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Via ECF

Hon. Lewis J. Liman
United States District Court

December 23, 2025

Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write in opposition to Blake Lively’s motion for sanctions and other relief concerning the deposition of Nicole Alexander (the “Motion”). (Dkt. 1133).

Ms. Alexander is an expert in digital ecosystems, AI-mediated brand perception, and online reputation measurement. She was designated by the Wayfarer Parties to rebut certain expert reports concerning whether the social media activity regarding Ms. Lively from August 2024 through February 2025 was caused by a coordinated, negative manipulation campaign (as Ms. Lively alleges) or was the result of organic public engagement and entertainment industry media cycles. (Fritz Decl., ¶ 3). On December 15, 2025, Ms. Alexander was deposed, *for seven hours*, by Ms. Lively’s counsel, Meryl Governski, about her expertise and her expert report. (Fritz Decl., Ex. 1).¹

Rule 30(c)(2) of the Federal Rules of Civil Procedures provides that “[a]n objection [during a deposition] must be stated concisely in a nonargumentative and nonsuggestive manner.” Under Rule 30(d)(2), courts are authorized to impose sanctions for conduct that “impedes, delays, or frustrates the fair examination of the deponent.” Ms. Lively submitted to the Court only 35 pages from Ms. Alexander’s deposition transcript – a mere ten percent thereof – presumably to create a false narrative. We submit herewith the entire transcript so that the Court can see that ***Ms. Alexander’s deposition was not impeded, delayed, or frustrated***. Upon reviewing the transcript, the Court will see that the Wayfarer Parties’ counsel concisely and appropriately objected to the form of certain questions, did not utilize speaking objections, and permitted Ms. Alexander to answer every question (except for one topic, which is addressed below). The Motion ***does not***

¹ Ms. Alexander’s deposition had nothing to do with Ms. Lively’s sexual or romantic history. Nonetheless, the Motion attaches a self-serving letter, ***from three months ago***, sent by Ms. Lively’s counsel to the Wayfarer Parties’ counsel, complaining (erroneously) about certain deposition questions purportedly concerning her “sexual or romantic history.” (Dkt. 1133-3). The questions at issue therein pertained to Ms. Lively’s reputation, which she put at issue. (Fritz Decl., Ex. 2). Given that Ms. Lively did not seek relief from the Court months ago *about any purportedly improper lines of questioning* and is not seeking such relief now, the Motion seemingly was filed solely to generate inflammatory headlines and falsely besmirch the character of the Wayfarer Parties’ counsel. *See, e.g., William Earl, Blake Lively’s Lawyers Blast Justin Baldoni’s Lawyers’ Deposition Behavior, Say Questions About Her Sex History Should Be Off Limits*, Variety (Dec. 19, 2025), <https://variety.com/2025/film/news/blake-lively-justin-baldoni-lawyers-sex-history-off-limits-1236613219/>; BreAnna Bell, *Blake Lively’s lawyers blast Justin Baldoni’s team over probing her sex life in ‘disruptive’ depositions*, New York Post (Dec. 20, 2025), <https://pagesix.com/2025/12/20/celebrity-news/blake-livelys-lawyers-blast-justin-baldonis-team-over-disruptive-deposition-behavior/>.

identify any material area of testimony Ms. Governski sought to explore that she was prevented from exploring by counsel's objections. *See Edwards v. Wilkie*, No. 16-cv-8031, WL 5957171, at *3 (S.D.N.Y. Nov. 13, 2019) (denying sanctions motion where objections to deposition questions "while numerous, were not inappropriate or unwarranted[,] where the "vast majority of the objections were not speaking objections" and where "defense counsel only instructed [the witness] not to answer one time"); *IBM Corp. v. Micro Focus (US) Inc.*, No. 22-cv-9910, 2024 WL 535730 (S.D.N.Y. Jan. 3, 2024) (denying sanctions motion where deposition "transcript reveals that any speaking objections that occurred were not so pervasive or disruptive as to warrant sanctions").

A review of what Ms. Lively labels "frequent speaking objections" demonstrates the triviality of the Motion. Although Ms. Lively alleges that the Wayfarer Parties' counsel "interrupt[ed]" the deposition to ask whether Ms. Alexander should review an exhibit, the cited "examples" show that: (a) Ms. Lively's counsel Meryl Governski was unaware Ms. Alexander had amended her expert report, erroneously claimed that the amended report had not been served upon her (it had been, a month earlier) and the Wayfarer Parties' counsel professionally steered her in the right direction (Fritz Dec., Ex. 1, at 59:4 – 61:25); (b) Ms. Alexander (who had never previously been deposed, in any litigation, let alone remotely) was advised to download an exhibit (so she can review the entire document, as one would do in-person) rather than review only the portions viewable to her though Ms. Governski's "screen sharing" (*id.*, at 93:5 – 94:2); and (c) Ms. Governski asked Ms. Alexander to "summarize" a lengthy article cited in the expert report, the witness was confused about whether she was being to summarize it "offhand" (from memory), and, when the Wayfarer Parties' counsel asked for clarity, Ms. Governski launched into a tirade instead of clarifying what she was asking Ms. Alexander to do. (*Id.*, at 134:5 – 139:11). During one exchange cited by the Motion, Ms. Governski interrupted the witness, who was confused by the line of questioning, and the Wayfarer Parties' counsel suggested that Ms. Governski listen to the witness so that the questions could be clarified. (*Id.*, at 182:5 – 185:5). *See Kennedy v. City of New York*, No. 12-cv-4166, 2016 WL 3460417, at *4 (S.D.N.Y. June 20, 2016) (denying sanctions motion because there was no indication that request for clarification of deposition question was made in bad faith or frustrated the deposing party's ability to conduct a fair examination). Even if such colloquy can be liberally construed to violate Rule 30(c)(2), which it should not, "violation of the rule is mitigated to some degree if the colloquy that occurred as a result of objections related to matters of clarification...." *Wang v. New York-New Jersey Section of Ninety-Nines Inc.*, No. 18-cv-1780, 2020 WL 13561262, at *4 (S.D.N.Y. Dec. 29, 2020) (internal quotation omitted) (denying sanctions motion even though "defense counsel spoke more than was necessary to state his objections" under Rule 30(c)(2)). Notably, at the start of the deposition, Ms. Governski failed to instruct the witness, as is standard in depositions, that if she did not understand a question, she should say so and Ms. Governski would rephrase it. (Fritz Decl., Ex. 1). As for Ms. Lively's criticism that Ms. Alexander was sometimes instructed to "answer again", such instruction is not improper. *See Wang*, 2020 WL 13561262, at *4 (instruction to answer "if you understood" or "if you can" were not improper and, to the contrary, "those phrases show defense counsel reminding the deponent to that she should answer the question notwithstanding the fact that he objected"). Examples of improper speaking objections are those made by Ms. Lively's counsel, Esra Hudson, at the deposition of non-party Jenny Slate. (Fritz Decl., Ex. 2).

