath
20	to share that video with Ms. Lively what he should
21	share from it or how much he should share from it?
22	MS. SHAPIRO: Objection.
23	THE WITNESS: The only video I'm aware of
24	is after his after the birth of his child. So I
25	believe there's only one that I asked him to share.

Page 328

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

Page 348
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?

	Page <mark>349</mark>
1	A No.
2	Q When did you understand that?
3	A I believe this last week.
4	Q This last week is the first time you
5	understood that you were required to preserve
6	documents in this case?
7	A Yes, but I preserve them anyways.
8	Q What steps did you take to preserve your
9	documents, if any, in August of 2024?
10	A By not deleting anything.
11	Q Okay. So you didn't delete anything.
12	Did you have any understanding of the retention
13	policies that existed on your email account?
14	A Can you be more specific?
15	Q Do you have any knowledge as you sit here
16	today one way or the other, whether the email
17	accounts that you use have retention policies on
18	them?
19	MS. SHAPIRO: Objection.
20	THE WITNESS: Retention, meaning like
21	they stay or they don't stay?
22	BY MR. GOTTLIEB:
23	Q They stay or they get deleted after a
24	period of time.
25	A I always have on all my e-mails that they