

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

No. 24-cv-10049 (LJL) (lead case)

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

No. 25-cv-449 (LJL) (member case)

**NOTICE OF PLAINTIFF BLAKE LIVELY’S MOTION FOR SANCTIONS AGAINST
DEFENDANTS’ COUNSEL**

Plaintiff Blake Lively, by and through the undersigned counsel, hereby moves pursuant to New York Rule of Professional Conduct 3.6 (“N.Y. Rule 3.6”) and Federal Rule of Civil Procedure 16(f) for sanctions against Defendants’ counsel, Bryan Freedman. Ms. Lively respectfully submits that the Court should impose sanctions against Mr. Freedman as a consequence of his relentless media campaign to harm Ms. Lively’s character, credibility, and reputation.

For these reasons, and those set forth in more detail in the accompanying memorandum of law, the Court should impose sanctions on Mr. Freedman.

Respectfully submitted,

Dated: August 4, 2025

/s/ Michael J. Gottlieb

Esra A. Hudson (admitted *pro hac vice*)
Stephanie A. Roeser (admitted *pro hac vice*)
Manatt, Phelps & Phillips LLP
2049 Century Park East, Suite 1700
Los Angeles, California 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com

Matthew F. Bruno
Manatt, Phelps & Phillips LLP
7 Times Square
New York, NY 10036
(212) 790-4525
mbruno@manatt.com

Michael J. Gottlieb
Kristin E. Bender
Willkie Farr & Gallagher LLP
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com
mgoverski@willkie.com

Aaron E. Nathan
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019
(212) 728-8904
anathan@willkie.com

DUNN ISAACSON RHEE LLP
Meryl C. Goverski (*pro hac vice*)
401 Ninth Street, NW
Washington, DC 20004
(202) 240-2900
mgoverski@dirllp.com

Attorneys for Blake Lively

MEMORANDUM OF LAW

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

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v.

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Manatt, Phelps & Phillips LLP
2049 Century Park East, Suite 1700
Los Angeles, California 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com

Matthew F. Bruno
Manatt, Phelps & Phillips LLP
7 Times Square
New York, NY 10036
(212) 790-4525
mbruno@manatt.com

Michael J. Gottlieb
Kristin E. Bender
Willkie Farr & Gallagher LLP
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com
mgoverski@willkie.com

Aaron E. Nathan
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019
(212) 728-8904
anathan@willkie.com

DUNN ISAACSON RHEE LLP
Meryl C. Goverski (*pro hac vice*)
401 Ninth Street, NW
Washington, DC 20004
(202) 240-2900
mgoverski@dirllp.com

Attorneys for Blake Lively

DECLARATION

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP PR
LLC, JENNIFER ABEL, JED WALLACE, and
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL
(lead case)

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, IT ENDS WITH US
MOVIE LLC, MELISSA NATHAN, JENNIFER
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., and THE NEW
YORK TIMES COMPANY.

Consolidated Defendants.

No. 25-cv-449 (LJL) (member case)

**DECLARATION OF MICHAEL J. GOTTLIEB IN SUPPORT OF BLAKE LIVELY'S
MOTION FOR SANCTIONS AGAINST DEFENDANTS' COUNSEL**

I, Michael J. Gottlieb, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Willkie Farr & Gallagher LLP, 1875 K Street NW Washington, DC 20006 and counsel of record for Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively's Motion for Sanctions Against Defendants' Counsel.

3. I submit this declaration to place before the Court true and correct copies of the following documents.

4. A true and correct copy of a non-exhaustive list of public statements made by Bryan Freedman ("Freedman") prior to February 3, 2025 regarding the instant case and Ms. Lively, filed on January 21, 2025 at ECF No. 17-2, is attached hereto as **Exhibit A**.

5. A true and correct copy of a certified transcript of Freedman's February 5, 2025 interview on the podcast *2 Angry Men* is attached hereto as **Exhibit B**.

6. A true and correct copy of a certified transcript of Freedman's February 18, 2025 interview on the podcast *Hot Mics with Billy Bush* is attached hereto as **Exhibit C**.

7. A true and correct copy the TMZ article, dated February 19, 2025, entitled *Justin Baldoni's Attorney Blake's Amended Suit is 'Hearsay' . . . Where's the Evidence?* is attached hereto as **Exhibit D**.

8. A true and correct copy of the People magazine article, dated March 19, 2025, entitled *Justin Baldoni's Lawyer Accuses Ryan Reynolds of Trying to 'Run from the Flames' in Asking to Be Dismissed from Lawsuit* is attached hereto as **Exhibit E**.

9. A true and correct copy of the TMZ article, dated March 20, 2025, entitled *Justin Baldoni Lawyer Blake Is Abusing The Legal System!!! Slams Her Motion To Dismiss Lawsuit* is attached hereto as **Exhibit F**.

10. A true and correct copy of the TMZ article, dated April 4, 2025, entitled *Blake Lively To Justin Baldoni Mr. 'I Support Victims' Is Trying To Silence One!!! The Law Won't Let Him* is attached hereto as **Exhibit G**.

11. A true and correct copy of the People magazine article, dated April 4, 2025, entitled *Justin Baldoni Files Response to Blake Lively's Motion to Dismiss His Countersuit: 'We Will Continue to Fight,' Lawyer Says* is attached hereto as **Exhibit H**.

12. A true and correct copy of the People magazine article, dated May 8, 2025, entitled *Justin Baldoni's Lawyer Wants to Sell Tickets to Blake Lively's Deposition for This Reason (Exclusive)* is attached hereto as **Exhibit I**.

13. A true and correct copy of Freedman's June 10, 2025 interview with TMZ is attached hereto as **Exhibit J**.

14. A true and correct copy of the certified transcript of Freedman's June 11, 2025 interview with Megyn Kelly is attached hereto as **Exhibit K**.

15. A true and correct copy of an email produced by Jamey Heath in this litigation, bearing the Bates Stamp HEATH_000028186, is attached hereto as **Exhibit L**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 4, 2025

/s/ Michael J. Gottlieb

WILLKIE FARR & GALLAGHER LLP
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com

EXHIBIT A

Date	Description
December 21, 2024	<p data-bbox="488 237 1468 304">In a Statement to the New York Times, which was later published by various different media outlets, Mr. Freedman stated:</p> <p data-bbox="545 346 1354 636">It is shameful that Ms. Lively and her representatives would make such serious and categorically false accusations against Mr. Baldoni, Wayfarer Studios and its representatives, as yet another desperate attempt to 'fix' her negative reputation which was garnered from her own remarks and actions during the campaign for the film; interviews and press activities that were observed publicly, in real time and unedited, which allowed for the internet to generate their own views and opinions.</p> <p data-bbox="545 678 1354 1035">These claims are completely false, outrageous and intentionally salacious with an intent to publicly hurt and rehash a narrative in the media. Wayfarer Studios made the decision to proactively hire a crisis manager prior to the marketing campaign of the film, to work alongside their own representative with Jonesworks employed by Stephanie Jones, due to the multiple demands and threats made by Ms. Lively during production which included her threatening to not showing up to set, threatening to not promote the film, ultimately leading to its demise during release, if her demands were not met.</p> <p data-bbox="545 1077 1354 1367">It was also discovered that Ms. Lively enlisted her own representative, Leslie Sloan with Vision PR, who also represents Mr. Reynolds, to plant negative and completely fabricated and false stories with media, even prior to any marketing had commenced for the film, which was another reason why Wayfarer Studios made the decision to hire a crisis professional to commence internal scenario planning in the case they needed to address.</p> <p data-bbox="545 1409 1354 1551">The representatives of Wayfarer Studios still did nothing proactive nor retaliated, and only responded to incoming media inquiries to ensure balanced and factual reporting and monitored social activity.</p> <p data-bbox="545 1593 1354 1808">What is pointedly missing from the cherry-picked correspondence is the evidence that there were no proactive measures taken with media or otherwise; just internal scenario planning and private correspondence to strategize which is standard operating procedure with public relations professionals.</p>

	<p><i>See Read the Statement: Statement to The New York Times from Bryan Freedman, attorney for Justin Baldoni, Wayfarer Studios and all its representatives, N.Y. Times (December 21, 2024), https://www.nytimes.com/interactive/2024/12/21/us/statement-to-the-new-york-times.html.</i></p>
December 23, 2024	<p>In a statement released to The Hollywood Reporter and other media outlets, Mr. Freedman stated:</p> <p style="padding-left: 40px;">TAG PR operated as any other crisis management firm would when hired by a client experiencing threats by two extremely powerful people with unlimited resources. The standard scenario planning TAG PR drafted proved unnecessary as audiences found Lively’s own actions, interviews and marketing during the promotional tour distasteful, and responded organically to that which the media themselves picked up on. It’s ironic that The New York Times, through their effort to ‘uncover’ an insidious PR effort, played directly into the hands of Lively’s own dubious PR tactics by publishing leaked personal text exchanges that lack critical context – the very same tactics she’s accusing the firm of implementing.</p> <p><i>See James Hibberd, Justin Baldoni’s Publicist Breaks Silence, Defends Leaked Texts About Blake Lively, The Hollywood Reporter (December 23, 2024, 12:10 PM), https://www.hollywoodreporter.com/movies/movie-news/justin-baldoni-blake-lively-jennifer-abel-leaked-texts-1236093044/.</i></p>
December 28, 2024	<p>In a statement released to Deadline and other media outlets, Mr. Freedman stated:</p> <p style="padding-left: 40px;">I am not going to speak to when or how many lawsuits we are filing but when we file our first lawsuit, it is going to shock everyone who has been manipulated into believing a demonstrably false narrative. It will be supported by real evidence and tell the true story. In over 30 years of practicing, I have never seen this level of unethical behavior intentionally fueled through media manipulation. It reminds me of what NBC tried to do to Megyn Kelly and Gabrielle Union and we all know how that ended up. Standby.</p> <p><i>See Caroline Frost & Dominic Patten, Justin Baldoni Countersuit Against Blake Lively Will “Shock Everyone,” Lawyer Declares; Lively PR Rep Calls Out “False” Allegations Of Planted HR Stories – Update, Deadline (December 28, 2024, 5:47 AM), https://deadline.com/2024/12/blake-lively-justin-baldoni-it-ends-with-us-legal-complaint-counter-suit-1236243155/.</i></p>

December 31, 2024	<p>In a statement released to USA Today, and published by various other media outlets, Mr. Freedman stated:</p> <p>In this vicious smear campaign fully orchestrated by Blake Lively and her team, the New York Times cowered to the wants and whims of two powerful ‘untouchable’ Hollywood elites, disregarding journalistic practices and ethics once befitting of the revered publication by using doctored and manipulated texts and intentionally omitting texts which dispute their chosen PR narrative.</p> <p>In doing so, they pre-determined the outcome of their story, and aided and abetted their own devastating PR smear campaign designed to revitalize Lively’s self-induced floundering public image and counter the organic groundswell of criticism amongst the online public. The irony is rich.</p> <p>Make no mistake however, as we all unite to take down the NY Times by no longer allowing them to deceive the public, we will continue this campaign of authenticity by also suing those individuals who have abused their power to try and destroy the lives of my clients. While their side embraces partial truths, we embrace the full truth - and have all of the communications to back it. The public will decide for themselves as they did when this first began.</p> <p><i>See Pamela Avila, Justin Baldoni files \$250M lawsuit against New York Times over Blake Lively claims, USA Today (January 2, 2025, 7:25 PM), https://www.usatoday.com/story/entertainment/celebrities/2024/12/31/justin-baldoni-sues-new-york-times-blake-lively-accusations/77364901007/.</i></p>
January 3, 2025	<p>During an on-camera interview with <i>NBC Nightly News</i>, Mr. Freedman stated, among other things:</p> <p>...I am more than willing to take every single text message that exists out there. Lay them out. Put them on a website for the world to see...Have them see the truth and determine the truth for themselves...</p> <p><i>See Liz Kreutz, Saba Hamedy & Kalhan Rosenblatt, Justin Baldoni's attorney blasts New York Times story about Blake Lively 'smear campaign' story, NBC News (January 3, 2025, 9:46 AM), https://www.nbcnews.com/pop-culture/pop-culture-news/justin-baldonis-attorney-blasts-new-york-times-blake-lively-story-rcna186064.</i></p>

January 7, 2025	<p>In a statement released to People and other media outlets, Mr. Freedman stated:</p> <p>It is painfully ironic that Blake Lively is accusing Justin Baldoni of weaponizing the media when her own team orchestrated this vicious attack by sending the New York Times grossly edited documents prior to even filing the complaint.</p> <p>We are releasing all of the evidence which will show a pattern of bullying and threats to take over the movie. None of this will come as a surprise because consistent with her past behavior Blake Lively used other people to communicate those threats and bully her way to get whatever she wanted. We have all the receipts and more.</p> <p><i>See Jen Juneau & Elizabeth Rosner, Justin Baldoni's Lawyer Vows to Release 'Evidence' of Blake Lively's 'Pattern of Bullying': 'We Have the Receipts', People (January 7, 2025, 12:39 PM), https://people.com/justin-baldoni-lawyer-promises-to-release-evidence-blake-lively-bullying-8770498.</i></p>
January 7, 2025	<p>During an on-camera appearance on <i>The Megyn Kelly Show</i>, Mr. Freedman made the following statements, among others, which have been excerpted from his full interview:</p> <p>Blake Lively was no victim here. She was in control, she was in power. And she took over this Film.</p> <p>...</p> <p>[Ms. Lively] used these allegations of sexual harassment, and she used these allegations of bullying to try and leverage her position so that she could be the de facto director in the case.</p> <p>...</p> <p>I mean, you know, since I've been involved in this case I've gotten 50 either texts or emails or you know, things to my firm's website. You know, more than 50 actually, about this was my experience with Blake Lively. You know, we weren't allowed to talk to her on the set. We weren't allowed to ask for an autograph. We were, you know, instructed, you know, this way or that we were treated like this, I mean and you know, these things aren't coming because we're doing an investigation, these are completely organic. These are based on people's real life experiences. In fact, you know, we've come across evidence that, you know, shows that that even her own representatives, knew that she was threatening, and mean and tough, and wanted to get her way.</p> <p>...</p>

	<p>Let's break down what the sexual harassment is. I mean, we've just been through the Me Too movement. We've heard all sorts of serious allegations of sexual harassment that are really meaningful to victims, and and and [sic] really important. And Blake Lively if she was sexually harassed to to [sic] such a degree in this in, this Film, and in this situation, you know, she wouldn't have returned to the Film.</p> <p>...</p> <p>It's very clear what is being planted. There are evidence [sic] for all of these points. There are text messages for all these points. And unlike any case that I've handled in my entire career, it's the one case we're going to put every single text message, every single document, everything on a website for everyone in the public to read, come to their own conclusions. And they can determine whether or not there was sexual harassment here, there was a smear campaign, or there was retaliation because we have proof and receipts that absolutely and unequivocally show this is not true.</p> <p>...</p> <p><i>See Meg Storm, Exclusive: See Justin Baldoni's Text Messages with His 'It Ends with Us' Editors from Blake Lively Lawsuit, The Megyn Kelly Show (January 7, 2025), https://www.megynkelly.com/2025/01/07/justin-baldoni-text-messages-with-it-ends-with-us-editors-about-blake-lively/.</i></p>
January 16, 2025	<p>In a statement released to various media outlets, Mr. Freedman stated:</p> <p>This lawsuit is a legal action based on an overwhelming amount of untampered evidence detailing Blake Lively and her team's duplicitous attempt to destroy Justin Baldoni, his team and their respective companies by disseminating grossly edited, unsubstantiated, new and doctored information to the media.</p> <p>It is clear based on our own all out willingness to provide all complete text messages, emails, video footage and other documentary evidence that was shared between the parties in real time, that this is a battle she will not win and will certainly regret. Blake Lively was either severely misled by her team or intentionally and knowingly misrepresented the truth. Ms. Lively will never again be allowed to continue to exploit actual victims of real harassment solely for her personal reputation gain at the expense of those without power. Let's not forget, Ms. Lively and her team attempted to bulldoze reputations and livelihoods for heinously selfish reasons through their own dangerous manipulation of the media before even taking any actual legal action. We know the truth, and now the public does</p>

	<p>too. Justin and his team have nothing to hide, documents do not lie.</p> <p><i>See Tommy McArdle & Elizabeth Rosner, Justin Baldoni Sues Blake Lively and Ryan Reynolds for \$400 Million Alleging Defamation, Extortion over It Ends With Us, People (January 16, 2025, 2:32 PM), https://people.com/justin-baldoni-sues-blake-lively-ryan-reynolds-8768821.</i></p>
January 18, 2025	<p>In a statement released to Deadline, and later published by other media outlets, Mr. Freedman stated:</p> <p>After my clients filed a comprehensive lawsuit packed with almost 200 pages of undeniable facts and documentary evidence which crushed their false allegations of a smear campaign by providing doctored communications to the New York Times, Blake and her legal team have just one heinous pivot left, and that is to double down on the revoltingly false sexual allegations against Mr. Baldoni. The mere fact that Ms. Lively feels that she can publicly destroy Mr. Baldoni's reputation in an attempt to devastate his future career and then deny him or his team their own ability to defend themselves against her is preposterous.</p> <p>Mr. Baldoni never once publicly attempted to call Ms. Lively out for her own many wrongdoings during filming, he kindly addressed all her concerns during filming in the correct manner despite the fact that he wholly disagreed, he himself was committed to do things differently and to keep the peace as she specifically admitted to in her own lawsuit. We will not only continue to defend our clients against Blake's power, privilege and all out lies, but we will now fight even harder for the voiceless in the DV community who are unfairly suffering while she continues to push on her own self-serving and selfish vendetta in the media.</p> <p><i>See Dominic Patten, Justin Baldoni's Lawyer Decries "Revoltingly False Sexual Allegations" From Blake Lively As Lawsuits Fly; Brands At Business Heart Of Dispute, Deadline (January 18, 2025, 5:44 PM), https://deadline.com/2025/01/blake-lively-justin-baldoni-lawyer-latest-1236260673/.</i></p>
January 21, 2025	<p>Mr. Freedman released video footage from the production of the Film to <i>Us Weekly</i> and other media outlets. The footage begins with the following statement:</p> <p>Ms. Lively's complaint alleges that during a scene Mr. Baldoni and Ms. Lively were filming for a slow dance montage, Mr. Baldoni was behaving inappropriately.</p>