Ms. Governski never instructed Ms. Alexander, at the outset of the deposition, that she could request a break (Fritz Decl., Ex. 1), which is a routine. Ms. Lively nevertheless inexplicably takes issue with a suggestion, **after two hours of questioning**, that Ms. Alexander (and the stenographer) be provided with a break during the deposition. After such break was requested by Ms. Alexander's

counsel, Ms. Governski proceeded to ask another question, then utilized the guise of a “pending question” as a basis to refuse a break and ultimately was proven wrong when the stenographer confirmed that no question had been pending. (Fritz Decl., Ex. 1, at 108:2 – 112:6). In sum, the questioning of Ms. Alexander went relatively smoothly, especially after the parties’ counsel conferenced with the Court during a break, and Ms. Lively failed to show that the deposition was impeded, delayed or frustrated in any substantive manner. *See Severstal Wheeling Inc. v. WPN Corp.*, No. 10-cv-954, 2012 WL 1982132 (S.D.N.Y. May 30, 2012) (denying sanctions motion despite “a heated exchange at the end of the deposition” because any conduct that violated Rule 30 was not extreme and had no material effect on the testimony).

“A person may instruct a deponent not to answer only when necessary to preserve a privilege....” (Fed. R. Civ. P. 30(c)(2)). The only time Ms. Alexander was instructed not to answer was based on privilege/work product and in connection with questions concerning her conversations with “separate counsel” (the identity of whom she was unable to recall) about this case. (Fritz Decl., Ex. 1, at 19:2 – 21:12). Rule 26(b)(4)(C) protects, from disclosure, counsel’s communications with testifying experts. *See King v. Wang*, No. 14-cv-7694, 2021 WL 5232454, at *17 (S.D.N.Y. Nov. 9, 2021) (Liman, J.) (“communications between a party’s attorney and an expert witness ‘retained or specially employed’ are protected from disclosure except for communications that, among other things, ‘identify facts or data that the party’s attorney provided and that the expert considered in forming the opinions to be expressed.’”). In response, Ms. Governski improperly attempted to debate counsel *during the deposition* about the instruction to Ms. Alexander not to answer. (Fritz Decl., Ex. 1, at 21:21 - 23:12).² In violation of Rule 4.C of this Court’s Individual Practices in Civil Cases, Ms. Lively’s counsel failed to meet and confer, after the deposition (or even during a break therein), concerning the propriety of the objection. The Motion should be denied for that reason alone. *See Jones et al. v. Abel*, No. 25-cv-779 (S.D.N.Y. Sept. 26, 2025). Had Ms. Lively’s counsel adhered to the Court’s Individual Practices concerning the resolution of discovery disputes, we would have agreed to a short continuation of Ms. Alexander’s deposition, via remote means and on a mutually convenient date, limited to questions concerning her communications with the “separate counsel” identifying facts or data that such counsel provided to her and that she considered in forming her opinions expressed in her report. We so stipulate now.

The Motion to sanction Bryan Freedman and the undersigned is frivolous because it is based upon an alleged “ongoing pattern of deposition misconduct” ***but cites no prior conduct by either attorney at any deposition.*** (Dkt. 1133-4; 1133-5).³ Furthermore, the Motion cites cases in which the attorney “deliberately violated repeated Orders of the Court” (*Antolini v. McCloskey*, No. 19-cv-09038, 2021 WL 5411176, at *12 (S.D.N.Y. Nov. 19, 2021), “engaged in prolonged and unnecessary argument regarding the relevancy of a simple question” and instructed the witness “not to answer on relevancy grounds” (*Fashion Exch. LLC v. Hyrid Prom., LLC*, 333 F.R.D. 302, 305 - 307 (S.D.N.Y. Sept. 26, 2019), or was held responsible for its client’s violation of orders to produce documents (*Syntel Sterling Best v. Trizetto Group*, 328 F.R.D. 100, 124 (S.D.N.Y. 2018), none of which Ms. Lively even alleges (or demonstrates) that either Mr. Freedman or the undersigned did. The only “ongoing pattern” is Ms. Lively’s use of the media to disparage others and distract the public from the legal issues at hand.

² Ironically, it was Ms. Governski’s own improper attempt to debate counsel during the deposition that prompted Bryan Freedman’s request to her that she cease such misconduct. (Fritz Decl., Ex. 1, at 21:9 – 23:12).

³ The citations to Jamey Heath’s deposition transcript concern an entirely different situation where counsel was not responding to any pending question but raising concerns about lengthy breaks that Ms. Lively’s counsel was taking.

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/s/ Kevin Fritz

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cc: all counsel of record (via ECF)

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
(consolidated with 1:25-cv-00449-LJL)

JENNIFER ABEL,

Third-Party Plaintiff,

-v-

JONESWORKS LLC,

Third-Party Defendant.

DECLARATION OF KEVIN FRITZ

I, Kevin Fritz, 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 Meister Seelig and Fein PLLC, 125 Park Avenue, 7th Floor, New York, NY 10017, and counsel of record for defendants Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”) in the above-captioned action.

2. I respectfully submit this declaration in opposition to Blake Lively’s motion for sanctions and related relief in connection with the deposition of Nicole M. Alexander.

3. Ms. Alexander is an expert in digital ecosystems, AI-mediated brand perception, and online reputation measurement. She was retained by the Wayfarer Parties to rebut certain expert reports concerning whether the social media activity regarding Ms. Lively during August 2024 through February 2025 was caused by a coordinated, negative manipulation campaign (as Ms. Lively alleges) or was the result of organic public engagement and entertainment industry media cycles.

4. A true copy of the transcript of the deposition of Ms. Alexander, taken on December 15, 2025, is attached as Exhibit 1.¹

5. True copies of excerpts from the deposition of Jenny Slate, taken on September 26, 2025, are attached as Exhibit 2.

¹ The specifics of an illness suffered by Ms. Alexander have been redacted.

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

Dated: December 23, 2025
New York, NY

/s/ Kevin Fritz
MEISTER SEELIG AND FEIN PLLC
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New York, NY 10017
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Exhibit 1

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,

Plaintiff,

vs.

CASE NO. 24-CV-10049-LJL (LEAD CASE)

25-CV-449 (LJL) (MEMBER CASE)

WAYFARER STUDIOS LLC, ET AL.,

Defendants.

JENNIFER ABEL,

Third-party Plaintiff,

vs.

JONESWORKS, LLC,

Third-party Defendant.

WAYFARER STUDIOS LLC, et al.,

Consolidated Plaintiffs,

vs.

BLAKE LIVELY, et al.,

Consolidated Defendants.

