## EXHIBIT "A"

## CONFIDENTIAL

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
00
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 VIVIAN BAKER
Los Angeles, California
Friday, September 12, 2025
Stenographically Reported by: Ashley Soevyn,
CALIFORNIA CSR No. 12019

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1	THE WITNESS: I did not witness that, no.
2	BY MS. GAROFALO:
3	Q You described for us, in response to
4	Ms. Bender's question, several incidents that you
5	characterized, I believe, as inappropriate.
6	Did all of those incidents occur during
7	the first phase of the filming?
8	A That would be correct.
9	Q Very quickly, you told us that you
10	prepared for this deposition by having at least one
11	meeting with your lawyers, and I think a couple of
12	Zoom calls; is that correct?
13	A Yes
14	MR. ROBERTSON: Ms. Baker, I'm just going
15	to again advise you to not get into any
16	conversations with your attorneys.
17	BY MS. GAROFALO:
18	Q And at no time am I asking you for
19	anything that you communicated with your attorneys.
20	So yes, so you had a few Zoom calls and a
21	meeting of a couple of hours to prepare for the
22	deposition, correct?
23	A Correct.
24	Q Was anybody else at the meeting that you
25	had with your counsel?

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1	REPORTER'S CERTIFICATE
2	I, ASHLEY SOEVYN, a Certified Shorthand
3	Reporter of the State of California, do hereby
4	certify:
5	That the foregoing proceedings were taken
6	before me at the time and place herein set forth;
7	at which time the witness was put under oath by me;
8	That the testimony of the witness, the
9	questions propounded, and all objections and
10	statements made at the time of the examination were
11	recorded stenographically by me and were thereafter
12	transcribed;
13	That a review of the transcript by the
14	deponent was/ was not requested;
15	That the foregoing is a true and correct
16	transcript of my shorthand notes so taken.
17	I further certify that I am not a relative
18	or employee of any attorney of the parties, nor
19	financially interested in the action.
20	I declare under penalty of perjury under
21	the laws of California that the foregoing is true
22	and correct. Dated this 13th day of September,
23 24	2025. John Steam
	ASHLEY SOEVYN
25	CSR No. 12019