	<p>The following videos captured on May 23, 2023, clearly refute Ms. Lively's characterization of his behavior. The scene in question was designed to show the two characters falling in love and longing to be close to one another. Both actors are clearly behaving well within the scope of the scene and with mutual respect and professionalism.</p> <p><i>See Ruth Styles, Who's lying, Blake Lively or Justin Baldoni? Shocking It Ends With Us clip reveals the truth about abuse claims, Dailymail.com (January 21, 2025, 12:11PM), https://www.dailymail.co.uk/tvshowbiz/article-14308745/Blake-Lively-Justin-Baldoni-bombshell-clip-reveals-truth-abuse.html.</i></p>
January 21, 2025	<p>In a statement released to <i>Us Weekly</i>, alongside the above-referenced video footage, Mr. Freedman and/or his team stated:</p> <p><i>Us</i> received this video from legal counsel, Bryan Freedman who has gone on record numerous times and told the public that Justin Baldoni and team has nothing to hide and this video, once more proves this. Justin and team have the right to defend themselves with the truth and this is what we will be continuing to show with the upcoming website containing all correspondence as well as relevant videos that directly quash her claims.</p> <p><i>See Ryan Hudgins, Justin Baldoni's Lawyer Releases Video of 'It Ends With Us' Scene to Try to Disprove Blake Lively, US Weekly (January 21, 2025), https://www.usmagazine.com/entertainment/news/wayfarer-studios-releases-justin-baldoni-blake-lively-slow-dance-scene/.</i></p>

EXHIBIT B

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<p style="text-align: right;">Page 2</p> <p>1 HARVEY LEVIN: Okay. Now we have 2 Justin Baldon's attorney on, Bryan Freedman. 3 Bryan, welcome. 4 BRYAN FREEDMAN: How are you, Harvey? 5 HARVEY LEVIN: I'm good. So can I 6 throw this out? Because I have a feeling you are 7 going to be angry, but I'm just going to in full 8 disclosure tell you what I said and I believe 9 what Mark said. I don't think this case is ever 10 going to trial. I think you've kind of won the 11 PR battle and I feel like this case was filed for 12 PR reasons more than legal reasons. And you won 13 it. Nobody wants to sit for depositions, nobody wants 14 to go on the stand. I don't see this case ever 15 going to trial. 16 MARK GERAGOS: And to be fair, what I 17 said is if I'm representing Blake Lively, I am 18 going to do virtually anything to not let Bryan 19 Freedman depose my client. 20 BRYAN FREEDMAN: You know what? I'm 21 not really sure whether it's going to go to trial 22 or not go to trial, but I just know one thing. 23 Justin is a -- really, he's a great guy. I wish 24 this was more about him and less about, you know, 25 negativity, frankly.</p>	<p style="text-align: right;">Page 4</p> <p>1 settled at this point? 2 BRYAN FREEDMAN: I think what hasn't 3 been settled is the fact that he's -- you know, 4 they've lost four projects, significant projects, 5 the studio. There's obviously the reputational 6 and emotional distress harm. He's got two little 7 kids that, you know, pay attention to what goes 8 on in the world. His wife is devastated. And, 9 you know, and there's others involved in this too 10 that have lost significant business and personal 11 relationships. 12 MARK GERAGOS: I've said it a million 13 times, you've raised the Titanic in this case. 14 Because but for Bryan Freedman, Justin Baldoni 15 would have been crushed in this matter. And 16 that's where it was headed. And it was headed 17 for him to be crushed. 18 When you see the kinds of things that 19 were left on the cutting room floor, literally, 20 in that New York Times articles, it's 21 infuriating. 22 HARVEY LEVIN: But that's against the 23 New York Times. And I get that, and that is kind 24 of separate. 25 I guess what I'm wondering is if Blake</p>
<p style="text-align: right;">Page 3</p> <p>1 HARVEY LEVIN: Don't you feel like 2 you've won this PR war now? 3 BRYAN FREEDMAN: It's not even about 4 winning a PR war. It's -- honestly, it's about 5 saving someone's life. I mean, imagine, Harvey, 6 imagine you being accused of something that you 7 just didn't do, you just weren't part of. And 8 you're caught up in this and you're a real, 9 decent human being. And this is a powerful thing 10 that you're going through and your whole career 11 seems to have been gone and vanished before your 12 very eyes. 13 HARVEY LEVIN: I'm confused about that. 14 I know William Morris dropped Justin. But at the 15 same time, more people know who this guy is than 16 they did before this. And just in terms of the 17 (indiscernible) Nielsens that I see just in terms 18 of what comes at us here at TMZ, that Blake was 19 winning at the beginning and it turned around and 20 she's not now. So isn't it mission accomplished? 21 Because, you know, I know you're suing for huge 22 numbers. But especially your lawsuit against 23 Blake, you know, I feel like her lawsuit was a PR 24 -- to try and salvage PR and his was a reaction 25 to that. And hasn't that all kind of been</p>	<p style="text-align: right;">Page 5</p> <p>1 -- Bryan, Blake Lively, the last thing she wants 2 is to take the stand. She doesn't want her 3 husband to take the stand. She doesn't want 4 Taylor Swift to take the stand, nor do they want 5 to take the stand. 6 So if they came to you and just said we 7 will basically call this a massive 8 misunderstanding, can we just drop it, would you 9 entertain it? I'm curious. 10 BRYAN FREEDMAN: I mean, he was called 11 a sexual predator. So are they saying he's still 12 a sexual predator but it's a misunderstanding? 13 MARK GERAGOS: You know, Harvey, when 14 you're in the middle of representing one of these 15 people who is in the eye of the storm -- and 16 Bryan's done it a zillion times, I've done it a 17 fair amount of times -- you need to be 18 vindicated. Because at the end of the day you're 19 not -- you know, no amount of money will get you 20 back to square zero. 21 To your point, Harvey, as many people 22 didn't know Baldoni as they knew Lively. 23 However, Lively, be careful what you wish for, 24 the public has gone full Amber Heard on her. And 25 Baldoni could have been defined, as Bryan just</p>

<p style="text-align: right;">Page 6</p> <p>1 said, as the sexual predator but for the 2 magnificent job he has done here. So there's a - 3 - it's a horrible body blow to have to take and 4 have -- you know, can't leave your house. I 5 don't know and I haven't asked you this, Bryan, 6 but I assume he's got round-the-clock security 7 and his family has had to be relocated and the 8 whole bit. 9 BRYAN FREEDMAN: I mean, there's 10 certainly that invasion of privacy that goes on. 11 But I think it's not so much having something to 12 do with me that turned the tide. I mean, the 13 reason to put the information out there is just 14 because of who he is. It's the truth. It's just 15 the truth. And the reality is that, you know, 16 had there been these horrible things and had 17 there been these horrible text messages, had 18 there been this horrible information, you know, 19 that stuff would have been put out there, too. 20 MARK GERAGOS: I appreciate your 21 humility, but you and I both know, and I think 22 Harvey would say the same, a lot of lawyers in 23 your position would have just rolled over and 24 played dead. That's unfortunate. They would not 25 have fought back and just would have thought</p>	<p style="text-align: right;">Page 8</p> <p>1 I am looking forward to discovery because when 2 you start to look into what was in Stephanie 3 Jones' hands and what was in Leslie Sloane's 4 hands and what was in Blake Lively's text 5 messages and what those discussions were like, I 6 think we're going to find the answers to this 7 really quickly. 8 HARVEY LEVIN: You are going to depose 9 Blake Lively, Ryan Reynolds, Taylor Swift. Who 10 else? 11 BRYAN FREEDMAN: Well, I don't know 12 that we're going to depose Taylor Swift or not. 13 HARVEY LEVIN: Really? 14 BRYAN FREEDMAN: You know, I think 15 that's going to be probably a gametime decision. 16 I don't know that that decision has been made. 17 But I can tell you this, there's -- you know, 18 anyone that reasonably has information that can 19 be -- that can provide evidence in this case is 20 going to be deposed. 21 HARVEY LEVIN: That's Taylor Swift. 22 She was there for that meeting. 23 BRYAN FREEDMAN: She was there for that 24 meeting. 25 HARVEY LEVIN: Okay. Well, I am a</p>
<p style="text-align: right;">Page 7</p> <p>1 there's no way to stem this tide, it's a tsunami 2 coming at me. 3 HARVEY LEVIN: Yeah. So mark and I 4 were talking about something before you jumped 5 on. The whole thing is curious, the way Ryan 6 Reynolds got so involved in this. There was that 7 meeting at their penthouse where he confronted 8 Justin and allegedly screamed at Justin. And we 9 were talking about what brought all of this on. 10 Was it that Blake was going home and expressing 11 her dismay at things that were happening with him 12 or was this -- I mean, people are kind of talking 13 about this online. Kind of a love/hate kind of 14 thing where all of the sudden Ryan is just saying 15 just stop it, everybody. And I'm not saying that 16 happened, but people are talking that way. So 17 I'm just wondering what you think the motivation 18 was where this turned into nuclear war. 19 BRYAN FREEDMAN: Well, you know, as we 20 have alleged in our complaint that, you know, 21 this was a takeover of a movie. And, you know, 22 whether we find out exactly what the reasons for 23 the takeover were and who was behind the 24 takeover, I think we're going to find some 25 interesting documents when discovery starts. And</p>	<p style="text-align: right;">Page 9</p> <p>1 lawyer. I know what that means. And that's why 2 I'm just thinking that even when you take Blake 3 and Ryan out of it in terms of how they 4 personally feel about it all, I mean, to say that 5 we're going to make -- put Taylor Swift in the 6 middle of this whole thing, I think they are 7 going to do everything they can to avoid going to 8 court. Because the last thing they want is to 9 have their friend, the biggest star in the world 10 now, sitting on a stand being grilled by Bryan 11 Freedman. 12 BRYAN FREEDMAN: My assumption is that 13 they're going to probably take some legal actions 14 that are beyond the bounds of decency. And we'll 15 see if they can try to avoid a deposition. 16 HARVEY LEVIN: How could they do that 17 if there's relevance? 18 MARK GERAGOS: I'm going to object and 19 order the witness not to talk. 20 HARVEY LEVIN: You're not his lawyer. 21 You're his friend. Jeez. 22 BRYAN FREEDMAN: Mark is usually my 23 lawyer though. 24 HARVEY LEVIN: I'm working here, guys. 25 I mean, come on.</p>

<p style="text-align: right;">Page 10</p> <p>1 MARK GERAGOS: I know. You're working. 2 So am I. So am I. 3 Bryan, I have a question. And you 4 don't have to answer it if you think it skirts 5 it. 6 We were talking early on that when 7 Judge Liman came out yesterday on the record -- 8 so I'm not trying to influence anybody or get 9 anybody sideways -- he had mentioned that he was 10 not inclined to order compliance with the New 11 York rule, but that because stipulation of the 12 parties, he had reconsidered. Do you want to 13 describe what that means? Because we took a 14 flyer and I want to make sure we got it right. 15 BRYAN FREEDMAN: Look, I think that 16 every lawyer intends to follow the professional 17 rules of conduct. And that's -- there's been 18 every intention to do that in this case, and we 19 believe we've followed the professional rules of 20 conduct. And the professional rule of conduct at 21 issue talks about an exception. And that 22 exception is when your client is prejudiced by 23 public information that's not generated by you 24 but in fact generated by a third party or the 25 other party. And all we're trying to do is have</p>	<p style="text-align: right;">Page 12</p> <p>1 career and, you know, they can make money, they 2 can support their family. And that element is 3 what lawyers do outside the courtroom. 4 And so I always thought when judges 5 say, no, muzzle yourself, they're not allowing 6 you to fully represent a client. 7 BRYAN FREEDMAN: I don't think that's 8 what the judge is saying at all, muzzle yourself. 9 I think the judge is really saying, you know, 10 backed in accordance with, you know, professional 11 -- you know, the professional rules. And -- 12 HARVEY LEVIN: But what does that mean? 13 What does that mean? 14 BRYAN FREEDMAN: I think that it means 15 that if there's prejudice to your client as a 16 result of something that you didn't cause that 17 was caused by someone else or something else, 18 that you are allowed to put forth evidence to 19 make sure that that prejudice is remedied. 20 HARVEY LEVIN: So how does Justin feel 21 now? Does he feel like there is kind of a move 22 toward understanding and believing him more? Is 23 he taking solace in that? Is he still, you know, 24 devastated? Are the -- is the entertainment 25 industry backing away from him? Have they come</p>
<p style="text-align: right;">Page 11</p> <p>1 a fair process. That's all. 2 HARVEY LEVIN: You know, I've got to 3 tell you, I covered -- I have covered so many 4 cases. The OJ Simpson case was my life for a 5 long, long time. And there was -- and Rodney 6 King was my life. And every day both sides tried 7 to prejudice the jury pool. And ultimately it 8 didn't matter. And that's what lawyers do 9 anyway. They're not there to say I'm just going 10 to be a straight shooter. They're advocates at 11 the idea that you can taint a jury by holding a 12 news conference and talking about a text. To me 13 it's so ridiculous. And you look at OJ Simpson 14 and, you know, I reported every day there was 15 blood going from the bodies to his bathroom and 16 he was acquitted. 17 So the idea that a jury is somehow 18 going to remember what Bryan Freedman or the 19 other side said a year before a trial to me is 20 just -- I think the rule is stupid. Both of you 21 guys represent a lot of famous people. And 22 trials are kind of two-pronged. One, you want to 23 win the case that's before you. But then you 24 want to make sure that the person's life is okay 25 once the trial is over and that they still have a</p>	<p style="text-align: right;">Page 13</p> <p>1 back? What's going on in his world? 2 BRYAN FREEDMAN: I think he feels 3 really concerned about all of this and really sad 4 about all of it for everybody that's involved. I 5 think he goes through, you know, emotions that 6 everyone goes through in these types of 7 situations. But, you know, he's a really decent 8 human being and a decent person and has really 9 been very fair and not wanting to attack anyone. 10 But he is devastated, as anyone would be. 11 And the studio has lost hundreds of 12 millions of dollars. And as we've put forth in 13 the complaint, there are significant damages that 14 he suffered. And the emotional distress having 15 represented a number of people who have been 16 involved in these situations, the emotional 17 distress that people go through and how difficult 18 it is to walk through an airport, to walk through 19 your daily life to be with your children, to try 20 to be a normal father or husband and any of it 21 with all of this weighing on you is just 22 tremendously taxing. And he's going through it. 23 You know, like they all go through it. And we're 24 just -- you know, he's going to keep his head 25 held high and tell the truth and be honest and be</p>


<p style="text-align: right;">Page 14</p> <p>1 honorable. And we know that that will serve him. 2 HARVEY LEVIN: Bryan, thank you. You 3 are our first guest on our first 2 Angry Men 4 podcast. So thanks for jumping on. 5 BRYAN FREEDMAN: Okay. Well, I hope I 6 don't get sanctioned as a result of it. So -- 7 but I'm sure you guys will indemnify me. So 8 we'll be good. 9 HARVEY LEVIN: What could go wrong? 10 Thank you, Bryan. 11 BRYAN FREEDMAN: All right. Take care. 12 Thank you. 13 HARVEY LEVIN: Okay, Mark. We'll talk 14 next week. 15 MARK GERAGOS: Okay. Thank you. 16 HARVEY LEVIN: Thanks, guys. 17 18 19 20 21 22 23 24 25</p>	
<p style="text-align: right;">Page 15</p> <p>1 CERTIFICATION 2 3 I, Sonya Ledanski Hyde, certify that the 4 foregoing transcript is a true and accurate 5 record of the proceedings. 6 7 8  9 _____ 10 11 Veritext Legal Solutions 12 330 Old Country Road 13 Suite 300 14 Mineola, NY 11501 15 16 Date: July 15, 2025 17 18 19 20 21 22 23 24 25</p>	