****CONFIDENTIAL****

VIDEO-RECORDED DEPOSITION OF NICOLE ALEXANDER

APPEARING REMOTELY FROM

New York, New York

Monday, December 15, 2025

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

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<p style="text-align: right;">Page 2</p> <p>1 UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF NEW YORK 3 ---000--- 4 5 BLAKE LIVELY, 6 Plaintiff, 7 vs. CASE NO. 24-CV-10049-LJL (LEAD CASE) 25-CV-449 (LJL) (MEMBER CASE) 8 9 WAYFARER STUDIOS LLC, ET AL., 10 Defendants. 11 12 JENNIFER ABEL, 13 Third-party Plaintiff, 14 vs. 15 JONESWORKS, LLC, 16 Third-party Defendant. 17 18 WAYFARER STUDIOS LLC, et al., 19 Consolidated Plaintiffs, 20 vs. 21 BLAKE LIVELY, et al., 22 Consolidated Defendants. 23 24 **CONFIDENTIAL** 25 Video-recorded Deposition of NICOLE ALEXANDER, taken on behalf of the Plaintiff Blake Lively, Pursuant to Notice, with all parties appearing via video conferencing beginning at 8:04 a.m. PST; 11:04 a.m. EST and ending at 5:06 p.m. PST; 8:06 p.m. EST on Monday, December 15, 2025, before me, ASHLEY SOEVYN, California Certified Shorthand Reporter No. 12019.</p>	<p style="text-align: right;">Page 4</p> <p>1 A P P E A R A N C E S: 2 3 For the Plaintiff Blake Lively: 4 MANATT PHELPS & PHILLIPS LLP 5 BY: ESRA HUDSON 6 BY: SARAH MOSES 7 Attorneys at Law 8 2049 Century Park East 9 Suite 1700 10 Los Angeles, California 90067 11 ehudson@manatt.com 12 smoses@manatt.com 13 (310) 312-4207 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 3</p> <p>1 A P P E A R A N C E S: 2 3 For the Plaintiffs Stephanie Jones and Jonesworks 4 LLC: (NOT PRESENT FOR THIS DEPOSITION) 5 QUINN EMANUEL URQUHART & SULLIVAN 6 BY: KRISTIN TAHLER 7 BY: OLIVIA HOLMES 8 BY: LAURENNE M. BABAYAN 9 Attorneys at Law 10 865 S. Figueroa Street 11 8th Floor 12 Los Angeles, California 90017 13 kristintahler@quinnemanuel.com 14 oliviaholmes@quinnemanuel.com 15 laurennebabayan@quinnemanuel.com 16 (212) 849-7000 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 A P P E A R A N C E S: 2 3 For the Plaintiff Blake Lively: 4 WILLKIE FARR & GALLAGHER 5 BY: KRISTIN BENDER 6 BY: AUTUMN ADAMS-JACK 7 Attorneys at Law 8 1875 K Street 9 Northwest 10 Washington, D.C. 20006 11 kbender@willkie.com 12 aadams-jack@willkie.com 13 (202) 303-1245 14 15 16 17 18 19 20 21 22 23 24 25</p>

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<p style="text-align: right;">Page 6</p> <p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 For the Plaintiff Blake Lively:</p> <p>4 DUNN ISAACSON RHEE</p> <p>5 BY: MERYL GOVERNSKI</p> <p>6 Attorney at Law</p> <p>7 401 9th Street, NW</p> <p>8 Washington, D.C. 20004</p> <p>9 mgovernski@dirllp.com</p> <p>10 (202) 240-2927</p> <p>11</p> <p>12 -AND-</p> <p>13</p> <p>14 SLOANE OFFER WEBER AND DERN</p> <p>15 BY: LINDSEY STRASBERG</p> <p>16 Attorney at Law</p> <p>17 10100 Santa Monica Blvd., Ste. 750</p> <p>18 Los Angeles, California 90067</p> <p>19 (310) 248-5100</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 A P P E A R A N C E S:</p> <p>2 For the Defendants Wayfarer Studios LLC, Jennifer</p> <p>3 Abel, Melissa Nathan and Justin Baldoni, Jamey Heath</p> <p>4 and Steve Sarowitz:</p> <p>5</p> <p>6 AHOURAIAAN LAW</p> <p>7 BY: MITRA AHOURAIAAN</p> <p>8 Attorney at Law</p> <p>9 2029 Century Park East</p> <p>10 Suite 400</p> <p>11 Los Angeles, California 90067</p> <p>12 mitra@ahouraianlaw.com</p> <p>13 (310) 376-7878</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 7</p> <p>1 A P P E A R A N C E S:</p> <p>2 For the Defendants Wayfarer Studios LLC, Jennifer</p> <p>3 Abel, Melissa Nathan and Justin Baldoni, Jamey Heath</p> <p>4 and Steve Sarowitz:</p> <p>5 LINER FREEDMAN TAITELMAN+COOLEY</p> <p>6 BY: BRYAN FREEDMAN</p> <p>7 BY: AMIR KALTGRAD</p> <p>8 Attorneys at Law</p> <p>9 1801 Century Park West, 5th Floor</p> <p>10 Los Angeles, California 90067</p> <p>11 bfreedman@lftcllp.com</p> <p>12 akaltgrad@lftcllp.com</p> <p>13 (310) 201-0005</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 9</p> <p>1 A P P E A R A N C E S:</p> <p>2 For the Defendants Wayfarer Studios LLC, Jennifer</p> <p>3 Abel, Melissa Nathan and Justin Baldoni, Jamey Heath</p> <p>4 and Steve Sarowitz:</p> <p>5 MEISTER SEELIG & FEIN</p> <p>6 BY: MITCHELL SCHUSTER</p> <p>7 Attorney at Law</p> <p>8 125 Park Avenue, 7th Floor</p> <p>9 New York, New York 10017</p> <p>10 ms@msf-law.com</p> <p>11 (212) 655-3549</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22 Also Present:</p> <p>23 Maggie Kane, Veritext Legal Solutions Concierge</p> <p>24 Dina Mayzlin, Plaintiff's Expert</p> <p>25 John MacDonnell, Videographer</p>

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<p>1 INDEX TO EXHIBITS</p> <p>2 NICOLE ALEXANDER</p> <p>3 BLAKE LIVELY V. WAYFARER STUDIOS LLC, ET AL.</p> <p>4 Monday, December 15, 2025</p> <p>5 Ashley Soevyn, CSR No. 12019</p> <p>6 EXHIBIT NO. DESCRIPTION PAGE</p> <p>7 Exhibit 1 Expert Report of Nicole M. 16</p> <p>Alexander, November 3, 2025</p> <p>8</p> <p>9 Exhibit 2 Amended Expert Report of Nicole 62</p> <p>M. Alexander, November 3, 2025</p> <p>10 Exhibit 3 Document titled Inauthentic 91</p> <p>Behavior</p> <p>11</p> <p>12 Exhibit 4 Book titled Ethical AI in 112</p> <p>Marketing Aligning growth,</p> <p>13 responsibility, and customer</p> <p>trust by Nicole Alexander</p> <p>14 Exhibit 4-A Excerpt from Ms. Alexander's 113</p> <p>book page 15</p> <p>15</p> <p>16 Exhibit 4-B Excerpt from Ms. Alexander's 118</p> <p>book page 22 Future Regulations</p> <p>on AI Ethics</p> <p>17</p> <p>18 Exhibit 5 Article by Timothy Graham, Sam 131</p> <p>Hames and Elizabeth Alpert</p> <p>19 titled The Coordination Network</p> <p>Toolkit: a framework for</p> <p>20 detecting and analysing</p> <p>coordinated behaviour on social</p> <p>media</p> <p>21</p> <p>22 Exhibit 6 Document titled GPTZero AI 147</p> <p>Generated</p> <p>23 Exhibit 7 Document titled Sage Research 219</p> <p>Methods Encyclopedia of Research</p> <p>24 Design Meta Analysis</p> <p>25</p>	<p>1 INDEX TO EXHIBITS</p> <p>2 NICOLE ALEXANDER</p> <p>3 BLAKE LIVELY V. WAYFARER STUDIOS LLC, ET AL.</p> <p>4 Monday, December 15, 2025</p> <p>5 Ashley Soevyn, CSR No. 12019</p> <p>6 EXHIBIT NO. DESCRIPTION PAGE</p> <p>7 Exhibit 21 12/4/25 TikTok Hashtag Scraper 321</p> <p>Apify</p> <p>8</p> <p>9 Exhibit 22 11/18/25 Excel TikTok INPUT.xlsx 323</p> <p>10</p> <p>11 Exhibit 23 11/18/25 YouTube README 325</p> <p>12</p> <p>13 Exhibit 24 11/18/25 Excel YouTube INPUT.CSV 329</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>26 Exhibit 25 5/16/2024 It Ends With Us 332</p> <p>Official Trailer on YouTube</p>