EXHIBIT C

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13 Lively v. Baldoni

14 Lively v. Wayfarer Studios LLC et al, 24-cv-10049

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<p style="text-align: right;">Page 2</p> <p>1 BILLY BUSH: Is Bryan Freedman here?</p> <p>2 Do we have the great Bryan Freedman? Okay. This</p> <p>3 is great. Okay. The man who is running point</p> <p>4 for Justin Baldoni is his lawyer, Bryan Freedman,</p> <p>5 who has represented a lot of people. I mean, one</p> <p>6 Google search will overwhelm you. But Bryan is</p> <p>7 with us right now.</p> <p>8 Hey, Bryan. How are you, my friend?</p> <p>9 BRYAN FREEDMAN: I'm great, Billy.</p> <p>10 Good to see you.</p> <p>11 BILLY BUSH: Good to see you. Busiest</p> <p>12 man in the business there. So I'm sure you saw</p> <p>13 that, you know, that Blake and Ryan were at SNL's</p> <p>14 50th last night. Justin, if I'm not mistaken, is</p> <p>15 on vacation right now with his kids in Hawaii.</p> <p>16 Is he still there? Do you speak to him?</p> <p>17 BRYAN FREEDMAN: I do speak to him. I</p> <p>18 speak to him often. I wouldn't call it vacation.</p> <p>19 I don't think anybody who has been accused of</p> <p>20 heinous, you know, arguably what are crimes is on</p> <p>21 vacation. I think that he is trying to gather</p> <p>22 with his family and get some assemblance of</p> <p>23 peace.</p> <p>24 BILLY BUSH: How's he -- how's he</p> <p>25 doing? What's his state of mind while all this</p>	<p style="text-align: right;">Page 4</p> <p>1 as this New York Times thing, you know, comes out</p> <p>2 that Blake and the New York Times put out on</p> <p>3 December 20th. Liz Plank a couple days later</p> <p>4 drops Baldoni. I'm stepping away from the</p> <p>5 podcast given the light of what we've learned</p> <p>6 here.</p> <p>7 Brandon Sklenar, who is the other male</p> <p>8 lead I guess in It Ends With Us, he supports</p> <p>9 Blake in the beginning. He unfollows Baldoni.</p> <p>10 Just this morning he seems to have moved to</p> <p>11 neutral. He is now -- they're asking him are you</p> <p>12 Team Baldoni or are you Team Lively. He says I'm</p> <p>13 team the movie. I have a friend who went through</p> <p>14 this. He has completely now backed away.</p> <p>15 And there are these HR complaints that</p> <p>16 are circulating around social media, alleged</p> <p>17 complaints, that say there are two other women on</p> <p>18 the cast who also had situations with Justin that</p> <p>19 were no good. One saying he grabbed my butt</p> <p>20 while he was helping me in a scene, and the other</p> <p>21 one -- you know, just not good. But they're</p> <p>22 heavily redacted. And what I understand is that</p> <p>23 these were circulated to major news organizations</p> <p>24 and they did not go with it. They decided not to</p> <p>25 run it for fear of defamation I am sure, for fear</p>
<p style="text-align: right;">Page 3</p> <p>1 is going on? I notice a couple of pictures he's</p> <p>2 trying to play with his kids as the paparazzi</p> <p>3 catch him. I've been in that situation before</p> <p>4 where just things -- you're trying to be a good</p> <p>5 family man and play with your kids while, like,</p> <p>6 terrible stuff is happening out there. I think</p> <p>7 everybody goes in the barrel.</p> <p>8 But how is his mental health? Is he</p> <p>9 all right, this guy?</p> <p>10 BRYAN FREEDMAN: I think he's hopeful</p> <p>11 and I think he's grateful. He's grateful that</p> <p>12 he's with his family. He's grateful that he</p> <p>13 could be with his family and grateful that he</p> <p>14 could let other fire victims use his house so it</p> <p>15 could come of some use. But like anyone else who</p> <p>16 would be going through a situation where you're</p> <p>17 accused of something that you did not do and are</p> <p>18 suffering in a public way, I think it's -- you</p> <p>19 know, it's distressful to say the least.</p> <p>20 BILLY BUSH: Bryan, what's interesting</p> <p>21 to me now is a lot of these people who turned</p> <p>22 their back on Justin Baldoni right off the bat --</p> <p>23 like he did a podcast like the Man Enough</p> <p>24 Podcast, and he did it with this woman, Liz</p> <p>25 Plank, is his partner in the podcast -- as soon</p>	<p style="text-align: right;">Page 5</p> <p>1 of you in defamation. So they didn't run it.</p> <p>2 But some of these TikTokers have done it. It's</p> <p>3 out there. Do you have any information as to how</p> <p>4 this got out there and is this slander? Is this</p> <p>5 something you're looking into?</p> <p>6 BRYAN FREEDMAN: I think we're looking</p> <p>7 into everything. It's interesting, let me ask</p> <p>8 you, what are the dates of these HR complaints?</p> <p>9 Do you know the dates?</p> <p>10 BILLY BUSH: There's no dates. The</p> <p>11 dates are redacted; the names of the complainants</p> <p>12 are redacted. Except for on one of them there is</p> <p>13 an M. And in Blake's original when she went to</p> <p>14 Sony -- and by the way, they're not to Wayfarer</p> <p>15 Studios, Justin's company, they are to Sony, the</p> <p>16 distributor, to their HR department. And there's</p> <p>17 an M in there, which means at least one of the</p> <p>18 other ones came around the same time if it's May,</p> <p>19 unless it was March. But probably May, same time</p> <p>20 as Blake.</p> <p>21 BRYAN FREEDMAN: Right. Well, it</p> <p>22 sounds like we're playing Wheel of Fortune with</p> <p>23 the letters. I might buy a vowel to try to find</p> <p>24 out what month that is.</p> <p>25 I would like to -- you know, I'm not</p>


<p style="text-align: right;">Page 6</p> <p>1 really sure why the dates are redacted. That's 2 interesting. I understand why people could be 3 redacted I believe in certain privacy rights 4 certainly, but I'm not really clear on why dates 5 would be redacted. So it will be interesting to 6 see what the dates are. 7 And as far as Sony is concerned, I 8 believe there was a Variety article that I read 9 that's published that's out there that says Sony 10 received no complaints. And that's my -- 11 BILLY BUSH: Yes. Sony has said they 12 received no complaints. So Sony is going to have 13 to -- it seems to me that if Blake wants this to 14 stick or, you know, the other two -- no one else 15 is coming forward saying that they also were 16 harassed or experienced anything untoward with 17 their director, Justin Baldoni. But Blake's 18 going to have to get Sony to come forward, and I 19 don't think they have. And if they haven't, I 20 don't see them coming forward until it's time. 21 Would you -- I guess we'll eventually 22 know, right? Someone from Sony will have to say 23 something. 24 BRYAN FREEDMAN: Right. I'm unaware of 25 any other -- of any, frankly, HR complaints that</p>	<p style="text-align: right;">Page 8</p> <p>1 dealing with unless there's some good reason to 2 not have it narrowly tailored. 3 Again, you mentioned the latest move. 4 Wasn't the latest move last night? 5 BILLY BUSH: Oh, Saturday Night Live. 6 BRYAN FREEDMAN: Yeah. That seemed 7 like that might be the latest move. 8 BILLY BUSH: What did you think when 9 you saw, you know, Ryan, you know, make light of 10 the situation, I guess try to find some humor in 11 all this? 12 BRYAN FREEDMAN: I -- you know, I am 13 unaware of anybody, frankly, whose wife has been 14 sexually harassed and has made jokes about that 15 type of situation. 16 BILLY BUSH: Yeah. 17 BRYAN FREEDMAN: Yeah, I can't think of 18 anyone who has done anything like that. And so 19 it -- it surprised me. 20 BILLY BUSH: And it leads us to this 21 moment now where Blake's legal team has gone -- 22 they have an amended complaint, right? The judge 23 -- they went to the judge and said we need to 24 amend our complaint. We want some time. I think 25 the judge said you're not taking a ton of time.</p>
<p style="text-align: right;">Page 7</p> <p>1 have been filed. And I think if you look through 2 the website and you look through the documents, 3 you can see clearly from certain documents that 4 there were no HR complaints filed. 5 BILLY BUSH: Right. And that is true, 6 there were not. 7 So Blake's team, their latest move just 8 before the weekend, they subpoena -- they are 9 trying to subpoena two-and-a-half years of phone 10 records. Okay. And that means every 11 communication. Not just with all the parties, 12 but basically two-and-a-half years of Justin 13 Baldoni texting, calling anyone. I mean, God 14 forbid someone looks through my phone for two- 15 and-a-half years. I get cancelled again, big 16 guy. No one -- we're pretty sure we're going to 17 cancel people for thoughts that they're having. 18 But they want -- if you represented 19 Blake, would you, could you do that? Would a 20 judge ever under any circumstances allow two-and- 21 a-half years of your every communication with 22 every person alive to be made public? 23 BRYAN FREEDMAN: I think that the law 24 requires that things be narrowly tailored so that 25 they're related to at least the case you're</p>	<p style="text-align: right;">Page 9</p> <p>1 You can have until Monday. Well, that's today. 2 Maybe it's tomorrow because, you know, it's 3 President's Day. But apparently their team is 4 coming with an amended complaint. What does that 5 mean? I assume they're still going to have the 6 allegations of harassment and they're not going 7 to downplay it more than that. Do you have any 8 idea what's coming your way in that? 9 BRYAN FREEDMAN: Not really. I mean, 10 amended complaints happen all the time. People 11 change their complaints all the time. Rarely do 12 you see though people change the complaint to 13 such a degree that you change your story 14 completely. So my assumption would be the story 15 will be similar and there may be things that are 16 additive to it. But it feels like things that we 17 saw last night, things that -- you know, asking 18 for a broad range of discovery. 19 Look, when you ask for every document 20 for two-and-a-half years, you know, you as a 21 lawyer should know that that's inappropriate. 22 You know, a lot of people could think that 23 they're waiting for a response and that our 24 response would be to object to that and they 25 would then make a statement and the media saying</p>

<p style="text-align: right;">Page 10</p> <p>1 oh, look, they don't want the truth, Mr. 2 Baldoni's team does not want the truth to come 3 out. We actually want all evidence to come out 4 that's -- you know, that's proper and appropriate 5 evidence. But it feels like that was 6 gamesmanship and not really appropriate in terms 7 of what's proper discovery. 8 BILLY BUSH: Talking to Justin 9 Baldoni's lawyer, Bryan Freedman here. 10 Bryan, when you take on a client, like 11 this is -- you probably know this is going to be 12 another big, high-profile situation and you've 13 been in several of them before. But this is 14 probably the biggest one as far as news cycle and 15 certainly news interest. How extensively do you 16 vet your client? How long do you and Justin talk 17 about this so you feel comfortable in 18 representing him? Because you're as bullish on 19 this guy as there is. 20 BRYAN FREEDMAN: I looked through every 21 document, every email, every text message, 22 listened to stories, listened to the history of 23 what he's been through, listened to voice notes. 24 And really try to evaluate the strength of the 25 defense of the case. And frankly in this case</p>	<p style="text-align: right;">Page 12</p> <p>1 disrespect to my lawyer, who has passed on. A 2 wonderful man, lovely guy. But, boy, I was 3 ground zero. I sure wish you were around. I've 4 spoken to you before about this situation, and 5 I've been -- oh. 6 But anyway, the PTSD kind of just comes 7 up a little bit. But you know. 8 BRYAN FREEDMAN: And here's the great 9 thing about you. All right? Is that you bounce 10 back and you're terrific at what you do. You're 11 a great guy. I don't know if people know. 12 You're a fantastic pickleball player. 13 BILLY BUSH: Very good. 14 BRYAN FREEDMAN: And you take it very 15 seriously. But, you know, who you are as a 16 person shine through. And at the end of the day 17 you're going to be successful in whatever you do. 18 BILLY BUSH: So, Bryan, thank you, 19 buddy. You're sitting there -- so basically this 20 170-some page document that you put out of all 21 these communications with Justin and Blake and 22 Ryan and Jamie Heath, Justin's producing partner, 23 and the publicist and all these people, you 24 basically started building that document the 25 moment you met Justin. And then did you get to a</p>
<p style="text-align: right;">Page 11</p> <p>1 the strength of his claims. And like a lawyer is 2 obligated to do, really want to make sure that I 3 go through as much as possible to really 4 understand what exactly happened or at least what 5 it seems like happened. 6 And I did that, you know, thoroughly in 7 this case and really got an understanding as to 8 what happened and what didn't happen. And 9 certainly more evidence will come to light and 10 more information will come to light. And I think 11 people will see it in a similar fashion. But 12 it's an honor to represent Justin. And I say 13 that because of the person he is, what he's been 14 through. 15 And, you know, like you, Billy, you 16 went through something that was so not 17 appropriate. NBC treated you in such a poor way. 18 And, frankly, you're about -- you know, I don't 19 know what the ultimate resolution was. But the 20 resolution should have ended up with a lot of 21 people at NBC being fired and you getting a large 22 check and them apologizing at a minimum. And 23 that wasn't right. You weren't treated fairly. 24 And honestly, Justin has not been treated fairly. 25 BILLY BUSH: Oh, boy. And no</p>	<p style="text-align: right;">Page 13</p> <p>1 point where you were like, I'm just going to make 2 this public? This is all a chain here that, you 3 know, people can read for themselves. 4 BRYAN FREEDMAN: You know, if I can 5 look at it and I can look through it and I can 6 see truth and the client's telling the truth and 7 I'm hearing truth from others, you know, what are 8 we afraid of? What are we afraid of? Put it out 9 there. Put the receipts out there. You have 10 them. 11 You know, and look, it's not just me. 12 You've seen social media. You've seen some 13 mainstream media. Certainly not the New York 14 Times. But you've seen social media and these 15 TikTokers and people on YouTube. They're 16 amazing. They're brilliant. They're -- 17 BILLY BUSH: Candace Owens has been on 18 this like you wouldn't believe. She is a 19 tigress. And @stephwithdads on TikTok. I 20 mean, there are so many people that are 21 fascinated here. 22 But they're justice warriors, you know 23 what I mean? They see an injustice. And now I 24 think metadata and all this stuff, you can track 25 so much of this stuff. I mean, people are doing</p>

<p style="text-align: right;">Page 14</p> <p>1 -- you know, you've got free paralegals out there, man.</p> <p>3 BRYAN FREEDMAN: And they -- you know, arguably we could live in a justice system one day where those types of people that have that type of information that are willing to do that type of diligence should actually be the jury one day.</p> <p>9 And as you know, they are the jury for years. Because people are cancelled, people have projects taken away from them, people are ridiculed, people are shunned. You know, right away, right when the allegation happens. There's no -- and these people actually give someone a chance to dig through things and let the public say -- you know, say to the public hold on, this doesn't seem like -- this doesn't seem to be true.</p> <p>19 There are things that show up that are different than what is being said. And thank God and thank the universe for those people out there. Because it's just one person helping another. And we're all trying to get to the truth.</p> <p>25 BILLY BUSH: So there was mediation.</p>	<p style="text-align: right;">Page 16</p> <p>1 Armie Hammer. Just like everything on the slate gone. So, geez, out he goes. That's really too bad for Justin.</p> <p>4 So what happens with him now? I mean, what -- what do you do? Does he want the money? Does he want a full-blown apology by Blake? Does he want her to fall on the sword and say I made this up? What do you need to hear? What does he need to hear?</p> <p>10 BRYAN FREEDMAN: I think he wants a determination. I know he wants a determination that he did not engage in the behavior that is alleged and that he did not engage in sexual harassment or create a smear campaign or anything like that. And there have been some serious allegations leveled against him that he is not making jokes about, that he is not creating -- you know, creating, you know, movies and other things where he makes a joke about his situation. But he wants his justice. He wants a chance to be able to prove that he is a good person. And he is a good person.</p> <p>23 BILLY BUSH: Yeah. I mean, this poor guy. I mean, he has been under major, major -- I keep bringing up the example of Lance Armstrong.</p>
<p style="text-align: right;">Page 15</p> <p>1 There was going to be -- there was an idea of mediation. And both sides, your side and Blake's, shot it down. No one -- were you open to mediating this and the other side said no? Because I don't understand why this -- this could -- this could and should end, but it has to be them, right?</p> <p>8 BRYAN FREEDMAN: Well, I'll comment on what I can. It was in what was filed with the court before the Rule 26 hearing the question was asked about whether we would be willing to go to mediation and whether we were open to that. Our answer to that was no. We're not willing to do anything until Justin is cleared of being called a predator, of being called a sexual harasser. Until that is determined to have not happened, we will be doing this.</p> <p>18 BILLY BUSH: What is most important to Justin, the \$400 million or some kind of financial settlement to make up for maybe lost -- has he lost work? Has he lost -- you know, have people backed away from him for a future project?</p> <p>23 BRYAN FREEDMAN: A substantial amount of work.</p> <p>25 BILLY BUSH: Really? Reminds me of</p>	<p style="text-align: right;">Page 17</p> <p>1 When he was wrong, he was definitely caught doping, he started tearing down the world around him. He started to say, well, that guy did this and that guy's a liar and this one, this. And he started burning scorched earth all around him because he was so far in. He was past the point of return. He couldn't come back. Do you think that that's what's happening here, that that's why you called this attempt to subpoena two-and-a-half years of every phone call Justin Baldoni has ever made? You know, a massive fishing expedition, is that -- is that what's happening here?</p> <p>14 BRYAN FREEDMAN: I actually don't know what's happening there. I don't know if it's that or anything else. But I can tell you this. Justin is not disparaging anyone or going after anyone's character or doing anything that is otherwise untoward. And he's given very clear instructions to me and the legal team to really, you know, be aboveboard and to really treat people with respect. And that's what we're trying to do within the search to show the court and the truth and the truth of what happened.</p> <p>25 And, you know, documents don't lie; people do.</p>