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<p style="text-align: right;">Page 14</p> <p>1 ---000---</p> <p>2 CONFIDENTIAL DEPOSITION PROCEEDINGS</p> <p>3 MONDAY, DECEMBER 15, 2025</p> <p>4 ---000---</p> <p>5 THE VIDEOGRAPHER: We're on the record.</p> <p>6 It's 11:04 a.m. Eastern Time on December 15th, 2025.</p> <p>7 This is the deposition of Nicole Alexander. We're</p> <p>8 here in the matter of Blake Lively v. Wayfarer</p> <p>9 Studios LLC, et al.</p> <p>10 I'm John MacDonnell, the videographer</p> <p>11 with Veritext. Before the witness is sworn, would</p> <p>12 counsel please identify themselves beginning with</p> <p>13 noticing party, please.</p> <p>14 MS. GOVERNSKI: Good morning. Meryl</p> <p>15 Governski from Dunn Isaacson Rhee on behalf of</p> <p>16 Ms. Lively. Joining me today are Autumn Adams-Jack,</p> <p>17 co-counsel at Willkie Farr & Gallagher, and Dr.</p> <p>18 Dina Mayzlin, Ms. Lively's -- one of Ms. Lively's</p> <p>19 designated experts.</p> <p>20 MR. FRITZ: Good morning. Kevin Fritz</p> <p>21 from Meister Seelig & Fein on behalf of the</p> <p>22 defendants and the witness.</p> <p>23 MR. SCHUSTER: And Mitch Schuster, also</p> <p>24 from Meister Seelig & Fein, on behalf of the</p> <p>25 defendants and witness.</p>	<p style="text-align: right;">Page 16</p> <p>1 you came down with [REDACTED]. Has your [REDACTED] resolved</p> <p>2 at this point?</p> <p>3 A It was [REDACTED], but yes, it has.</p> <p>4 Q Is there any reason that the [REDACTED]</p> <p>5 would prevent you from giving truthful and complete</p> <p>6 testimony today?</p> <p>7 A None.</p> <p>8 MS. GOVERNSKI: I'm going to go ahead and</p> <p>9 we've marked as Exhibit 1, which is your report in</p> <p>10 this matter.</p> <p>11 (Exhibit 1 marked for identification.)</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q The first page of your report says it was</p> <p>14 prepared for Liner Freedman Taitelman & Cooley LLP.</p> <p>15 Did Liner Freedman retain you in this case?</p> <p>16 A Yes.</p> <p>17 Q And when did Liner Freedman retain you?</p> <p>18 A September possibly. September, October.</p> <p>19 Q September of 2025?</p> <p>20 A '25, yes.</p> <p>21 Q In the course of putting together your</p> <p>22 report, did you interact with any of the attorneys</p> <p>23 at Liner Freedman?</p> <p>24 A Yes, I interacted with Amir -- I'm sorry,</p> <p>25 his last name is...</p>
<p style="text-align: right;">Page 15</p> <p>1 MS. GOVERNSKI: I'm sorry. One more</p> <p>2 thing. Lindsey Strasberg, also co-counsel for</p> <p>3 Ms. Lively is on as well.</p> <p>4 THE STENOGRAPHIC REPORTER: Good morning,</p> <p>5 everyone, Ashley Soevyn, California. Steno</p> <p>6 reporter, license 12019.</p> <p>7 Ma'am, can I please have you raise your</p> <p>8 right hand?</p> <p>9 Do you solemnly state that the testimony</p> <p>10 you're about to give in this deposition will be the</p> <p>11 truth, the whole truth, and nothing but the truth?</p> <p>12 THE WITNESS: Yes, I do.</p> <p>13 THE STENOGRAPHIC REPORTER: Great. Thank</p> <p>14 you.</p> <p>15 EXAMINATION</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q Good morning, Ms. Alexander. Can you</p> <p>18 please state your full name for the record?</p> <p>19 A Nicole Marie Alexander.</p> <p>20 Q Is there any reason today, Ms. Alexander,</p> <p>21 that you won't be able to give truthful and complete</p> <p>22 testimony?</p> <p>23 A None.</p> <p>24 Q You understand we originally were</p> <p>25 supposed to meet last week, and I understand that</p>	<p style="text-align: right;">Page 17</p> <p>1 Q Kaltgrad?</p> <p>2 A Yes, thank you.</p> <p>3 Q Did you interact with any other attorneys</p> <p>4 at Liner Freedman?</p> <p>5 A Not while I was preparing my report, no.</p> <p>6 Q Well, when did you interact with any</p> <p>7 other attorneys at Liner Freedman?</p> <p>8 A I met Kevin Fritz, who is on currently,</p> <p>9 afterwards. Probably three weeks ago.</p> <p>10 Q Okay. And how often, during the course</p> <p>11 of putting together your report, did you speak with</p> <p>12 Mr. Kaltgrad?</p> <p>13 A Maybe I touched base once a week via</p> <p>14 email. Email or call.</p> <p>15 Q Since you were retained in September or</p> <p>16 October 2025?</p> <p>17 A Correct.</p> <p>18 Q And what is your understanding of which</p> <p>19 clients, on behalf of Liner Freedman, retained you?</p> <p>20 A I believe it is Wayfarer and maybe</p> <p>21 partially Baldoni as well. I'm not quite sure. I</p> <p>22 know there are several different counsels. I'm not</p> <p>23 sure the inter- -- the operations.</p> <p>24 Q Okay. So the defendants in this case</p> <p>25 include Mr. Baldoni, Wayfarer, Jamey Heath,</p>

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<p style="text-align: right;">Page 18</p> <p>1 Steve Sarowitz, Melissa Nathan, Jennifer Abel, 2 It Ends with Us and TAG PR? 3 A Uh-huh. 4 Q Do you understand that you are testifying 5 on behalf of all of those defendants today? 6 A I believe I am, because I thought it was 7 part of the collective. So... 8 Q Okay. So if I refer to the Wayfarer 9 defendants throughout the day, you will understand 10 that I'm referring to that big group of defendants? 11 A Yes. 12 Q Prior to this litigation, have you had 13 any interactions with any of the Wayfarer 14 defendants? 15 A No. 16 Q During the course of this litigation, 17 have you had any interaction with any of the 18 Wayfarer defendants? 19 A No. 20 Q And you refer to "other counsel." You 21 understand that the Wayfarer defendants have counsel 22 other than Liner Freedman, right? 23 A I believe so, yes. 24 Q To what extent have you interacted with 25 any attorneys other than those at Liner Freedman and</p>	<p style="text-align: right;">Page 20</p> <p>1 BY MS. GOVERNSKI: 2 Q Do you remember their names -- 3 A I don't -- 4 Q -- their first names? 5 A I don't. 6 Q Kim? 7 A Honestly, it was about a 30-minute call 8 and I -- back in August maybe. I'm not sure of 9 their name. 10 Q Okay. What do you recall about that 11 call? 12 A It was a -- 13 MR. FRITZ: Hold on. I would just 14 instruct you not to disclose the substance of the 15 conversation. 16 MS. GOVERNSKI: She wasn't engaged at 17 that time. 18 MR. FRITZ: Attorney-client privilege. I 19 understand your position. 20 BY MS. GOVERNSKI: 21 Q Are you following your counsel's advise 22 not to answer questions? 23 MR. FRITZ: She is. 24 THE WITNESS: Yes. 25</p>
<p style="text-align: right;">Page 19</p> <p>1 Mr. Fritz, as you just mentioned? 2 A Prior to coming on board with the 3 engagement with Amir, I had a conversation with 4 separate counsel, which I believe is part of a 5 separate law firm. 6 Q And who is that? 7 A I could not tell you. It was two -- two 8 attorneys. It was part of a vetting process. They 9 were looking to -- for someone with my background to 10 come on as an expert witness. 11 Q And that was, you said, prior to you 12 coming on with the engagement, right? 13 A With -- yes, correct. 14 Q So that conversation preceded your 15 engagement? 16 A Correct. 17 Q Were those two attorneys with Shapiro 18 Arato Bach? 19 A Honestly, I'm not sure. 20 Q Were they female or male attorneys? 21 A Both female. 22 Q Is it possible that they were at 23 Liner Freedman? 24 MR. FRITZ: Objection. 25 THE WITNESS: I -- I don't want to guess.</p>	<p style="text-align: right;">Page 21</p> <p>1 BY MS. GOVERNSKI: 2 Q Ms. Alexander, at the time you had this 3 conversation, had you ever spoken with any of these 4 individuals before? 5 A No. 6 Q Did you understand that they were 7 speaking with a number of individuals; you called it 8 part of a vetting process? 9 MR. FRITZ: Same instruction. To the 10 extent that your answer would require you to 11 disclose the substance of your conversation, I would 12 instruct you not to answer that. 13 BY MS. GOVERNSKI: 14 Q Are you following your counsel's 15 instruction not to answer? 16 A Yes. 17 Q Well, you mentioned -- 18 MR. FRITZ: Just going forward, she's 19 always going to follow my instruction not to answer, 20 so... 21 MS. GOVERNSKI: Can you articulate your 22 basis for instructing her not to answer? 23 MR. FREEDMAN: Can we stop with the 24 speaking objections? 25 MR. FRITZ: Sorry, I don't know who that</p>

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<p style="text-align: right;">Page 22</p> <p>1 is.</p> <p>2 MR. FREEDMAN: That's Bryan Freedman.</p> <p>3 MS. GOVERNSKI: Mr. Freedman, you're not</p> <p>4 entered in this -- in this, so you're --</p> <p>5 MR. FREEDMAN: You know what, you will</p> <p>6 need to stop with the -- you'll need to stop with</p> <p>7 the speaking objections.</p> <p>8 MS. GOVERNSKI: It's my deposition.</p> <p>9 MR. FREEDMAN: Yeah, that's right, and</p> <p>10 you're improperly handling it, and you don't know</p> <p>11 what you're doing or how to practice law. So stop</p> <p>12 with your speaking objections.</p> <p>13 MS. GOVERNSKI: Counsel, please mute</p> <p>14 Mr. Freedman who has not entered an appearance in</p> <p>15 this deposition. And I am not giving speaking</p> <p>16 objections. You're instructing your own counsel not</p> <p>17 to give speaking objections. It's my deposition.</p> <p>18 MR. FREEDMAN: No, you're the one giving</p> <p>19 speaking objections, as your mouth is moving right</p> <p>20 now.</p> <p>21 MS. GOVERNSKI: Can we please --</p> <p>22 Mr. Fritz, can you please control your co-counsel or</p> <p>23 I'm going to have to seek relief from the Court.</p> <p>24 MR. FRITZ: I mean, he's not incorrect.</p> <p>25 You're, like, trying to engage --</p>	<p style="text-align: right;">Page 24</p> <p>1 Q And what about your background did you</p> <p>2 understand prompted that call?</p> <p>3 MR. FRITZ: Instruct the witness not to</p> <p>4 answer to the extent it would require the disclosure</p> <p>5 of a privileged communication.</p> <p>6 THE WITNESS: I will follow his</p> <p>7 instructions.</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q Ms. Alexander, what is your understanding</p> <p>10 of what in your background prompted GLG to reach out</p> <p>11 to you?</p> <p>12 MR. FRITZ: Same instruction not to</p> <p>13 answer.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q Ms. Alexander, did you have any</p> <p>16 understanding before you got on that call of why you</p> <p>17 were getting on it?</p> <p>18 A Yes, I did.</p> <p>19 Q And what was that understanding?</p> <p>20 A As part of GLG, which is an expert</p> <p>21 network of individuals with different backgrounds, I</p> <p>22 had been asked to come on the call to discuss how I</p> <p>23 would approach -- as an expert witness, how I would</p> <p>24 approach the opportunity to do data science and</p> <p>25 analytics as part of a case.</p>
<p style="text-align: right;">Page 23</p> <p>1 (Cross talk.)</p> <p>2 MS. GOVERNSKI: I'm asking to understand</p> <p>3 -- I'm asking, Mr. Fritz, you to explain the basis</p> <p>4 for your objection so I can understand what your</p> <p>5 perception is on the line on privilege.</p> <p>6 MR. FRITZ: You have it.</p> <p>7 MS. GOVERNSKI: No, I would like you to</p> <p>8 explain to me -- I am asking you to explain to me</p> <p>9 your line on privilege when Ms. Alexander said she</p> <p>10 was not engaged at that time.</p> <p>11 MR. FRITZ: I'm not going to engage in</p> <p>12 the debate during the deposition.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q Ms. Alexander, how did you come to be on</p> <p>15 that phone call in August?</p> <p>16 A I was engaged via GLG, and GLG put me in</p> <p>17 contact with the two women I referenced earlier.</p> <p>18 Q And what was your understanding of the</p> <p>19 purpose of that call?</p> <p>20 MR. FRITZ: Objection.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q You can answer.</p> <p>23 A I was asked to come on to meet them to</p> <p>24 talk about my background in social media and data</p> <p>25 analysis.</p>	<p style="text-align: right;">Page 25</p> <p>1 Q Are you part of GLG?</p> <p>2 A I am.</p> <p>3 Q And when did you become part of GLG?</p> <p>4 A Twelve years ago.</p> <p>5 Q And how did you describe your expertise</p> <p>6 within the GLG Network?</p> <p>7 A So my background is -- my CV is published</p> <p>8 as part of the network. And a basic summary is 25</p> <p>9 years of experience across data analytics,</p> <p>10 marketing, and some more of my credentials, just</p> <p>11 being in academia, my book, et cetera.</p> <p>12 Q And so you've been part of GLG Network</p> <p>13 for 12 years. Have you ever been part of what you</p> <p>14 described as the vetting process before?</p> <p>15 A For litigation work, is that the</p> <p>16 question?</p> <p>17 Q Yes. Yes.</p> <p>18 A No, this is the first time.</p> <p>19 Q So in 12 years as being part of GLG, this</p> <p>20 was the first time you've received that call?</p> <p>21 A For litigation work, yes.</p> <p>22 Q And what did GLG say to you when they</p> <p>23 called you?</p> <p>24 A I'm sorry. It was not a call. I</p> <p>25 shouldn't say that. It was outreach via electronic</p>