<p style="text-align: right;">Page 18</p> <p>1 BILLY BUSH: I mean, it would just be 2 amazing that a guy like Justin Baldoni, who does 3 a podcast with a woman named Liz Plank about 4 being a better man, about what -- he's like -- he 5 calls himself a feminist. He wears the t-shirt. 6 I mean, if this guy was a sexual harasser, it 7 would be like, you know, the Catholic Church 8 scandal that happened. It would be monumentally 9 mind-blowing, you know, of a takedown. It's just 10 -- it's almost like did she not even do research 11 into who the guy is? I mean, it would be a huge 12 fraud. 13 But you know him well, right? I mean, 14 you know this man. You know his family, you know 15 his wife. You like him. 16 BRYAN FREEDMAN: You know, one of the 17 great things about my job is that I get to be 18 with people and see them in the deepest, darkest 19 moments of their life. 20 BILLY BUSH: Yeah. 21 BRYAN FREEDMAN: And in situations 22 where, you know, they have never been before. 23 And I have the opportunity to work with them and 24 to try to find the gift. Because although this 25 is what no one would wish for, maybe there's</p>	<p style="text-align: right;">Page 20</p> <p>1 said then Baldoni and his producer are really, 2 really bad guys. Have you had -- have you spoken 3 to Ari and what do you -- do you think his 4 motives are anything more than financial? 5 Because Ryan is an extremely huge client. 6 BRYAN FREEDMAN: A lot of people 7 thought Martin Luther King was a bad person and 8 outrageous. I wouldn't want to be on the wrong 9 side of history here. 10 BILLY BUSH: We've got Baldoni now as 11 Martin Luther King. Baldoni. Oh my gosh. 12 BRYAN FREEDMAN: I just say that 13 because, you know, you never want to prejudge a 14 situation. 15 BILLY BUSH: Right. 16 BRYAN FREEDMAN: You want to really 17 look at the facts and look at the evidence and 18 understand what it is that's going on and really 19 take your time with it. I think it's important 20 for that. 21 And, you know, Ari Emanuel has a 22 client. Two clients in this case. Used to have 23 three. 24 BILLY BUSH: Yeah. 25 BRYAN FREEDMAN: But has clients. He</p>
<p style="text-align: right;">Page 19</p> <p>1 something that's a real gift here. And maybe 2 what this will turn out and the gift that will 3 happen is that people will stand up to those that 4 have more power and they will say I'm not just 5 going to back down and go away. And they will 6 stand up and say no matter what it takes, going 7 to prove that I am correct and this person has -- 8 is not correct and what's being leveled against 9 me is not true. 10 BILLY BUSH: Yeah. 11 BRYAN FREEDMAN: And maybe that's what 12 he will be remembered for one day. But, you 13 know, again, he is such a good person and become 14 such a friend and someone I have such great 15 compassion for and empathy for. But there's 16 another reason for this, and we may never know 17 about it. But the truth is Justin is a really, 18 really honorable human being. 19 BILLY BUSH: Well, some of you 20 mentioned people with power. You know, Ari 21 Emanuel is a big -- is a big, powerful -- he's as 22 powerful as it gets in the world of agents in 23 Hollywood. And he came out and said, you know, 24 if these allegations are true, you know, then 25 Baldoni -- he would be smart to say if -- but he</p>	<p style="text-align: right;">Page 21</p> <p>1 represents his clients. What would one expect 2 him to say? 3 BILLY BUSH: Has anyone picked up 4 Justin Baldoni, any agency? CAA or UTA or some 5 of the competing agencies? Have they picked up 6 Baldoni? 7 BRYAN FREEDMAN: I don't think he's in 8 a position right now where he's taking meetings 9 or doing anything like that. I don't think he's 10 in a position at the moment to do that. But 11 there are -- you know, look, he's an extremely 12 talented person. You know, I believe that this 13 will go wonderfully in his favor. And I do 14 believe he'll be working again one day. 15 BILLY BUSH: so if they come with money 16 and a full-blown apology to Justin, you'll accept 17 it maybe and end this as quickly as possible. I 18 think the quicker it ends probably the better if 19 the terms are met. 20 BRYAN FREEDMAN: Well, let's remember. 21 You know, Justin is not the only one here that's 22 been harmed. There's been accusations leveled at 23 Jen Abel, at Melissa Nathan. 24 BILLY BUSH: These are the publicists 25 that represent Baldoni. Right. Yeah.</p>

6 (Pages 18 - 21)

<p style="text-align: right;">Page 22</p> <p>1 BRYAN FREEDMAN: Right. There have 2 been other lives that have been, you know, really 3 destroyed. I mean, people were served process 4 the day of the L.A. fires. Just, you know, 5 people have gone through a lot. You know, this 6 Jed Wallace has been -- has sued early on in 7 this. You know, there are other people. 8 Wayfarer Studios and Jamie Heath, allegations 9 were alleged against Jamie Heath that were -- 10 that are horrible and completely untrue. 11 BILLY BUSH: That's Justin's producing 12 partner, Justin's partner at Wayfarer who was 13 producing the film with him. And Jed Wallace you 14 you mentioned, the crisis PR guy that they had to 15 hire when things started to slide. So he's got 16 his own lawsuit against Blake and she's got one 17 against him. I mean, this is unbelievable. I 18 don't know how this thing ends. But I think 19 you're probably prepared to go all the way for 13 20 more months until the court date. 21 And why is it March of '26? Why can't 22 we get this on a little quicker? 23 BRYAN FREEDMAN: March of '26 is 24 actually a really fast date as far as the law is 25 concerned. I mean, I have cases -- and look, I'm</p>	<p style="text-align: right;">Page 24</p> <p>1 day. But my son said, you know, everyone's been 2 affected by this fire in Los Angeles in one way 3 or the other, whether you're, you know, a pool 4 man or you're a pool person, you're a gardener, 5 you're working for someone, you're a bellman at a 6 hotel that's now more crowded than it was before. 7 Somehow, you're affected. 8 BILLY BUSH: Yeah. 9 BRYAN FREEDMAN: And he taught me that 10 if you think about what the other person is going 11 through, sometimes what you're going through 12 becomes a little bit easier. And I want to take 13 his advice. 14 BILLY BUSH: I think that's right. 15 It's also a good way to handle anxiety. If you 16 have anxiety in life, think about what other -- 17 just focus on someone else and it goes away. 18 Bryan Freedman representing Justin 19 Baldoni. Ever-constant touch, man. Thank you. 20 thank you very much. Appreciate it. 21 BRYAN FREEDMAN: Thank you. Thank you. 22 I appreciate it. Thanks. 23 24 25</p>
<p style="text-align: right;">Page 23</p> <p>1 on both sides of this issue. You know, the 2 sexual harassment, domestic violence issues, 3 things like that. You know, I represent Twigs 4 against Shia LaBeouf. You know, and I'm not just 5 on one side of the issue. You know, I'm on the 6 side of the issue that's about truth and about 7 transparency and about honesty. 8 And so, you know, unfortunately the 9 court system, you know, whether it's COVID or 10 whether it's anything else that comes in the way, 11 fires, this, that or otherwise, court cases and 12 courts get backed up and -- and it can be five, 13 six years until you get your case heard. 14 BILLY BUSH: Yeah. Well, Bryan, I've 15 kept you for so long. I appreciate it. By the 16 way, you said fires happen. You lost your own 17 home. You've been working and going back and 18 forth and you're in hotels when you're around Los 19 Angeles because of your own house. I am so sorry 20 about that and I hope you've made progress on 21 finding a temporary here in town. But what a 22 terrible loss for you and your wife. 23 BRYAN FREEDMAN: You know, my son 24 taught me something, one of my sons taught me 25 something. Actually they both teach me every</p>	<p style="text-align: right;">Page 25</p> <p>1 CERTIFICATION 2 3 I, Sonya Ledanski Hyde, certify that the 4 foregoing transcript is a true and accurate 5 record of the proceedings. 6 7 8  9 _____ 10 11 Veritext Legal Solutions 12 330 Old Country Road 13 Suite 300 14 Mineola, NY 11501 15 16 Date: July 15, 2025 17 18 19 20 21 22 23 24 25</p>

7 (Pages 22 - 25)

EXHIBIT D

Justin Baldoni's Attorney Calls Blake Lively's Amended Suit 'Hearsay'

JUSTIN BALDONI'S ATTORNEY BLAKE'S AMENDED SUIT IS 'HEARSAY' ... Where's the Evidence???

EXCLUSIVE



By **TMZ STAFF**

Published February 19, 2025 9:23 AM PST | Updated February 19, 2025 1:09 PM PST



Getty/Shutterstock Composite

Blake Lively's new allegations against **Justin Baldoni** are missing one critical thing -- cold hard proof he did her wrong ... at least that's how Justin's attorney is reading the documents.

Bryan Freedman tells TMZ, he found Blake's amended lawsuit -- **filed late Tuesday night** -- "underwhelming" when it comes to any new facts or anything damning against his client.



TMZ.com

Freedman says the suit is "filled with unsubstantial hearsay of unnamed persons who are clearly no longer willing to come forward or publicly support her claims." He adds that his clients -- Baldoni, his publicists, and Wayfarer Studios -- "have been transparent in providing receipts, real time documents and video showing a completely different story than what has been manipulated and cherry picked to the media."

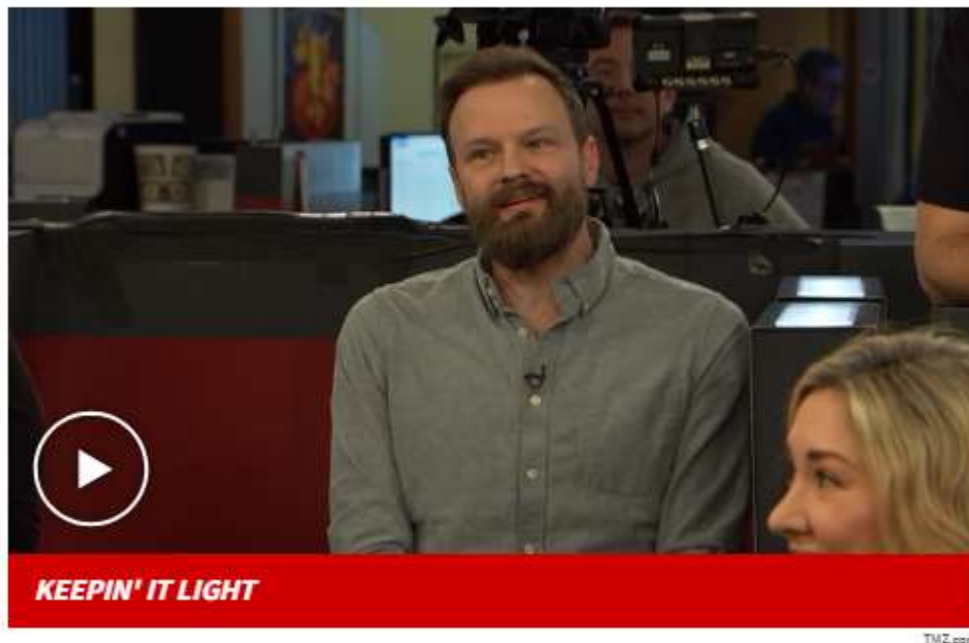


Getty

Freedman also referenced Blake and **Ryan Reynolds** going to the "SNL 50" event last weekend, saying ... "Our clients have taken this matter and these issues very seriously notwithstanding the jokes made publicly by the plaintiff and her husband."



Blake's new docs say there were 2 other women on the set of "It Ends With Us" who were uncomfortable with Justin's behavior, and reported that to an exec at Sony ... which distributed the film. Blake also says those 2 women, unnamed at this point, are willing to share documents and testify in court.



Freedman doesn't seem the least bit worried, telling us ... "Since documents do not lie and people do, the upcoming depositions of those who initially supported Ms. Lively's false claims and those who are witnesses to her own behavior will be enlightening. What is truly uncomfortable here is Ms. Lively's lack of actual evidence."



Blake is suing Justin for sexual harassment on the set, and for engaging in a smear campaign against her -- she's also added a defamation claim against Freedman -- but, remember, Justin's suing Blake, Ryan and the New York Times for trying to torpedo his reputation and career.

EXHIBIT E



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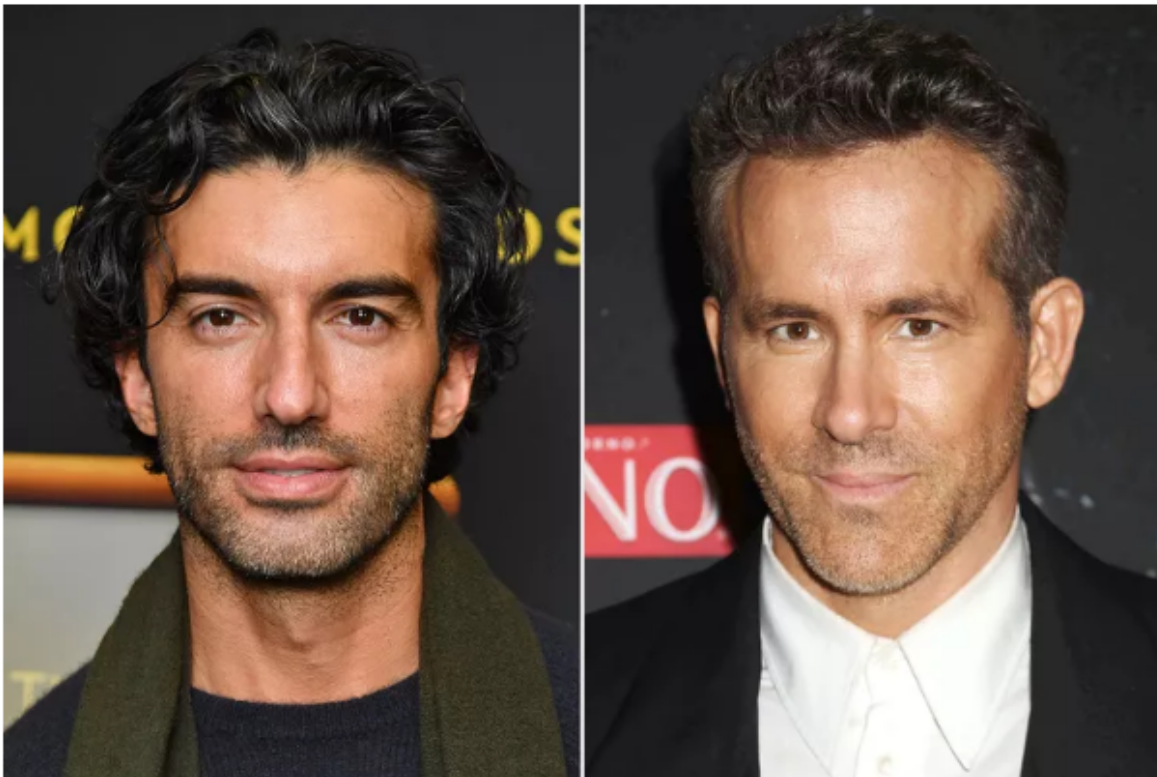
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Justin Baldoni's Lawyer Accuses Ryan Reynolds of Trying to 'Run from the Flames' in Asking to Be Dismissed from Lawsuit

Ryan Reynolds' lawyers argued Justin Baldoni's complaints against Reynolds do not qualify as defamation in a new court filing

By [Tommy McArdle](#) | Published on March 19, 2025 04:56PM EDT

64 COMMENTS



Justin Baldoni; Ryan Reynolds.

Credit : Stephen Lovekin/Shutterstock; Nancy Kaszerman/ZUMA Press Wire/Shutterstoc

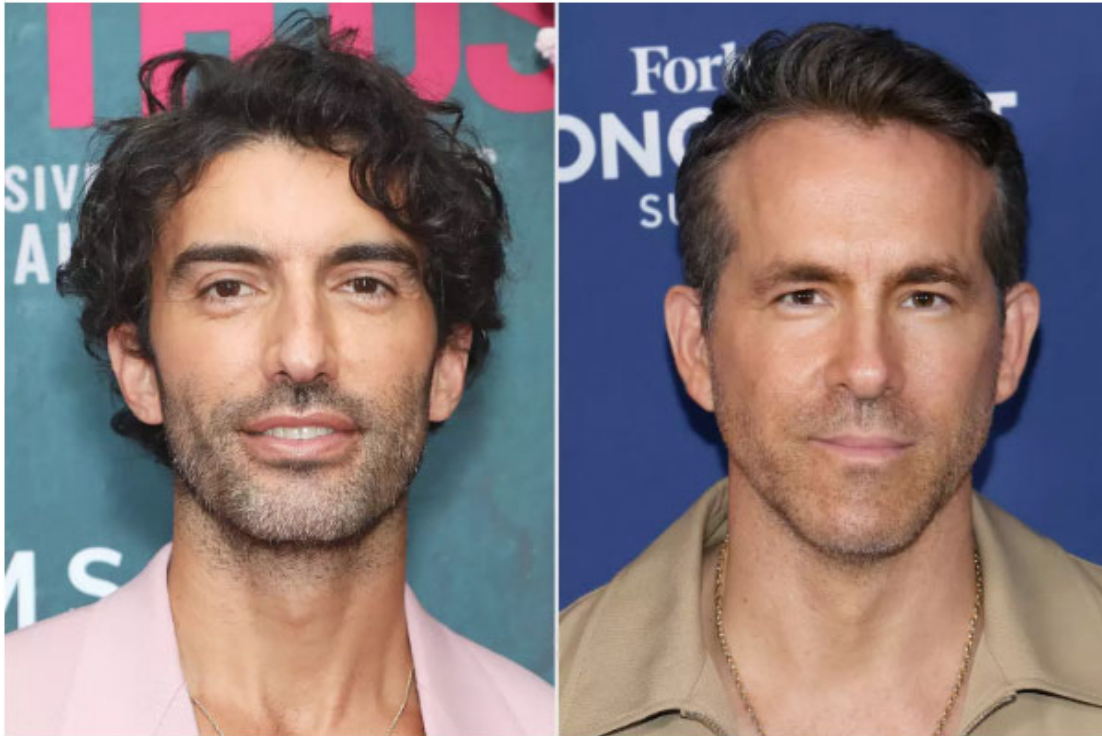
[Justin Baldoni's](#) lawyer is calling out [Ryan Reynolds](#) after the *Deadpool* actor [moved to dismiss Baldoni's defamation lawsuit](#) against him.