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<p style="text-align: right;">Page 26</p> <p>1 correspondence. So it was a survey that I filled 2 out, and I answered the question. 3 Q What were the questions in the survey? 4 A Honestly, I couldn't remember. 5 Q Do you have any recollection of the type 6 of questions the survey was asking you? 7 MR. FRITZ: Objection. 8 You can answer. 9 THE WITNESS: I don't. I fill out many, 10 many surveys. 11 BY MS. GOVERNSKI: 12 Q And this was the first survey you filled 13 out that you've received a callback in a litigation 14 matter; is that right? 15 A Correct. 16 Q How soon after that survey did you 17 receive a callback? 18 A I would say within three weeks. 19 Q And after you filled out that survey, did 20 you -- you receive a callback from GLG or was it 21 directly from the counsel that you spoke with? 22 A No, it was GLG. 23 Q And what did GLG tell you when they 24 called you back? 25 A They asked to set up a 30-minute Zoom</p>	<p style="text-align: right;">Page 28</p> <p>1 BY MS. GOVERNSKI: 2 Q Did they tell you that anything you said 3 on that call would be protected by attorney-client 4 privilege? 5 MR. FRITZ: Same instruction. 6 BY MS. GOVERNSKI: 7 Q On that call, Ms. Alexander, did they 8 tell you that -- what they want your opinions on 9 this matter to be? 10 MR. FRITZ: Same instruction. 11 BY MS. GOVERNSKI: 12 Q Ms. Alexander, did they tell you how the 13 drafting of the report would be handled during that 14 call? 15 MR. FRITZ: Same instruction. 16 BY MS. GOVERNSKI: 17 Q Did you discuss your report with anyone 18 other than Wayfarer defendants' counsel? 19 A No, no one else. 20 Q Your report refers to an assistant... 21 A I was going to say, I apologize. Let me 22 rephrase. No one outside of my team, which is the 23 assistant referenced, other than Wayfarer's counsel. 24 Q Who is the assistant? 25 A Taylor Hunter, T-A-Y-L-O-R.</p>
<p style="text-align: right;">Page 27</p> <p>1 call with the attorneys. 2 Q Okay. And you used the term "vetting 3 process." Why did you use that term? 4 A That would be what I call any -- any 5 conversation like that. I -- I made the assumption 6 that they were looking to understand my background 7 to see if I was an appropriate fit. Specifically, 8 also around like things like availability, is 9 usually a part of any conversation that I've had 10 with GLG, if I'm available for the work, things of 11 that nature. 12 Q And did those individuals on the call 13 tell you that they were looking for you to testify 14 that there was no smear campaign? 15 MR. FRITZ: I would -- let me instruct 16 the witness not to answer. And similarly, for any 17 other question that seeks to obtain information that 18 is protected by the attorney-client privilege, I 19 would give you the same instruction. 20 BY MS. GOVERNSKI: 21 Q Ms. Alexander, when you had that call, 22 did you understand that it would be protected by 23 attorney-client privilege? 24 MR. FRITZ: Instruction not to answer. 25</p>	<p style="text-align: right;">Page 29</p> <p>1 Q Okay. Who is Taylor Hunter? 2 A She's a data scientist. 3 Q Does she work with you? 4 A She worked with me on this particular 5 piece of work. 6 Q Had you met Ms. Hunter before? 7 A She was referred to me by someone else 8 within my network. She's not the normal per- -- the 9 normal data scientist I work with. 10 Q Why didn't you use the normal data 11 scientist that you work with? 12 A She is -- she was unavailable and offline 13 taking care of personal matters. 14 Q And why were you looking for an 15 assistant? 16 A Because of the scope of the work that I 17 do is just too much for one person. 18 Q So tell me the process of you soliciting 19 the assistance of Ms. Hunter. 20 A I reached out to someone else in my 21 network to see if they were available, someone who I 22 had worked with previously. They were unavailable, 23 and referred -- and gave a reference to Taylor 24 Hunter. I contacted Taylor Hunter and asked some -- 25 again, I'm going to use the word "vetting" -- some</p>

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<p style="text-align: right;">Page 30</p> <p>1 vetting questions, just around her background, the 2 projects she had done previously, to see some of 3 those projects. And then I subsequently engaged 4 her. 5 Q And who was the individual in your 6 network who was unavailable? 7 A So I can't pronounce her full name. It's 8 Annu and Praavi. Her last name is Praavi (ph). 9 Q And when you say "in your network," what 10 do you mean? 11 A She's someone that I've known for I think 12 the last year. We've spoken at the same conference 13 together. I've seen the work that she does, and 14 yes, it's someone that I know, I guess, cordially. 15 Q And what were those vetting questions 16 that you asked Ms. Hunter? 17 A I don't know them offhand. 18 Q Well, what kind of questions would you 19 ask while you were vetting someone to assist you as 20 your assistant? 21 MR. FRITZ: Objection. 22 You can answer. 23 THE WITNESS: So I would ask what 24 projects specifically they've done around social 25 media, whether it was analytical, computational</p>	<p style="text-align: right;">Page 32</p> <p>1 myriad of different variables in order to -- sorry, 2 I've never had someone ask me that before. It's 3 someone that looks at data in order to interpret 4 that data into understanding outcomes, patterns -- 5 yes. 6 Q And what about Ms. Hunter's background 7 made you feel comfortable that she was experienced 8 sufficiently to handle that task? 9 A She currently works in data analysis 10 within the role that she currently has, and she's 11 done so for several years. 12 Q But for a company that you had never 13 heard of; is that right? 14 A Yes, there is a lot of companies that I'm 15 unaware of. 16 Q Understood. And did you retain 17 Ms. Hunter? 18 A Yes. 19 Q And so you pay Ms. Hunter? 20 A Correct. 21 Q And how much is Ms. Hunter paid? 22 A 280 an hour. 23 Q And when did you retain Ms. Hunter? 24 A At the beginning of the project, so 25 sometime in September. I'm not sure.</p>
<p style="text-align: right;">Page 31</p> <p>1 science or like forensics work. I would like to see 2 the project specifically if it's available and it's 3 not private. Asking them to also share the dataset 4 with me. Also, I would ask for data visualization 5 project, whether it was in conjunction with the 6 first project that they are sending me, or a 7 separate one, just to show their use of tools, how 8 they visualize data, how they story tell. And those 9 are the core questions for this kind of work. 10 BY MS. GOVERNSKI: 11 Q And what is your understanding of 12 Ms. Hunter's academic background? 13 A Her academic background, I think she has 14 an advanced degree. 15 Q In what? 16 A It's not comp sci. I'm not sure. 17 Q Okay. And what is your understanding of 18 her current career? 19 A She handles -- she's a data scientist for 20 a company. I can't remember the company offhand. 21 Q Had you heard of that company before? 22 A I'm assuming not if I can't remember it 23 easily, so I will say no. 24 Q And what is a data scientist? 25 A It's someone that looks at data and a</p>	<p style="text-align: right;">Page 33</p> <p>1 Q September or October, after you had the 2 conversation -- or after you were retained by 3 Liner Freedman? 4 A Correct, after I was retained. 5 Q Okay. Where does Ms. Hunter live? 6 A She's in Texas. 7 Q Have you ever met Ms. Hunter in person? 8 A Not in person, no. 9 Q So how do you communicate? 10 A Via conference call, via telephone, 11 email. 12 Q And you mentioned in your answer that you 13 would have her share a dataset. What did you mean 14 when you said that? 15 A As part of the vetting process, I asked 16 her to share something that she was allowed to share 17 so that I could see exactly how she extrapolated, 18 you know, whatever insights she shared with me from 19 the project from the dataset itself. 20 Q Understood. 21 Have you ever served as an expert witness 22 before? 23 A I have not. 24 Q So how did you go about putting together 25 a report having never done it before?</p>

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<p style="text-align: right;">Page 34</p> <p>1 A Putting together my expert report? I,</p> <p>2 fortunately, was able to see other expert reports as</p> <p>3 part of this litigation, and I use similar</p> <p>4 formatting.</p> <p>5 Q And what other expert reports did you</p> <p>6 see?</p> <p>7 A Aside from the ones shared with me from</p> <p>8 the experts on the plaintiff's side, none.</p> <p>9 Q So when you said you were able to put</p> <p>10 your report together based on looking at other</p> <p>11 expert reports, you were referring to the expert</p> <p>12 reports that you reviewed in this matter?</p> <p>13 A Correct.</p> <p>14 Q Did you receive any samples of any other</p> <p>15 expert reports?</p> <p>16 A No.</p> <p>17 Q How many hours did you spend on putting</p> <p>18 together the report?</p> <p>19 A The report itself?</p> <p>20 Q Yes.</p> <p>21 A I don't have a breakout of just the</p> <p>22 report.</p> <p>23 Q As opposed to what? Preparing for the</p> <p>24 deposition too?</p> <p>25 A Exactly, based on also doing the data</p>	<p style="text-align: right;">Page 36</p> <p>1 A I don't -- I don't break it out because I</p> <p>2 bill GLG altogether. So I would have to go in and</p> <p>3 dissect the difference between the assistant and</p> <p>4 myself.</p> <p>5 Q And could you do that?</p> <p>6 A If I went into the Excel file, yes.</p> <p>7 Q How would you do that?</p> <p>8 A I have a column that says how much work</p> <p>9 I've done when it comes to total minutes versus how</p> <p>10 much work she's done in total minutes.</p> <p>11 Q Do you have any recollection of how much</p> <p>12 you've done?</p> <p>13 A I would say of that, I would guess it's</p> <p>14 probably about 75 percent or 80 percent.</p> <p>15 Q Is done by you?</p> <p>16 A Correct.</p> <p>17 Q And 20 to 25 by Ms. Hunter?</p> <p>18 A Correct.</p> <p>19 Q Okay. How did you break down who did</p> <p>20 what?</p> <p>21 A So usually, if I have a research</p> <p>22 assistant, I would ask them to do a lot of the</p> <p>23 preparation. So things like the data scraping, the</p> <p>24 Python analysis, and then I would go and check their</p> <p>25 work and then take it from there for the so-what,</p>
<p style="text-align: right;">Page 35</p> <p>1 analysis, doing the report, like, the entire piece</p> <p>2 of work, I don't have a breakout offhand of just the</p> <p>3 report.</p> <p>4 Q Okay. So let's talk about all of those</p> <p>5 things. How much -- how many hours all in have you</p> <p>6 spent doing all of -- everything for this matter?</p> <p>7 A I would have to calculate it. I know how</p> <p>8 much I've billed. I can't tell you the hours.</p> <p>9 Q Okay. How much --</p> <p>10 A I'd just have to back it out.</p> <p>11 Q Let's do that. How much have you billed?</p> <p>12 A I have billed to date \$110,000.</p> <p>13 Q Have you been paid \$110,000?</p> <p>14 A No, I have not.</p> <p>15 Q How much have you been paid?</p> <p>16 A 89,101.</p> <p>17 Q Okay. If we -- I'm going to pull out my</p> <p>18 calculator because I am not a mathematician. So if</p> <p>19 you've billed \$110,000 and you make 650 an hour; is</p> <p>20 that right?</p> <p>21 A Correct.</p> <p>22 Q Okay. So that's about 169 hours; does</p> <p>23 that sound right?</p> <p>24 A Yes, between myself and Taylor.</p> <p>25 Q Oh, I'm just talking about for yourself.</p>	<p style="text-align: right;">Page 37</p> <p>1 now-what. So analyzing some of the -- analyzing</p> <p>2 what -- if it matters, where it's statistically</p> <p>3 significant, what the implications are, things of</p> <p>4 that nature.</p> <p>5 Q Okay. So you said "usually," but what</p> <p>6 about in this case, what did Ms. Hunter do?</p> <p>7 A So, I'm sorry, I shouldn't have said</p> <p>8 "usually." So in this case, that's what she did.</p> <p>9 Q So Ms. Hunter performed the data</p> <p>10 scraping?</p> <p>11 A Correct.</p> <p>12 Q Did you perform any of the data scraping?</p> <p>13 A Data scraping, no.</p> <p>14 Q Who decided, you or Ms. Hunter, what data</p> <p>15 scraping tools to use?</p> <p>16 A I did.</p> <p>17 Q How did you go about deciding what tools</p> <p>18 to use?</p> <p>19 A It's a tool I've used previously.</p> <p>20 Q What is "it"?</p> <p>21 A Apify. And I reference it in my report.</p> <p>22 Q Is Apify a tool or a network of tools?</p> <p>23 A It's a software as a service. And they</p> <p>24 are one of the leaders in social media tracking. So</p> <p>25 they are similar to a Sprout Social or a myriad of</p>