After Reynolds, 48, filed a motion to dismiss Baldoni's complaint on Tuesday, March 18, arguing that Baldoni's claims of defamation have no legal merit, Baldoni's lawyer [Bryan Freedman](#) responded in a statement saying Reynolds is "arrogantly asking to be dismissed from the case despite his publicly documented involvement extending far beyond just being a 'supportive spouse.' "

"Mr. Reynolds was a key player in the scheme," Freedman said, arguing that Reynolds' "fingerprints have been all over this smear campaign against Justin and the Wayfarer team since day one."

"Mr. Reynolds now attempts to reduce plainly cognizable claims to 'hurt feelings,' sending a clear message that bullying is acceptable," he added. "After lighting a match, Mr. Reynolds now seeks to run from the flames. It won't work. The Wayfarer Parties' claims against him are real, and they are serious. Mr. Reynolds can [appear on as many sketch shows as he wants](#) and feebly try to make light of his current situation, but we will not stop until he is held accountable for his actions."

RELATED: [Blake Lively's Justin Baldoni Legal Battle Becomes Subject of Documentary Titled *He Said, She Said*](#)



Justin Baldoni; Ryan Reynolds.

Credit: Gregory Pace/Shutterstock; Taylor Hill/Getty

Baldoni, 41, initially filed a \$400 million defamation lawsuit against Reynolds, his wife [Blake Lively](#), their publicist Leslie Sloane and Sloane's PR firm Vision PR Inc. over [behind-the-scenes issues during the production of *It Ends With Us*](#) in January.

Reynolds' attorneys Mike Gottlieb and Esra Hudson said in a statement on March 18 that Baldoni's case against Reynolds "appears to be based on Mr. Reynolds allegedly privately calling Mr. Baldoni a 'predator.' "

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"But here's the problem — that is not defamation unless they can show that Mr. Reynolds did not believe that statement to be true," the statement continues. "The complaint doesn't allege that. In fact, it suggests the opposite: that Mr. Reynolds genuinely believes Mr. Baldoni is a predator."

RELATED: [Blake Lively Shares New Selfie with Ryan Reynolds Set to Rolling Stones' 'Wild Horses' amid Justin Baldoni Lawsuits](#)



Blake Lively and Ryan Reynolds on July 22, 2024; Justin Baldoni on Aug. 6, 2024.

Credit: Taylor Hill/WireImage; John Nacion/Variety via Getty

Gottlieb and Hudson additionally cited the First Amendment while saying that Reynolds has the right "to express his opinion of Mr. Baldoni, which should be comforting to a group of people who have repeatedly called Ms. Lively and Mr. Reynolds 'bullies' and other names over the past year."

Lively initially [filed a complaint](#) in December 2024 against Baldoni, *It Ends With Us* producer [Jamey Heath](#) and Heath and Baldoni's production company Wayfarer Studios, as well as its co-founder Steve Sarowitz, claiming sexual harassment and an alleged retaliatory public smear campaign to "destroy" her reputation.

Attorneys for both Lively and Baldoni opted out of "inappropriate" and "premature" pre-trial mediation in February; both cases in *Lively v. Wayfarer Studios et al.* are currently scheduled to go to trial in March 2026.

EXHIBIT F

Justin Baldoni's Lawyer Fires Back at Blake Lively's Motion to Dismiss

JUSTIN BALDONI LAWYER BLAKE IS ABUSING THE LEGAL SYSTEM!!! SLAMS HER MOTION TO DISMISS LAWSUIT

EXCLUSIVE



By **TMZ STAFF**

Published March 20, 2025 6:12 PM PDT | Updated March 21, 2025 2:50 PM PDT



Getty

Justin Baldoni's lawyer is firing back at **Blake Lively's** attempt to cut herself out of the ongoing legal drama surrounding the film, "It Ends with Us."

Bryan Freedman tells TMZ ... "Ms. Lively's recent motion to dismiss herself from the self-concocted disaster she initiated is one of the most abhorrent examples of abusing our legal system."



Getty

Freedman says "stringent rules are put into place to protect the innocent and allow individuals to rightfully defend themselves," while noting "laws are not meant to be twisted and curated by privileged elites to fit their own personal agenda."



TMZ.com

Earlier today ... TMZ broke the story that Blake filed her motion to dismiss, saying Baldoni violated the law by filing his own lawsuit for the purposes of revenge.



Blake says Baldoni **filed his defamation suit** against her, her husband, **Ryan Reynolds**, and her publicist, Leslie Sloane, right after she filed her **lawsuit against him**. **In her suit, Blake accused Justin of sexually harassing her**, and launching a smear campaign during the filming of the flick. As you know, Baldoni was the movie's director and Blake's costar.



As we reported Wednesday ... Reynolds was first to file a motion to be dismissed from Baldoni's suit, claiming Justin labeled him a "predator." But, Reynolds argued, it's not defamation because he believes the statement to be true, and Justin would have to prove otherwise.

In his statement to TMZ, Freedman reiterated ... "As we said yesterday in response to Mr. Reynolds' same cowardly measures, we will continue to hold Ms. Lively accountable for her actions of pure malice which include falsely accusing my clients of harassment and retaliation."

Freedman summed it up by saying Blake's "fantastical claims will be swiftly debunked as discovery moves forward, easily disproved with actual, evidentiary proof."

We reached out to Blake's team for comment ... so far, no word back.

EXHIBIT G



Blake Lively Says Justin Baldoni Trying to Silence All Harassment Victims

BLAKE LIVELY TO JUSTIN BALDONI MR. 'I SUPPORT VICTIMS' IS TRYING TO SILENCE ONE!!! The Law Won't Let Him



By *TMZ STAFF*

Published April 4, 2025 7:49 AM PDT | Updated April 4, 2025 1:23 PM PDT



Getty

UPDATE

12:56 PM PT -- **Bryan Freedman** tells TMZ ... "This convoluted statement makes it abundantly clear that Ms. Lively and team are rattled and once again resorting to making inflammatory remarks to steer focus away from the actual facts. Clearly they want to divert the public's attention from the receipts, the actual documents, video footage and additional evidence shown that make it irrefutable that there was no sexual harassment.

It's also surprising that Ms. Lively and her team are suddenly speaking so passionately about the hard won rights of the survivor community, considering she sidestepped this topic for the entirety of the film campaign, focusing instead on her hair care and alcohol products which at that time caused the organic backlash that she received. She does not need discovery to find out who smeared her. Just a mirror will do."

Blake Lively is outraged by **Justin Baldoni**'s latest declaration in their bombastic PR war, claiming her former costar thinks sexual harassment victims should NOT be protected under the law.

Here's the deal ... late Thursday, the "It Ends With Us" director **clapped back** at Blake's attempt to get his lawsuit against her thrown out ... opposing her motion on the grounds she allegedly orchestrated, participated in and directed a smear campaign "designed to ruin the reputations and careers" of his production company.



TMZ.com

His attorney also invoked Justin's First Amendment right to drag her into court for making false accusations about him.



Now, Blake's legal team -- attorneys **Mike Gottlieb** and **Esra Hudson** -- tells TMZ ... "That's right: Justin Baldoni, the man who has built his brand on supposedly speaking up for victims, believes that the First Amendment rights of victims of sexual assault and harassment to speak out should give way to the rights of perpetrators to sue their victims 'into oblivion.'"



Everett Collection

They add, Justin and his lawyer **Bryan Freedman** are so "hell bent" on destroying Blake ... they're trying to "shed" a law meant to protect victims and send a chilling effect to others from speaking out.

Freedman, of course, sees it exactly the opposite way, telling us ... "Ms. Lively and her circle of Hollywood elites cannot prevent my clients from exercising their constitutional right to petition the court to clear their names from her false and harmful claims."

Bottom line ... neither side is backing down, and both believe they're not only defending themselves, but the Constitution itself.

EXHIBIT H



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Justin Baldoni Files Response to Blake Lively's Motion to Dismiss His Countersuit: 'We Will Continue to Fight,' Lawyer Says

Lively's attorneys filed a motion to dismiss Baldoni's defamation lawsuit last month

By [Charmaine Patterson](#) | Updated on April 4, 2025 10:49AM EDT

 10 COMMENTS



Blake Lively, Justin Baldoni.
Credit : Gotham/WireImage (2)

[Justin Baldoni](#) has filed a response to [Blake Lively](#)'s motion to dismiss his \$400 million lawsuit against her.

[Baldoni sued Lively for defamation](#) and other claims on Jan. 16, about a month after [Lively filed a lawsuit](#) that accused Baldoni of sexual harassment and orchestrating a retaliatory smear campaign over their [behind-the-scenes fallout](#) while filming [It Ends with Us](#). The movie, which was released in theaters on Aug. 9, 2024, starred Lively and Baldoni, who also directed. The actor's lawsuit also named Lively's husband, [Ryan Reynolds](#).

Lively's lawyers, Mike Gottlieb and Esra Hudson, [filed the motion to dismiss on March 20](#), calling Baldoni's claims "vengeful and rambling" and an abuse of the legal system. Specifically, they said the newly enacted California Civil Code Section 47.1 prohibits retaliatory lawsuits tied to public disclosures of sexual harassment.

Baldoni's attorney, Bryan Freedman, responded to the motion in the Southern District of New York on Thursday, April 3, per court documents obtained by PEOPLE.

RELATED: [Justin Baldoni Blasts Ryan Reynolds for Attempt to Dismiss Lawsuit, Calls Him Blake Lively's 'Co-Conspirator'](#)



Blake Lively; Justin Baldoni.

Credit: SUZANNE CORDEIRO/AFP via Getty; Araya Doheny/Variety via Getty

Freedman states that Lively requested to dismiss the lawsuit for "failure to state a claim." She also asked for attorneys' fees, costs, damages and punitive damages.

However, Freedman says Baldoni's complaint provides details of "Lively's calculated efforts first to extort and manipulate" Baldoni and his Wayfarer Studios production team, "into ceding total control over the film *It Ends with Us* and then to defame and scapegoat them when her plan backfired."

They add that Baldoni's complaint provides specific claims of defamation against Lively that are "sufficient to defeat dismissal." Baldoni's attorney also claims that, even if a dismissal is granted, Lively is not owed attorneys' fees and damages.

The response alleges Blake's attempt to dismiss Baldoni's lawsuit is her way of asking the court "to find that she is immune from *any* culpability for her wrongful acts."

Addressing California Civil Code Section 47.1, Freedman says enforcing it would require the court to determine "that she acted alone and without malice and that she had a reasonable basis for her claims."

RELATED: ['Blake Lively Has the Stronger Case.' Lawyer Explains Potential Flaw in Justin Baldoni's Arguments](#)



Justin Baldoni on Aug. 6, 2024.
Credit: John Nacion/Variety via Getty

"Ms. Lively and her circle of Hollywood elites cannot prevent my clients from exercising their constitutional right to petition the court to clear their names from her false and harmful claims," Baldoni's attorney Bryan Freedman tells PEOPLE in a statement on Thursday.

He added of Lively's motion to dismiss: "What Ms. Lively is attempting to do is to set a dangerous precedent by barring the courthouse doors to my clients and punishing them for having their day in court, a right protected by the First Amendment."

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"This right protects not only Mr. Baldoni and the Wayfarer parties in this particular case, but all Americans in the future who have false accusations levied against them and seek relief from our justice system," Freedman continues. "This must stop here, and we will continue to fight against this blatant attempt to block access to the court system and to weaken our nation's Constitution to serve those who are in the position of power."

Reacting to the filing, Lively's attorneys Gottlieb and Hudson claim in an April 4 statement that Baldoni and the Wayfarer parties "are now arguing that nobody should be protected by the sexual harassment privilege. They're not just saying that it doesn't apply to Ms. Lively – they're saying it's unconstitutional and no woman should ever have these protections."

"That's right," they add, "Justin Baldoni, the man who has built his brand on supposedly speaking up for victims, believes that the First Amendment rights of victims of sexual assault and harassment to speak out should give way to the rights of perpetrators to sue their victims 'into oblivion.' These defendants are so hell bent on trying to destroy Blake Lively that they are willing to shred a law designed to protect all victims just to make sure they 'bury' one."


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EXHIBIT I



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Justin Baldoni's Lawyer Wants to Sell Tickets to Blake Lively's Deposition for This Reason (Exclusive)

Justin Baldoni's lawyer Bryan Freedman tells PEOPLE his client plans to take the stand in the upcoming trial

By [Elizabeth Rosner](#) | Published on May 8, 2025 05:06PM EDT

 **328** COMMENTS



Blake Lively at the 13th Annual LACMA Art + Film Gala on November 2, 2024 in Los Angeles ;Â Â Justin Baldoni attends Variety Faith And Spirituality In Entertainment Honors on December 04, 2024 in Los Angeles.

Credit : Image Press Agency/NurPhoto/Shutterstock ; Araya Doheny/Variety via Getty

NEED TO KNOW

- **Justin Baldoni's lawyer Bryan Freedman tells PEOPLE he wants Blake Lively to give her deposition on a livestream and sell tickets for people to watch**
- **Lively's lawyer Mike Gottlieb confirmed to PEOPLE that the actress will testify at trial**
- **The *It Ends With Us* legal battle is scheduled for trial in March 2026**

[Justin Baldoni](#)'s legal team is proposing an unconventional — and highly public — setting for [Blake Lively](#)'s upcoming deposition: Madison Square Garden.

"Since Ms. Lively is open to testifying, let's make it count," Baldoni's attorney Bryan Freedman tells PEOPLE. "Hold the deposition at MSG, sell tickets or stream it, and donate every dollar to organizations helping victims of domestic abuse."

Freedman also confirmed that Baldoni, 41, will take the stand at the eventual trial, which is scheduled for March 2026 and will not have cameras present inside. "Justin will be testifying," he says.

[In an exclusive interview with PEOPLE](#), Lively's attorney Mike Gottlieb confirmed the actress, 37, will also testify. In response to that confirmation, Freedman says, "She has been testifying since the moment she auditioned for this part. And if she is suddenly now willing to sit for a deposition, I am available. How does tomorrow morning work for her?"

Gottlieb also said, "In discovery they'll have an opportunity to ask Ms. Lively questions and depositions. Likewise, we will have the opportunity to take the depositions of the defendants," including Baldoni.



Blake Lively speaks at 2025 TIME100 GALA.
Credit: Kevin Mazur/Getty

Freedman went on to criticize Lively's conduct and public positioning, accusing her of leveraging her celebrity network to shape the narrative.

"Although obviously uncomfortable for the Lively parties, the truth is not a distraction. The truth has been clearly shown through unedited receipts, documents and real-life footage. More to come," he says. "Blake was the one who brought her high-profile friends into this situation without concern for their own personal or public backlash. As the truth shows, she used her 'dragons' to manipulate Justin at every turn."



Justin Baldoni on Aug. 6, 2024.
Credit: John Nacion/Variety via Getty

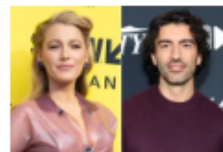
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As the legal battle heads toward trial, both sides are preparing their cases. “There are others who witnessed or experienced misconduct,” Gottlieb said. “We expect their accounts — especially about what happened on set — to come out live.”

Gottlieb also criticized what he called a “media circus” strategy by the defense, which has floated celebrity subpoenas. “This is a case about what happened to Blake Lively when she raised claims of sexual harassment on the set. It’s not a case about how songs were chosen for the movie. It’s not a case about fictional Marvel characters in *Deadpool* movies.”

RELATED STORIES

Blake Lively’s Lawyer Speaks Out in First Interview, Reveals Actress Will Testify in Justin Baldoni Trial (Exclusive)



Justin Baldoni’s Wayfarer Foundation Is Shutting Down amid His Legal Woes with Blake Lively



The case stems from [*It Ends With Us*](#), filmed in 2024. In December, Lively [sued for alleged sexual harassment and retaliation](#). [Baldoni denied the claims and filed a \\$400 million countersuit](#) against Lively, [Ryan Reynolds](#) and others, alleging defamation and civil extortion.

Lively moved to [dismiss the countersuit](#), calling it “vengeful,” while Baldoni’s team called her motion “abhorrent.” His attorneys have said they plan to hold Lively “accountable for her actions of pure malice, which include falsely accusing my clients of harassment and retaliation.”

LEAVE A COMMENT ↓

EXHIBIT J

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<p style="text-align: right;">Page 2</p> <p>1 CHARLES LATIBEAUDIERE: Welcome to TMZ 2 Live. Charles here. 3 ELEX MICHAELSON: I'm Elex Michaelson 4 from Fox 11 Los Angeles filling in for Harvey. 5 CHARLES LATIBEAUDIERE: Thanks for 6 being here. We told you the big news yesterday, 7 the shocking news in the Justin Baldoni/Blake 8 Lively war, that a judge had dismissed most of -- 9 and the biggest part -- the defamation 10 allegation, the defamation case that Justin had 11 filed against Blake. And last night, she was 12 taking what I'm sure she felt was, like, a 13 victory lap. She was out at an event in Tribeca 14 last night in New York City, all smiles. 15 ELEX MICHAELSON: Big smiles. 16 CHARLES LATIBEAUDIERE: Why not, 17 because she came out on top, right? 18 ELEX MICHAELSON: Maybe not. 19 CHARLES LATIBEAUDIERE: Maybe not. 20 And, in fact, Justin Baldoni is saying that this 21 is far from over. Now, we're going to have his 22 attorney with us in just a moment, but here's 23 what Blake had to say after the judge's decision. 24 She said, "I've felt the pain of retaliatory 25 lawsuit, including the manufactured shame that</p>	<p style="text-align: right;">Page 4</p> <p>1 complaint and then, you know, walked over and 2 filed a lawsuit which, you know, accused some 3 very good people of a smear campaign and accused, 4 you know, a terrific young man of sexual 5 harassment, both of which were completely untrue. 6 And that's where the case got started, it's where 7 the case stands today. 8 Those claims that she brought exist; 9 that's where we want our win. From day one where 10 we've wanted our win, in addition to getting 11 damages, but we wanted our win is to show there 12 was no smear campaign and there's no sexual 13 harassment and she hasn't proved a thing. As a 14 matter of fact, it's just the opposite. Look at 15 the facts, look at what's been shown, look at the 16 receipts, look at the video. 17 ELEX MICHAELSON: What's next for you? 18 BRYAN FREEDMAN: I mean, next for us is 19 I'm really hoping that she doesn't drop her 20 lawsuit because, you know, going on her false 21 victory. 22 CHARLES LATIBEAUDIERE: Why would she? 23 BRYAN FREEDMAN: Because she's on a 24 false victory tour and she's afraid of the truth. 25 And the truth is, you know, going to be shown</p>
<p style="text-align: right;">Page 3</p> <p>1 tries to break us. While the suit against me was 2 defeated, so many don't have the resources to 3 fight back." 4 ELEX MICHAELSON: Trying to make a 5 bigger picture thing so that more people can 6 relate to her. 7 CHARLES LATIBEAUDIERE: Clearly feeling 8 victorious. Justin Baldoni's attorney, Bryan 9 Freedman, says this is a long way from over and 10 that they are planning to continue this fight, 11 and he is joining us right now to explain how 12 they're going to move forward. Bryan, welcome 13 back to TMZ Live. 14 BRYAN FREEDMAN: Thanks, nice to be 15 here. 16 CHARLES LATIBEAUDIERE: So what was 17 your reaction to the judge's decision yesterday 18 to dismiss the biggest one being the defamation 19 claim? 20 BRYAN FREEDMAN: Well, you know, we 21 weren't pleased that the judge dismissed the 22 defamation claim, but it didn't -- you know, 23 overall, it's not what the case is about. I 24 mean, let's remember where we got started here. 25 We got started because Blake Lively filed a CRD</p>	<p style="text-align: right;">Page 5</p> <p>1 through depositions, which is what's going to be 2 next. I've noticed her deposition. It's set in 3 June. We're going to see if she's going to 4 appear at that deposition or not. And we're 5 going to proceed forward with the case and we're 6 going to show that there was no sexual harassment 7 and we're going to show that there was no smear 8 campaign and it's really just that simple. 9 And, you know, it's unfortunate to be 10 wrongfully accused here and some really good 11 people at some really good PR firms, people that 12 aren't even the face of anything that have been 13 accused of horrible things and Justin has been 14 accused of horrible things and Jamie has been 15 accused of sex harassment and it's just not true 16 and we're going to prove that. 17 CHARLES LATIBEAUDIERE: So, Bryan, what 18 you're talking about is your plan is to go 19 forward and win against -- Blake has filed her 20 lawsuit and you're just talking about fighting 21 that lawsuit, fighting the allegations that she 22 has made, but are you talking about re-filing any 23 of the claims that Justin made? Obviously, the 24 defamation was dismissed with prejudice, so you 25 can't refile that. But do you plan to refile any</p>

<p style="text-align: right;">Page 6</p> <p>1 of the other -- I think there are three other 2 claims that you could refile, correct? 3 BRYAN FREEDMAN: There's actually four 4 and the judge was very specific about them: 5 intentional interference with contract against 6 Blake and Ryan; intentional interference with 7 prospective economic advantage, that exists still 8 and that's against Blake and Ryan; negligent 9 interference with a prospective economic 10 advantage, that's against Blake and Ryan; and 11 breach of the implied duty of covenant of good 12 faith and fair dealing and those are -- you know, 13 that's against Blake. And those claims still 14 exist. The judge just wants us to re-plead them 15 and gave us a roadmap on how to do that. 16 CHARLES LATIBEAUDIERE: Will you do 17 that? 18 BRYAN FREEDMAN: Of course, we'll do 19 that. I mean, you know, for sure. And, you 20 know, as part of doing that also, we're also 21 going to fight her claims, you know, which have 22 existed since the beginning here. And there's 23 been absolutely no indication of any kind that 24 she's prevailing on her claims; as a matter of 25 fact, just the opposite if you look at the facts</p>	<p style="text-align: right;">Page 8</p> <p>1 to have Justin's name cleared in court and it's 2 important for you for all this stuff to go 3 forward. 4 BRYAN FREEDMAN: It's not just 5 important for me to have Justin's name cleared in 6 court. It's important for me to have Tag and Jen 7 Abel's names cleared in court. It's important 8 for me to show the truth and to give the clients 9 the real, you know, result that they're looking 10 for, which is essentially is what they were 11 accused of, right. There was not sexual 12 harassment here, she wasn't sexually harassed and 13 there's no smear campaign. 14 CHARLES LATIBEAUDIERE: What the judge 15 essentially said though, Bryan, was that she made 16 those allegations in legal documents and, 17 therefore, there is no defamation in this "New 18 York Times" article. I'm wondering what Justin's 19 reaction was to the judge's decision because, 20 really, the judge said, you know, you accused her 21 of cherry picking of the "New York Times" of 22 cherry picking certain things from her lawsuit 23 and placing them in this story. And the judge 24 said there's nothing wrong with that; that's good 25 journalism. So I'm wondering what Justin's</p>
<p style="text-align: right;">Page 7</p> <p>1 and the evidence that we've seen in the public. 2 ELEX MICHAELSON: So you mentioned in 3 June her deposition. What's your strategy for 4 that? What's the key question you want to get 5 her under oath on? 6 BRYAN FREEDMAN: State your name. I 7 want to see if she shows up. 8 ELEX MICHAELSON: And once she does, 9 what do you do after that? 10 BRYAN FREEDMAN: I'm going to ask her 11 questions under penalty of perjury and she's 12 going to have to provide evidence and she's going 13 to have to provide the truth of the stories. And 14 we have all the videotape, we have all the 15 footage, we have the text messages and we have 16 emails and we're going to see how consistent her 17 testimony is with the actual facts of what 18 transpired. If it's shown to date so far what 19 she's said and what she's put in court pleadings, 20 it doesn't seem like her testimony is going to be 21 all that consistent. 22 ELEX MICHAELSON: So it sounds like 23 what you're -- that you are explicitly saying, 24 you don't want everything to go away. You don't 25 want to just say we're done with this. You want</p>	<p style="text-align: right;">Page 9</p> <p>1 reaction was to the judge's decision. 2 BRYAN FREEDMAN: Well, I don't know 3 that the judge said there's nothing wrong with 4 that, it's good journalism. I think what the 5 judge said is this all came from the CRD 6 complaint and the CRD complaint is a privileged 7 document and, therefore, you can't allege 8 defamation based on a privileged document, and I 9 think that's where the judge, you know, came 10 from. 11 What was Justin's reaction to it? The 12 same as my reaction to it, which is, you know, 13 it's not fair, it's not right, and the reality is 14 that someone should have a chance to be able to 15 be held accountable, and you should be able to 16 hold media accountable for the truth and veracity 17 -- or the lack of it -- of what they show. And, 18 you know, whether or not something, you know, was 19 cherry picked from text messages or not isn't 20 really the issue as much as whether something was 21 truthful or not, and the truth is what the "New 22 York Times" said, how they obtained the 23 information. 24 And, frankly, the case that Blake 25 Lively has been putting on since the beginning</p>

<p style="text-align: right;">Page 10</p> <p>1 that there's sexual harassment and there's a 2 smear campaign is just completely wrong. 3 ELEX MICHAELSON: What's Justin's head 4 space right now? 5 BRYAN FREEDMAN: I think that he's a 6 person who wants to be vindicated and that's all 7 that he cares about is that he knows who he is, 8 he knows what he's done, he knows what he hasn't 9 done, and he wants the truth to come out and he 10 wants to do that in the appropriate way. He's 11 not walking around taking victory laps and 12 victory tours, you know, and speaking out. He's 13 taking care of his family and taking care of his 14 loved ones and he's waiting for his day in court 15 where he can speak out and tell the truth. 16 CHARLES LATIBEAUDIERE: All right. 17 Well, a lot of people thought that maybe this 18 whole thing was coming to a close. Clearly, it 19 is not. Bryan, I'm sure we'll be talking to you 20 as this moves forward. Thank you for being with 21 us. 22 BRYAN FREEDMAN: I mean, this is so far 23 from over, let's just put it that way, so far. 24 CHARLES LATIBEAUDIERE: I heard what 25 you said loud and clear. We will talk to you</p>	<p style="text-align: right;">Page 12</p> <p style="text-align: center;">C E R T I F I C A T I O N</p> <p>1 2 3 I, Sonya Ledanski Hyde, certify that the 4 foregoing transcript is a true and accurate 5 record of the proceedings. 6 7 8 <i>Sonya M. Ledanski Hyde</i> 9 _____ 10 11 Veritext Legal Solutions 12 330 Old Country Road 13 Suite 300 14 Mineola, NY 11501 15 16 Date: July 15, 2025 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 11</p> <p>1 soon. 2 BRYAN FREEDMAN: Thank you. 3 CHARLES LATIBEAUDIERE: All right. 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	

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<p style="text-align: right;">Page 2</p> <p>1 MEGYN KELLY: Hey everyone, I'm Megyn 2 Kelly. Welcome to the Megyn Kelly Show. Well, 3 no sooner did we wrap our individual take on what 4 happened in Baldoni v. Lively, than my friend and 5 lawyer, Bryan Freedman and I, managed to connect. 6 And he's got all sorts of thoughts on what 7 actually went down with this judge dismissing 8 part of his counterclaims, and agreed to come on 9 the show. 10 So, here I am, live from my European 11 vacation, back with Bryan Freedman, to bring you 12 the story straight from the source's mouth. 13 There's no one better to talk to about what 14 actually happened here, than the man who 15 represents Justin Baldoni, and who's been out 16 there fiercely defending him and waging war 17 against Blake Lively, who he believes is not a 18 good person, and does not believe her claims. 19 Don't miss a moment. Subscribe to this 20 show on YouTube and follow me on Insta, Facebook, 21 and X. 22 The human body is incredible; capable 23 of repair and growth that amazes scientists, even 24 in 2025. But as the years pass, natural healing 25 and building processes slow down. While this is</p>	<p style="text-align: right;">Page 4</p> <p>1 couple. 2 BRYAN FREEDMAN: Sure. First of all, 3 great to see you. And sorry to interrupt your 4 vacation. I hope you're having a great time. 5 MEGYN KELLY: So far, so good. 6 BRYAN FREEDMAN: And the last time -- 7 thanks -- the last time I was with you, actually, 8 was the last kind of disaster in LA, which were 9 the LA fires. 10 MEGYN KELLY: Yeah. 11 BRYAN FREEDMAN: I think it was March 12 7th and we were on together, you know. So, you 13 know, yet another, you know, crisis in LA. And 14 I'm here. So, I don't think there's any 15 coincidence. 16 But my take on what the judge did was 17 the judge simplified things. And, you know, 18 while, you know, we're not pleased that he got 19 rid of the defamation causes of action, you know, 20 the truth was, the case was never really about, 21 you know, defamation. 22 And while it's in our, while it's our 23 response and it's, while it's a portion of our 24 claims, you know, from the very start, this case 25 was about somebody being wrongfully accused, and</p>
<p style="text-align: right;">Page 3</p> <p>1 normal, there is a way to support your body. A 2 collagen supplement from Ancient Nutrition can 3 help you look and feel your best. For centuries 4 people have searched for a mythical fountain of 5 youth. Spoiler alert, it does not exist. 6 However, collagen is a proven way to promote 7 youthful health and appearance. 8 And that's why I want to tell you about 9 Ancient Nutrition's multi-collagen Advanced Lean. 10 Ancient Nutrition combines ancient wisdom with 11 modern science to create high quality 12 supplements. It's delicious and easy to 13 incorporate into daily routines. You can mix it 14 into your coffee, your matcha, or your smoothies. 15 Right now enjoy 25 percent off your first order 16 at AncientNutrition.com/Megyn. That's 17 AncientNutrition.com/Megyn for 25 percent off. 18 Support your body and feel your best with Ancient 19 Nutrition. 20 Bryan, great to see you. Thanks for 21 doing this. All right. So, give us your overall 22 take on this Federal District Court judge 23 dismissing large portions of your counterclaims 24 against Blake Lively, Ryan Reynolds, The New Yor 25 Times, and this PR agent who represented the</p>	<p style="text-align: right;">Page 5</p> <p>1 that's Justin. And it's also been about Melissa 2 Nathan and her team at TAG, and about Jenn Abel 3 and herself, and about her being wrongfully 4 accused about a smear campaign. 5 And when the reality is, you know, when 6 you -- you know, what I believe is going on is 7 that the judge, you know, is getting through all 8 of this and saying, hey, we're going to parrot 9 this down to really what the issues are in the 10 case. And I don't want collateral stuff going 11 on, I just want, you know, answers to the key 12 questions, right. Was there sexual harassment? 13 You know, clearly, no. And, you know, was there 14 a smear campaign? And that's no also. 15 So, that's what I really think, when 16 you pare it down, the law and all of that, to 17 what the judge is trying to do here. 18 MEGYN KELLY: What do you make of the 19 victory lap she and her lawyers are taking, 20 claiming absolute vindication, calling the 21 counterclaims basically a sham, saying the judge 22 saw right through them, and Blake Lively out 23 there thanking the 19 organizations who filed 24 briefs on her behalf? 25 BRYAN FREEDMAN: Right. Well, you</p>

<p style="text-align: right;">Page 6</p> <p>1 know, without getting into detail on that -- I 2 mean, first of all, the judge made clear that he 3 didn't read the briefs. The judge made clear 4 that he didn't rule on 47.1, which she's going 5 around and celebrating a victory on, which is -- 6 MEGYN KELLY: Let's explain what that 7 is. 8 BRYAN FREEDMAN: 47.1 was the, was the 9 California statute that is a new statute that she 10 took the position that you couldn't defend 11 yourself by filing a claim against an accuser 12 concerning sexual harassment or sexual assault 13 which, you know, in most cases is a really 14 important law, in most cases is a really 15 important conceptual case, and it really protects 16 the victims. 17 But you know, you got to ask yourself 18 here, who's the real victim? The real victim is 19 Justin and the others. And it's because they've 20 been wrongfully accused. And ask yourself, you 21 know, when you've been in a situation where 22 you've been wrongfully accused, you know, how do 23 you defend yourself? Are you allowed to defend 24 yourself? Are you allowed to lead with truth? 25 Because that's all that's been done here, is</p>	<p style="text-align: right;">Page 8</p> <p>1 Saturday Night Live tours. It hasn't been about 2 the People 100, you know, or the Time 100. You 3 know, it hasn't been about the show, and it 4 hasn't been about, you know, the 5 misrepresentations. It's been about the facts. 6 You know, we've been in this case for a while 7 now. You know, have we seen, you know, text 8 messages? Have we seen evidence? Have we seen 9 receipts? No. You know, you've only seen them 10 from one side and it's been out there. And what 11 we've seen from Blake Lively is her showing, you 12 know, who she really is. And the truth is, you 13 know, that -- there's a famous quote that says, 14 when people show you who they are, believe them. 15 MEGYN KELLY: Maya Angelou. Yeah. So, 16 what did you make of the judge? Because you say 17 it's clear he didn't read the briefs. I have to 18 say, I was surprised at some of the sweeping 19 language in there. For example, him saying, 20 well, Justin Baldoni, you can't really sue, he 21 can't sue Ryan Reynolds for defamation because 22 when you sue a public figure, when you are a 23 public figure suing for defamation, you have to 24 meet The New York Times v. Sullivan standard, 25 showing that the person who defamed you did it</p>
<p style="text-align: right;">Page 7</p> <p>1 putting everything out in a website, putting 2 everything out for the public, not hiding 3 anything, and saying, here it is. Was there 4 sexual harassment? Was there a smear campaign? 5 MEGYN KELLY: And 47.1 seems to say, 6 this new California law, if you're an alleged 7 sexual harassment or sexual assault, or hostile 8 work environment plaintiff, and somebody who 9 you've accused, comes back at you saying, I 10 didn't do it and what you're alleging is 11 defamatory of me; thanks to this statute, that 12 person defending themselves, saying I didn't and 13 what you say is defamation, can get in a lot of 14 trouble, potentially; could have to pay that 15 person's legal fees if the counterclaim gets 16 dismissed; could have to pay triple the legal 17 fees, potentially, and punitive damages. So the 18 California statute almost makes it like extremely 19 dangerous for someone in Justin Baldoni's 20 position, to actually defend himself against a 21 sexual harassment complaint. 22 BRYAN FREEDMAN: Well, it's not 23 dangerous if you know you're right. So, this 24 case has always been about facts. It hasn't been 25 about victory laps. It hasn't been about</p>	<p style="text-align: right;">Page 9</p> <p>1 with actual malice; meaning they knew it was 2 false when they said it -- this would be Ryan 3 Reynolds saying false things to WME, the agency, 4 that he got to break up with Justin. So, he knew 5 that things were false, or he behaved with 6 reckless disregard for their falsity. 7 And the judge seemed to say, eh, 8 anything he heard was from his wife, so he 9 couldn't have known it was false. Worst case 10 scenario, he was mistaken and, therefore, your 11 claims against Justin need to be dismissed, 12 though a couple of those have been granted leave 13 to refile. 14 I just don't understand that, because 15 there is evidence that Ryan Reynolds had direct 16 interactions with Justin, with Blake, with Taylor 17 Swift. I don't get that part, Bryan. 18 BRYAN FREEDMAN: Yeah, well, you know, 19 I think it's a nuance in the law that you're 20 aware of, but you know, public figures who sue 21 for defamation have to prove malice. What the 22 judge, essentially said, as you read the order, 23 is that, you know, there can be no malice here 24 because the allegations arose from the CRD 25 complaint, which is a protected, you know,</p>

<p style="text-align: right;">Page 10</p> <p>1 document, as a legally-filed document. 2 MEGYN KELLY: The civil rights 3 complaint that she filed to kick this whole thing 4 off, and then leaked to The New York Times, 5 clearly. Go ahead. 6 BRYAN FREEDMAN: That's right. And we 7 don't agree with that at all. We think there's 8 so much collateral action that happened here 9 factually, that is outside of the scope of that 10 document itself. You know, for example, The New 11 York Times said, you know, that they reviewed 12 thousands of text messages and made their own 13 determination based on that. They had a video 14 that they put together. These things are not 15 directly taken from the CRD complaint. 16 And you know, and the court, you know, 17 addressed that in its own way. And, you know, 18 the court, you know, the court was very matter of 19 fact about that. I don't think the, you know, 20 generally, judges or courts like when media is 21 sued. They certainly don't like when, you know, 22 public figures sue for defamation; the standard 23 is higher, it does require malice. I think, in 24 this case, there's a lot of arguments on why 25 there is malice.</p>	<p style="text-align: right;">Page 12</p> <p>1 BRYAN FREEDMAN: Well, you know, I'm 2 not at liberty to talk about his finances. But 3 suffice it to say that I doubt many people have 4 that kind of money. But you know, but I think 5 the, you know, the distinction in this case is 6 that sometimes the law does not, you know, take 7 into account morality. And you know, while this 8 particular statute is a good statue in cases 9 where it's important and it matters, and where 10 there's someone who's bullying the victim. And I 11 want to take that really seriously because I 12 think it's really important, and Justin feels 13 it's really important. 14 But where it doesn't apply, is a case 15 where somebody has created allegations that do 16 not rise to the level of sexual harassment. And 17 we now know exactly what those allegations are. 18 You know, we have a specific understanding of 19 what those allegations are. We've seen video 20 that shows exactly what happened in the scene 21 that she said was so inappropriate. And we've 22 seen, you know, the text messages about come into 23 my trailer. We've seen evidence that directly 24 refutes the allegations of sexual harassment. 25 So, in this case, you know, from our</p>
<p style="text-align: right;">Page 11</p> <p>1 But again, I get back to, why are we 2 here? And what are we really, you know, proving 3 here? And the truth is, it's two things. It's, 4 did he sexually harass her? And is, you know, 5 was there a smear campaign. And again, you know, 6 we -- it's a bummer. And you know, and I feel 7 really upset about the fact that, you know, 8 compensation in the form of damages as a result 9 of defamation, is not possible at the moment for 10 him. I'm sure, you know, they will both say 11 things in the future that will bring this back to 12 life. I have no doubt. 13 MEGYN KELLY: Right. Can I ask you 14 about -- you mentioned 47.1, this law in 15 California that kind of protects someone even 16 alleging sexual harassment from getting sued for 17 defamation. In other words, if the defamation 18 case is dismissed, it gives them potentially 19 triple their attorneys' fees and costs. That 20 could be millions and millions of dollars if the 21 judge says it applies and Justin has to pay, 22 before we ever even get to discovery in this 23 case, Bryan. Does he have that kind of money? 24 And what are the odds that the judge is going to 25 impose that hefty penalty on him?</p>	<p style="text-align: right;">Page 13</p> <p>1 perspective, there's not nearly the risk that 2 there would be in a case where it was used for 3 bullying. In this case, it's truly about trying 4 to prove that you didn't sexually harass someone. 5 And why, with his career destroyed at the moment, 6 why is he not allowed that right to defend 7 himself and to be able to say this is not okay? 8 MEGYN KELLY: Does the judge get to 9 take any of that into account? Because she's 10 moving. She's, her team has made clear they're 11 going to move to get all of her fees behind this 12 motion to dismiss recovered from Justin. And I'm 13 sure they're going to ask for them to be trebled, 14 or tripled, and possibly punitive damages, which 15 just seems insane to me. But will the judge be 16 able to consider what we know to be the evidence 17 in the case, just from all you've done, even pre- 18 discovery, to put together what really happened 19 here? Does he get to even consider any of that? 20 Or do you actually think there's a real shot 21 Justin could be on the hook for this woman's 22 attorneys' fees times three? 23 BRYAN FREEDMAN: Well, I think the 24 judge has to look at the statute, which is a 25 brand-new statute, which there's absolutely no</p>

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<p style="text-align: right;">Page 14</p> <p>1 case law on, which hasn't been challenged at all. 2 And the judge is either going to or not going to 3 make a determination as to whether it applied or 4 not. So far in the ruling, the judge 5 specifically said that he did not take that 6 statute into consideration. But he did, you 7 know, welcome the parties to file, you know, 8 briefs on trying to recover their attorneys' 9 fees, including using 47.1 as an argument. I 10 believe, because the ruling wasn't a part of 11 that, and the judge didn't rule on it, it's moot, 12 and it doesn't apply. 13 But you know, there's a chance that the 14 judge could consider that. I think it's also a 15 statute that's completely untested. And we have 16 to ask ourselves, where there are good laws that 17 help to protect good people, when does it go too 18 far that your constitutional rights are taken 19 away? And when does it go too far that they're 20 taken away in a way that punishes you so severely 21 for trying to defend yourself and saying this is 22 not okay, and this defames me? 23 MEGYN KELLY: Can you just speak to 24 what you think her strategy was here? I mean, 25 was it, I'll file this Civil Rights Division</p>	<p style="text-align: right;">Page 16</p> <p>1 And you know, generally videos don't like, right, 2 about how you behaved in the past. And they 3 pulled that information, they put that 4 information out; whether it was the Kjersti Flaa 5 video, or whether it was other videos; whether it 6 was the videos where she said, here's what I do, 7 I just, you know, misrepresent what I'm, you 8 know, I'm trying to get a role and then I take 9 over the film, you know, or any of that stuff. I 10 think that reporters and other people in the 11 media play that for people, and people had a 12 reaction to it. And there was an organic 13 response as a result of that. I think that was 14 too much for her. It was too much for her to 15 believe that somebody could actually not like 16 her, based on her own conduct. I think that was 17 something that she couldn't handle; whether 18 that's a, you know, whether that's an interesting 19 narcissism quality or otherwise I don't know, not 20 a doctor. 21 But I can tell you this. The result of 22 it was her scurrying around trying to blame 23 someone else for why her own behavior seemed to 24 be the cause of people not liking her. And that 25 spiraled into something that, you know, was</p>
<p style="text-align: right;">Page 15</p> <p>1 complaint, and then my allegations will be 2 protected, undermining any attempt to sue me for 3 potentially defamatory statements. And then I 4 will leak it to The New York Times so it will get 5 out there, and then everyone will know that I'm 6 the victim here; as opposed to the narrative that 7 existed prior to her filing that complaint, which 8 was, she seems like a real bitch and she is tone 9 deaf on domestic violence, and she seems to have 10 blown up her movie for no apparent reason. Those 11 were the buzz, that was part of the buzz going 12 around about her. She bullies reporters. That 13 was also part of it. 14 So, is that your theory of the case, 15 Bryan? That she launched this whole thing in her 16 own effort at PR spin and control? 17 BRYAN FREEDMAN: I believe what 18 happened in the case, and it's pretty clear, 19 right, is that, you know, press came out, which 20 was negative toward her. There was press that 21 came out that was negative toward Justin. But 22 you know, these, you know, whether it's internet 23 sleuths, who are amazing, or whether it's, you 24 know, amazing reporters, went back in time and 25 pulled videos and pulled, you know, information.</p>	<p style="text-align: right;">Page 17</p> <p>1 completely out of control. I mean when, ever, do 2 you see someone, you know, make a red carpet walk 3 and go out in the press and bring all of their 4 friends into this, and make this situation bigger 5 than what it is? Is this good for her? Is this 6 good for her career? Is this good for her 7 children? Is this good for her family? You 8 know, you have to ask yourself, at some point, 9 everybody has a part in it. Everybody has a part 10 in everything, right? Does she, is she, does 11 she, is she capable of taking responsibility for 12 her part in this and owning that? That's, we 13 haven't seen that yet. 14 And that's why, you know, that many 15 people out there are finding evidence about how 16 she's behaved, how she's treated reporters, how 17 she's treated people, how she's treated 18 individuals, how she's treated, you know, waiting 19 staff and others, and saying it's not okay, we 20 don't like you. 21 MEGYN KELLY: She's a bully, that's my 22 own conclusion. She's an obvious bully who can't 23 take any rounds of negative press, which is so 24 absurd. You and I both know that public figures, 25 may of whom you've defended, including yours</p>

<p style="text-align: right;">Page 18</p> <p>1 truly, have to take tons of negative press. And 2 it's just part of being a public figure. It's 3 not pleasant, but to try to ruin a man's life 4 over one mild round that she had to suffer when 5 this movie came out is just insane. That's, to 6 me, clear, clearly what she's doing. 7 Can I ask you about what remains? 8 Because my own take was, so the civil extortion 9 claim is gone, the defamation claim is gone, the 10 false light invasion of privacy claim -- 11 counterclaims, I should say -- by Justin against 12 her and the related parties, are gone. But 13 what's left? Because I heard you say it's four 14 claims. I thought it was just the tortious 15 interference and the breach of the covenant of 16 good faith and fair dealing, insofar as he's 17 alleging that Ryan Reynolds mess with his 18 relationship with Ari Emanuel over at WME, like 19 if that happened, and he interfered with Justin's 20 agency relationship, do you still have a claim? 21 Where am I wrong? How is it bigger? 22 BRYAN FREEDMAN: Well, it's bigger 23 because there's an intentional interference with 24 contract, which is against Blake and Ryan, that 25 the judge gave us a roadmap to re-plead. There</p>	<p style="text-align: right;">Page 20</p> <p>1 because that's the close of discovery of that 2 type. 3 MEGYN KELLY: Are you going to get Ryan 4 as well, Ryan Reynolds? 5 BRYAN FREEDMAN: We'll see. I mean, 6 you know, obviously, he's a defendant in the 7 case, so of course, we're going to notice his 8 deposition. And you know, and the judge has 9 clearly indicated that the judge would like to 10 limit discovery and limit the, you know, the 11 collateral issues in the case. We think there's 12 really important issues that there needs to be 13 discovery on. And those will be some of the 14 battles along the way that we will have. 15 But you know, there's no substitute for 16 the truth. And from the beginning, this has been 17 about facts, facts, facts, right. Put them out 18 there. Where is the evidence? Where are the 19 receipts. Put them out there so that people can 20 see the truth. This is about someone who's had 21 their career destroyed, and trying to build that 22 back. 23 MEGYN KELLY: How did Justin take the 24 news, Bryan? Having practiced law I know it's 25 never great when you get a decision like this</p>
<p style="text-align: right;">Page 19</p> <p>1 is intentional interference with perspective 2 economic advantage, and that goes beyond just a 3 contract; it goes to the heart of, you know, are 4 you going to be able to work again. There's 5 negligent interference with perspective economic 6 advantage against Blake and Ryan. And there's 7 something called breach of the implied covenant 8 of good faith and fair dealing, against Blake 9 only. And those claims, you know, are being re- 10 pled. The Judge, again, gave us roadmap on how 11 to re-plead those, and what the judge would like 12 to see. We are doing that now, and working 13 through that. And those are significant claims. 14 But nothing is as significant as taking her 15 deposition, going through that process, getting 16 the witness testimony and the witnesses deposed, 17 and going into the courtroom and showing the 18 truth, to show that there was no sexual 19 harassment. Nothing is more important than that. 20 MEGYN KELLY: And you think that 21 deposition could take place as early as when? 22 BRYAN FREEDMAN: It's been noticed in 23 June. We'll see, you know, when she actually 24 decides to appear. And you know, but I assume 25 that it will take place before August 15th,</p>	<p style="text-align: right;">Page 21</p> <p>1 one. How's he feeling? 2 BRYAN FREEDMAN: You know, I think that 3 injustice is a word I think I can best describe 4 it. A lack of understanding. If she said these 5 things about me that were untrue, how come I 6 don't have a legal redress in terms of 7 defamation? If this, you know, it's clear, you 8 know, the evidence is clear that they, you know, 9 secreted to get the, you know, information on 10 this Van Zam subpoena Vanzan subpoena and 11 created, you know, this whole Doe lawsuit, and 12 got that information so that no one could see it, 13 and then used that information so that they could 14 put together this hit piece in The New York 15 Times. And that was devastating for Justin. It 16 was, you know, if anybody remembers what December 17 21st was like for him, there was 100 percent of 18 the people saying he's a horrible person, and 19 zero percent -- well, except for me, who actually 20 saw him on a day-to-day basis, and his family -- 21 you know, who really were on his side. Until we 22 put out the facts, until we put out the receipts, 23 until we put out the documents -- you know, 24 because this has always been about facts and 25 truth. And it's, you know, it's frustrating for</p>

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<p style="text-align: right;">Page 22</p> <p>1 him, who knows exactly what he did and didn't do. 2 Did he acquiesce too much to her demands? 3 Absolutely, because he was afraid. But that's 4 very different than whether he sexually harassed 5 her. 6 MEGYN KELLY: Is his career in ruins? 7 Are he, are people not offering him jobs? Is he 8 not able to get funding for an additional 9 picture? 10 BRYAN FREEDMAN: You know, he's lost 11 jobs. It has affected his career at the moment. 12 It's obviously affected, you know, him 13 emotionally and his self-esteem and, you know, 14 and he's putting up the best face he can for his 15 family and what not. But all he wants is truly a 16 chance in a courtroom and a jury to be able to 17 tell his story to. You know, he's not going 18 around on red carpets. He's not going around, 19 you know, with interviews. He's not going around 20 on some victory tour, even when she dropped her 21 emotional distress claims, or were in the process 22 of dropping her emotional distress claims. And, 23 you know, they have an interesting ability to go 24 on victory tours whether they win or lose, so it 25 doesn't even matter. I could see her losing the</p>	<p style="text-align: right;">Page 24</p> <p>1 disposed of that is not going to let her get away 2 with keeping that sword hanging over Justin the 3 whole time, and also maintaining the position of, 4 you don't get to see a single record of me with 5 my therapist. 6 BRYAN FREEDMAN: Well, the great about 7 the law is, when you're the plaintiff, you have a 8 burden to prove your claims and to prove your 9 damages. And as part of that, anyone that claims 10 emotional distress is required to provide 11 evidence of that emotional distress. Apparently, 12 you know, she didn't think the law applied to 13 her, so she decided that she was not going to 14 provide that information. And, whether it existed 15 or not, she wasn't going to comply with that 16 rule. And you know, I think things are still 17 being worked out amongst it. But she, you know, 18 when she makes a decision like that, there are 19 consequences that attach to it. You can't just 20 decide that you're going to refile at a later 21 time. You can't just decide that, let me get 22 through this discovery phase and then I'll put 23 this back on. 24 MEGYN KELLY: Right, that's not how it 25 works.</p>
<p style="text-align: right;">Page 23</p> <p>1 case and going on a victory tour. But that's, 2 you know, that's what we're dealing with, right, 3 when people show you who they are, believe them. 4 And -- 5 MEGYN KELLY: When she -- 6 BRYAN FREEDMAN: (indiscernible) -- as 7 well. 8 MEGYN KELLY: She was, she's being 9 forced to drop her claims for intentional 10 infliction of emotional distress because she 11 refused to fork over her medical records when you 12 rightfully asked for them; any defense lawyer 13 would. If you're getting sued for that claim, 14 you say, okay, show me all your mental distress 15 evidence, including your psychiatric records and 16 anything else that would support this claim. And 17 as soon as you guys did that, she said never 18 mind, I'll withdraw the claims, but I want them 19 withdrawn without prejudice so I can file them at 20 any point in the future if I change my mind. 21 What did you make of how the judge 22 handled that? Because he seemed to say, you're 23 not getting away with that, sister, that's not 24 happening. He seemed to say, you guys come up 25 with an agreement on how this is going to get</p>	<p style="text-align: right;">Page 25</p> <p>1 BRYAN FREEDMAN: Right. The law is 2 supposed to apply to everyone equally. But you 3 know, some people believe it should not. 4 MEGYN KELLY: What's happening, to the 5 extent you can tell us, with Taylor Swift? 6 Because there was some reporting that you wanted 7 to get the text messages between Blake Lively and 8 Taylor, and that there was a potential for 9 subpoenaing Taylor Swift, in this case via 10 documents subpoenaed to get her texts, and 11 possibly even a deposition. And then, that her 12 father allegedly came to you and said, I will 13 tell you what's in the text, and the reason I'll 14 tell you is because Blake Lively is threatening 15 my daughter, Taylor Swift, that if she doesn't 16 speak out on Blake Lively's behalf, that Blake 17 Lively is going to retaliate in some way. So, 18 tell us what you can. 19 BRYAN FREEDMAN: Sure. Just out of 20 respect for, you know, people that aren't parties 21 to the lawsuit, there's not a whole lot that I 22 can get into. But you know, I think that people 23 who are relevant to the case, and people who, you 24 know, have otherwise been with people from the 25 beginning of the case, side by side, shoulder by</p>

<p style="text-align: right;">Page 26</p> <p>1 shoulder, you know, are potentially witnesses in 2 the case. And so, you know, those are things 3 that we need to look into. Those are things to 4 see, you know, what, in addition to what we know 5 already we need, and then to move forward and 6 obtain that discovery. There's a short leash on 7 how far we can go with discovery. I think the 8 judge has made it very clear that, you know, 9 third parties need to be directly relevant to 10 claims. And we think certain third parties are 11 directly relevant. But it's just whether or not 12 you need that evidence in addition to what you 13 have already.</p> <p>14 MEGYN KELLY: Are you able to say 15 whether you believe, or have reason to allege 16 that Blake Lively threatened Taylor Swift if she 17 did not come out and speak on Blake's behalf.</p> <p>18 BRYAN FREEDMAN: The truth is, I don't 19 think I should speak on it. I think we should 20 wait and see, you know, how the evidence, you 21 know, ferrets out on that. I think, you know, 22 look, I think we've all, you know, those who have 23 looked at the timeline, those who have looked at 24 all of the documents that have been put forth -- 25 there's more video evidence. I mean, there's</p>	<p style="text-align: right;">Page 28</p> <p>1 on the truth and the real facts of what happened. 2 I mean, there's real time evidence in this case. 3 I mean, you heard Just in on the voicemail. You 4 heard what he was going through. You know, we've 5 seen the birthing video, right, the screenshot 6 that Jamie showed, you know, to Blake and didn't 7 even play the video. I mean, it's there. Like, 8 that's not pornography. You know, when you, you 9 know, famous Supreme Court, you know, justice 10 said, you know, you'll know pornography when you 11 see it. I don't think a birthing scene where no 12 one is unclothed is pornography. I mean, you've 13 seen her say that she, you know, was unclothed 14 in, you know, with barely a patch on her. And we 15 know there are, you know, that she was wearing 16 those shorts. You know, this stuff is not new. 17 We've gone through the facts and truth is on our 18 side. The facts are on our side. I love -- not 19 like, love -- our chances.</p> <p>20 MEGYN KELLY: What are the chances now, 21 Bryan, of a settlement, in light of the ruling on 22 her emotional distress claims and the ruling on 23 your defamation and related counterclaims? 24 BRYAN FREEDMAN: Look, from the 25 beginning, you know, the chances of settlement</p>
<p style="text-align: right;">Page 27</p> <p>1 video of this whole -- this is a film shoot, 2 right. Like, there's filming of the film shoot, 3 right. I mean, you know, Megyn, you saw the 4 scene, you know, where they're dancing. And 5 everyone can judge for themselves. Again, you 6 know, dealing with, you know, we're dealing with 7 people who look at a scene and say the sky is not 8 blue. What do you mean? That blue is not blue.</p> <p>9 MEGYN KELLY: Right.</p> <p>10 BRYAN FREEDMAN: And I think will 11 forever be the case. But, you know, fortunately, 12 she doesn't get to be a juror along with being, 13 you know, the plaintiff. So, we'll have 14 different people that'll be the jurors and 15 hopefully, they'll be able to see the sky is 16 blue.</p> <p>17 MEGYN KELLY: Well, how do you like 18 your chances at trial. This case, put the 19 counterclaims to the side for the moment, that 20 you guys have against Blake. You will go to 21 trial on her claims against Justin, if you guys 22 don't settle. So, how do you like your chances 23 of prevailing in front of a jury on those? 24 BRYAN FREEDMAN: Truth, facts, both on 25 our side. I mean, I love our case of prevailing</p>	<p style="text-align: right;">Page 29</p> <p>1 were next to zero when you add the parties that 2 are involved in this. You know, Justin, you 3 know, while he would have liked to get, you know, 4 millions of dollars to compensate him for his 5 damages as a result of the defamation, that was 6 always secondary to showing that there was no 7 sexual harassment. That's it. I mean, when 8 you're accused of something wrongfully, when you, 9 you know, have to prove your innocence in order 10 to continue to work, there are very little 11 choices here. So, he is going to go all the way 12 and get that adjudication and fight this fight 13 forever. And whether that means appeals or 14 anything else, he's going to make sure that the 15 world knows that he did not engage in sexual 16 harassment, period, end of story.</p> <p>17 MEGYN KELLY: Can you say that you're 18 already there? I mean, I think there's a very 19 strong argument to be made that he's already won 20 that battle. He's -- she's, Amber Heard in the 21 eye of at least half, if not more, of the 22 country. This has been an interesting case 23 because it didn't divide along left-right lines. 24 This is much like Meghan Markle, Blake Lively has 25 managed to unite the right and the left against</p>

<p style="text-align: right;">Page 30</p> <p>1 her. Trust me, I know, because I hear from them. 2 And I wonder to myself, Bryan, whether Justin's 3 already won that victory and whether, as a 4 result, he's interested, if the opportunity is 5 there, anyway, in making the litigation just go 6 away now. 7 BRYAN FREEDMAN: Right. Well, I don't 8 think he's won that battle, you know, yet. I 9 think what he's done is he's put evidence out and 10 he's put truth out, and people have made their 11 own determinations which, you know, seemingly, 12 have only one determination that you can make if 13 you've actually looked at the facts and the 14 evidence. But I don't think he's gotten that 15 moment where, you know, where at court and a jury 16 of his peers say no, no, no, this is not sexual 17 harassment. And I don't think, look, I don't 18 think TAG, the PR team with Melissa Nathan and 19 her team, her team of people that literally have 20 nothing to do with this. They're just, you know, 21 individuals, and Jenn Abel, who's been just 22 trashed after, you know, taking her phone. And I 23 think these people want to be absolved on a 24 public level from a jury of their peers. And I 25 think it's really important that that happen;</p>	<p style="text-align: right;">Page 32</p> <p>1 going? 2 BRYAN FREEDMAN: You know, I have a lot 3 of thoughts. You know, it's interesting how the 4 case is going and, you know, look, I think a lot 5 of things are really interesting. We're moving 6 into a world of AI where you're going to look at 7 a video -- you could do it now -- and you're not 8 going to know what's real or what's not real. I 9 mean, some of the news feeds that I see are 10 inaccurate and not real. And you know, 11 sometimes, you know, people do apologize for 12 things. I think I was surprised that Diddy came 13 out and apologized nationally for the video in 14 the hotel where he was brutally beating, you 15 know, Cassie. And I think that changed the 16 nature of the case. The case then became about, 17 okay, you know, I can be an abuser, I can, you 18 know, deal with domestic violence and getting 19 into fights like that. But you know, that's 20 where I draw the line; I don't drug or rape 21 people and, you know, and do those. And I'm not 22 involved in an organized crime, you know, unit 23 and things like that. And it'll be interesting 24 to see where that case ends up. But you know, 25 Capricorn Clark is a credible person, really</p>
<p style="text-align: right;">Page 31</p> <p>1 especially when someone goes around, you know, 2 making victory tours without, you know, without 3 regard to whatever the real result is. I mean, 4 you saw victory tours when they lost the 5 emotional distress claims, right. Like, you saw 6 a victory tour then. So, you know, again, people 7 are showing you who they are, believe them. 8 MEGYN KELLY: So, you say he's in it to 9 the jury verdict? 10 BRYAN FREEDMAN: Yes. 11 MEGYN KELLY: Well, that's not good for 12 her. She's not going to want that. I think she 13 already likely regrets having started this 14 hornets' nest as much as she wants to play the 15 victim at the Time 100, and everywhere else. 16 Let me, if I, if you don't mind, can I 17 just ask, because you're like the Waldo of 18 litigation, Bryan. Your name comes up in cases I 19 didn't even know you had a hand in. I'm just 20 covering them as a reporter. I'm like, he's 21 there too, like the Diddy trial where I think you 22 were representing Capricorn Clark, one of the 23 witnesses for the prosecution who took the stand. 24 And I just wonder, and maybe you can't say 25 anything, but any thoughts on how that trial is</p>	<p style="text-align: right;">Page 33</p> <p>1 truthful, really interesting. And you know, and 2 look, all someone can ask for is a real jury of 3 their peers to make a decision. And he's got an 4 opportunity to do that. He's got great lawyers, 5 and he's got, you know, a good team and the jury 6 will make a decision based on what's happened in 7 the courtroom. And I don't know exactly what's 8 happened, so I just read the papers like everyone 9 else, or hear from friends that are lawyers who 10 are involved in the case. But I don't know per 11 se. 12 MEGYN KELLY: Capricorn did a good job, 13 in my opinion, on the stand. She was important 14 because she was his assistant for years and 15 testified that he brought her with him over to 16 Kid Cudi's house when he allegedly burgled it, 17 and then later is accused of having launched a 18 Molotov cocktail into it. And she provide a lot 19 of the details that I'm sure it was scary to get 20 up there and talk about. 21 All right, last one. Menendez, you're 22 in that too. Our friend Mark Geragos comes on 23 and talks to me about it from time to time. And 24 you're on the side of representing, I think, some 25 family members of Jose Menendez who would like to</p>

<p style="text-align: right;">Page 34</p> <p>1 see the boys released. And it looks like things 2 are, they took one step closer to potentially 3 getting them out. But what's happening with the 4 Menendez brothers? And do you think that they 5 will be released early? 6 BRYAN FREEDMAN: You know, what's 7 happening is that they have been resentenced, 8 which is phenomenal. I mean, you know, rarely do 9 you see 27 family members who are all on the side 10 of enough is enough, they should be released. 11 You know, rarely do you see that. You know, 12 remember, the family members aren't just family 13 members of, you know, Lyle and Eric; they're 14 family members of Jose and Kitty, so they are 15 victims. And as victims, they say enough is 16 enough, it's time to release them. 17 The judge, you know, (indiscernible) 18 who is an incredible judge, and he saw right 19 through all of this and resentenced them. They 20 have an opportunity now to go in front of the 21 parole board, which the, you know, which is going 22 to happen in August. And then we'll see what 23 happens from there. But I'm really optimistic 24 for the family, that they're going to have a 25 chance to have, you know, holiday meals, you</p>	<p style="text-align: right;">Page 36</p> <p>1 continuing to do exactly that. Thanks for coming 2 on. 3 BRYAN FREEDMAN: You know, Megyn, I am 4 so happy with where you are in your career and 5 you know, and where you are personally right now. 6 It's one of the most special things I've ever 7 been a part of in my entire career. And I'm 8 just, like I am so grateful to be in a position 9 to be able to help people who have suffered 10 injustice. And that's really important to me. 11 And you, you just, you're a star and I love you 12 truly. 13 MEGYN KELLY: Thank you, Bryan. You 14 know it's mutual. I love you; Doug loves you. 15 Denise too, we all love you guys. And it's one 16 of those things where not only did you help me 17 out of the most challenging and awful chapter of 18 my career, but -- and I've talked to so many of 19 your other clients who say the same thing -- you 20 help me believe in myself again. You actually 21 help me believe there was a way back, that this 22 lowest moment would not define me, that we were 23 not going to let these bastards ruin everything. 24 And I've seen you do that for so many others, 25 including Sage Steele and Mike Davis, and the</p>
<p style="text-align: right;">Page 35</p> <p>1 know, maybe even spend, you know, New Year's Day 2 and New Year's Eve with their family and be 3 together for the first time in over 35 years. 4 And I'm really hopeful that they have that 5 opportunity. 6 MEGYN KELLY: All right, what is more 7 likely to happen? Sean Combs gets acquitted? 8 The Menendez brothers are home in time for New 9 Year's Eve? Or Justin is found not liable in her 10 case in chief against him for alleged sexual 11 harassment? 12 BRYAN FREEDMAN: Well, beyond question, 13 Justin is going to be found not liable. So, 14 that's, you know, that's going to happen at some 15 point. You didn't put a timetable on that one. 16 But I truly believe that the Menendez brothers 17 could and will be out by January 1st. And I'm 18 hopeful of that. I'm hopeful for the family 19 members. I really believe that they're going to 20 get, you know, their wish and that, you know, 21 this family can start on a course of repair. 22 MEGYN KELLY: Wow. You're a busy man. 23 I love watching you. I love seeing you so 24 successful, Bryan. And I think Justin Baldoni 25 has been very well served. I look forward to you</p>	<p style="text-align: right;">Page 37</p> <p>1 list goes on and on. And to watch you now doing 2 it for Justin is so heartening. And it's one of 3 the reasons why I believe, I believe it will 4 happen for him too. I don't think he's a 5 wrongdoer. I don't think he's some evil person. 6 She has serious problems. That's my own opinion. 7 She's got some real problems, and she's working 8 them out on him publicly. So, thank God he has 9 you. 10 So, I do want to tell you, Doug says 11 hi. 12 BRYAN FREEDMAN: Great. 13 MEGYN KELLY: And was thrilled that we 14 were doing, that we're doing this. And just, 15 again, thanks for joining. I know you're not 16 giving a lot of these and I'm always grateful. 17 BRYAN FREEDMAN: Well, you know what? 18 Doug is phenomenal. You know, Doug is my role 19 model as a husband. So, I'm -- that's why I love 20 him. 21 MEGYN KELLY: He's still crushing it. 22 In fact, just over my laptop computer I was 23 watching Doug go into the ocean with Yates. Doug 24 is living his best life right now, Bryan. 25 BRYAN FREEDMAN: He's (indiscernible).</p>

10 (Pages 34 - 37)

<p style="text-align: right;">Page 38</p> <p>1 MEGYN KELLY: He's not dealing with 2 12(b)(6) motions. He's having a great time. 3 BRYAN FREEDMAN: No, but he's a 4 talented author and that's, you know, that can be 5 just as hard as 12(b)(6) motions. 6 MEGYN KELLY: True. True. Next one's 7 coming out soon. All right, much love. See you 8 soon, I hope. 9 BRYAN FREEDMAN: Thank you. 10 MEGYN KELLY: Bryan Freedman, everyone. 11 The one and only. Man, if you get in a jam, 12 that's the man to call for all sorts of reasons. 13 Incredible lawyer, even better man. Just an 14 honor to have him on and to know him. 15 Okay. I made it 24 hours into my 16 vacation, not even -- having to come back on. 17 It's always a possibility. And I bring this 18 whole setup with me. I mean, right now I'm in 19 like our little hotel bedroom. I've got my mic, 20 which I travel with. I've got my little 21 computer. I've got my laptop. And I don't know, 22 whatever -- Radar is my tech guy; he sends me 23 with a bunch of stuff, just in case, just in 24 case. And I talked to Bryan and he said he'd do 25 it. You know, he hasn't talked to anybody about</p>	<p style="text-align: right;">Page 40</p> <p>1 attacked, very much attacked by Blake Lively in 2 her team, and the Times, for that matter, and I'm 3 sure they would like their day in court. 4 So, in any event, this thing will keep 5 going and right now they have a trial date, I 6 believe it's March of '26. So, we shall see. 7 Will she -- if it's going to settle before that, 8 I don't know how. I don't think Justin Baldoni 9 will be paying any money to her. And I don't 10 think she wants to walk away because that 11 telegraphs the wrong thing. So, stay tuned. 12 Okay, I'm going back to vacay. I don't 13 think I'll be seeing you immediately. Let's 14 hope. Because I actually would like to do some 15 swimming and see the fam. So, lots of love to 16 you guys too and I'll see you soon. Bye. 17 Let's be real. Our modern world is 18 toxic, from ultra-processed foods to 19 environmental chemicals, our bodies are under 20 attack every single day. And one of the biggest 21 casualties, our digestion. Millions of people 22 suffer with indigestion, bloating and stomach 23 upset. But here's some good news. We do not 24 have to just accept this. Our ancestors had an 25 answer all along, bitter foods. Did you know</p>
<p style="text-align: right;">Page 39</p> <p>1 this. He gave like one paper statement to a 2 couple of media outlets. And I've been dying to 3 hear his thoughts. So, anyway, thank you for 4 coming back with us. You heard my legal analysis 5 of this case, my own personal legal analysis 6 earlier. And on a separate program that we 7 dropped right before this one, in our feed. And 8 now you heard Bryan's take on it. And also his 9 plans. 10 I mean, really, there was a lot of news 11 in there, full steam ahead, right to verdict; no 12 settlement discussions. They're not interested 13 in settling. And that Blake Lively could be 14 getting deposed as soon as June. And he left the 15 door open for Ryan Reynolds. And if you listened 16 carefully, potentially a Taylor Swift deposition 17 there too. So, it's not over, not by a longshot. 18 He does not think that Justin Baldoni has been 19 served the righteous verdict in the public 20 opinion that he deserves, nor have the other 21 defendants. 22 You know, he was mentioning the PR 23 people who were helping Justin when this was 24 bubbling up into a PR crisis and they were still 25 shooting the movie. And those two have been very</p>	<p style="text-align: right;">Page 41</p> <p>1 this? Bitter herbs and plants have been used for 2 centuries to stimulate digestion, support detox, 3 and to keep the gut thriving. 4 I want to tell you about Just Thrive 5 Digestive Bitters, with a powerful blend of 6 ancient, time-tested bitter herbs, Just Thrive 7 says just one dose before meals can wake up your 8 digestive system. And Just Thrive says it helps 9 you break down food properly. And it helps with 10 bloating and sluggish digestion. Consider 11 ditching the modern toxins and getting back to 12 what our bodies were designed for. Consider Just 13 Thrive Digestive Bitters, available now at 14 JustThriveHealth.com. Use code MEGYN to save 20 15 percent off your first order. 16 JustThriveHealth.com, promo code M-E-G-Y-N. 17 When your metabolism works perfectly, 18 you feel the benefits in so many aspects of life, 19 and that's why I want to tell you about Lumen. 20 Lumen is the world's first handheld metabolic 21 coach. It's a device that measures your 22 metabolism through your breath. The app lets you 23 know if you are burning fat or carbs, and gives 24 tailored guidance to improve nutrition, workouts, 25 sleep, and even stress management. Just breathe</p>

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 3 and more. You even get a personalized nutrition
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