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<p style="text-align: right;">Page 38</p> <p>1 other tools or -- yeah, tools that you're able to go 2 online and scrape from. 3 Q But there are different social media 4 tools for each -- I'm sorry, strike that. 5 There are different actors for various 6 social media tools on Apify, aren't there? 7 MR. FRITZ: Objection. 8 You can answer. 9 THE WITNESS: Yes. 10 BY MS. GOVERNSKI: 11 Q So how did you pick what actors in Apify 12 to use for each of the social media? 13 A I selected the ones that I have used 14 previously. And also, I think one was new and one 15 was just relevant for this particular case. 16 Q And who determined that it was relevant 17 for this case? 18 A I did. 19 Q Okay. And you said you checked work. 20 Please explain how you checked Ms. Hunter's work. 21 A So once she was done doing the data 22 scraping, we had a shared folder, so I would go into 23 that shared folder. I would look at the data that 24 she scraped for, let's say, that day or in total for 25 that particular social media. I would go through,</p>	<p style="text-align: right;">Page 40</p> <p>1 instruction on how to approach it, how to run the 2 data, or how to scrape the data, anything to that 3 effect. 4 Q So the clarifier, though, that came after 5 the data was scraped, right? 6 A That's correct. 7 Q So I'm just talking specifically about 8 data scraping. How did Ms. Hunter know what data 9 she should be looking for? 10 A I gave her keywords. 11 Q What keywords did you give her? 12 A I believe I have them in the report. 13 Q Okay. And that's all that you gave her; 14 you said scrape these keywords? 15 A I said scrape those keywords. And then I 16 asked her to let me know if any other keywords came 17 up that had -- had -- that she saw significantly in 18 the data outside of that. 19 Q Did any other keywords come up? 20 A Nothing that she made note of for a high 21 percentage, no. 22 Q Did you give her any other parameters 23 with respect to the data scraping? 24 A Just the time frame. 25 Q What time frame did you give her?</p>
<p style="text-align: right;">Page 39</p> <p>1 look at the data, make sure that it was complete. 2 When she ran Python code, I would go in and just 3 drop it in to make sure that the Python code ran 4 correctly. Then -- and that it was looking at the 5 correct components. 6 Q And did you ever go back to her and say, 7 I would like you to rerun this or run it a different 8 way? 9 A If there was an error, then yes. 10 Q What kind of an error? 11 A If -- if the -- if the code itself didn't 12 make sense, or if there was anything missing. So 13 maybe she hadn't selected the entire dataset or 14 something to that effect, I would ask her to go back 15 and do a rerun. 16 Q So did you ever ask her to rerun based on 17 the content of the -- of the dataset? 18 A No, not on the content. 19 Q And what were your instructions to 20 Ms. Hunter about what to scrape? 21 A I asked her to look across five different 22 social media channels. I asked her to use both 23 positive, as well as negative, and neutral 24 sentiment. So a three classifier. And that was 25 predominantly it. I didn't give her any specific</p>	<p style="text-align: right;">Page 41</p> <p>1 MR. FRITZ: Objection -- 2 THE WITNESS: I asked her -- 3 MR. FRITZ: -- just let the witness 4 finish, Meryl. Thanks. 5 THE WITNESS: So for the last question, I 6 asked her to look at a one-year time period, 7 ideally, depending on the restrictions that some of 8 the social media -- social media network set. 9 BY MS. GOVERNSKI: 10 Q What do you mean by the restrictions 11 social media sets? 12 A Sometimes there is date limitations for 13 how far they can go back. 14 Q Which networks here had such date 15 limitations? 16 A All of the networks that we ended up 17 looking at were available from January 2024 through 18 October 2025. 19 Q And so was that the time frame that you 20 provided her? 21 A Yes. 22 Q So is it your understanding that 23 Ms. Hunter scraped for all content that hit on the 24 search terms between January 2022 and 2025? 25 A January 2024.</p>

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<p style="text-align: right;">Page 42</p> <p>1 Q I'm sorry. January 2024. Let me ask 2 that question again. 3 So is it your understanding that 4 Ms. Hunter scraped for all data that hit on any of 5 the keywords between January 2024 through 6 October 2025? 7 A Everything that was available via Apify, 8 yes. 9 Q What does that mean, "available via 10 Apify"? 11 A So all data is a little bit of a 12 misnomer. So -- because all data across the social 13 media sites is different than what is available via 14 Apify. So you can only scrape public accounts, 15 so -- which is a -- well, which is a feature of any 16 social media scraping tool. So yes, it should be -- 17 the keywords based on public data from that time 18 frame. 19 Q So it's your understanding that the 20 dataset that Ms. Hunter provided you includes the 21 universe of all data that was publicly available and 22 hit on search terms between January 2024 and 23 October 2025? 24 MR. FRITZ: Objection. 25 THE WITNESS: Yes.</p>	<p style="text-align: right;">Page 44</p> <p>1 MR. FRITZ: Objection. 2 You can answer. 3 THE WITNESS: I'm sorry. Do they 4 change -- does she have the same buckets as I do; is 5 that the question? 6 BY MS. GOVERNSKI: 7 Q Let me ask it a better way. 8 So how would you divide up, from a 9 percentage perspective, the work done on just the 10 data analytics point? 11 A For Taylor, it's 100 percent data 12 analysis. 13 Q Got it. So she -- Ms. Hunter did not 14 help you at all with the report itself? 15 A No, she didn't help me with the writing 16 of the report. 17 Q Okay. Did anyone help you with the 18 writing of the report? 19 A No. 20 Q So you drafted every word of the report? 21 A Yes. 22 Q Were there multiple drafts of the report? 23 A Yes, different versions. 24 Q How many different versions were there? 25 A Arguably, a different version every time</p>
<p style="text-align: right;">Page 43</p> <p>1 BY MS. GOVERNSKI: 2 Q Okay. So I know you said that you were 3 having difficulty remembering the exact breakdown in 4 terms of the hours that you spent on the research 5 versus the writing versus preparing for testimony. 6 Can you give any sort of a proportional breakdown, 7 like 50 percent of your time was doing the 8 analytics, 20 percent was writing? Like, can you do 9 any breakdown like that? 10 A I would say the bulk of the work was the 11 data analysis. 12 Q Uh-huh. 13 A Secondly, was developing the report. 14 And tertiary, it's been preparing for the 15 deposition. 16 Q And 169 hours, that included all of the 17 preparation to date for the depo, right? 18 A Yes, that would be altogether. 19 Q Okay. And in terms of the breakdown 20 between you and Ms. Hunter, you said she did about 21 20 to 25; you did about 75 to 80. Are those 22 percentages the same when we look at different 23 categories; meaning, the analytics work, the report 24 writing, and then the preparing for deposition, or 25 did those proportions change?</p>	<p style="text-align: right;">Page 45</p> <p>1 I open and close the report. So... 2 Q When did you start drafting the report? 3 A I would say eight to ten days before 4 November 3rd. 5 Q Eight to ten days before November 3rd. 6 Let's see, November 3rd is a Friday -- no, a 7 Monday -- 8 A It's a Monday. 9 Q -- so like October 20th, something like 10 that? 11 A Around there. Yes. 12 Q And so was the data analytics completed 13 by October 20th then? 14 A No, there was still some analytics going 15 on, but I began drafting the report. 16 Q Okay. So do you stand by every word in 17 the report? 18 A Yes. 19 Q Did anyone edit your report? 20 A No. 21 Q Did Wayfarer defendants' counsel edit 22 your report in any way? 23 A No. 24 MR. FRITZ: Objection. 25</p>

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<p style="text-align: right;">Page 46</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Did you use artificial intelligence to</p> <p>3 assist in the drafting of the report in any way?</p> <p>4 A So yes, because everything technically</p> <p>5 has AI in it. So I use Google Docs in order to</p> <p>6 develop the report. So Gemini is attached to that,</p> <p>7 and I have Gemini on for my Google Docs --</p> <p>8 Q Can you explain --</p> <p>9 A -- but I did not use generative AI, if</p> <p>10 that's the question.</p> <p>11 Q Can you explain the difference?</p> <p>12 A So AI is the higher level. It is an</p> <p>13 algorithm. Most things that you use, including Zoom</p> <p>14 right now, has AI running in the background in some</p> <p>15 way, shape or form.</p> <p>16 Generative AI is specifically developing</p> <p>17 net new content in creative versus reshaping, copy</p> <p>18 editing, copy writing, things of that nature.</p> <p>19 Q So when you say you did not use</p> <p>20 generative AI, did -- you mean that you did not use</p> <p>21 AI to write the report?</p> <p>22 A I did not use generative AI in any way,</p> <p>23 so...</p> <p>24 Q Even to edit the report?</p> <p>25 MR. FRITZ: Objection.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q And what does a citation that is</p> <p>2 hallucinated look like?</p> <p>3 A I'm not sure exactly how to answer that.</p> <p>4 What does it look like?</p> <p>5 Q Well, is it like the title might be</p> <p>6 wrong, or the authors might be wrong, or the page</p> <p>7 numbers? Like what would it look like?</p> <p>8 MR. FRITZ: Objection.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: So that could just be human</p> <p>11 error. So hallucinations are usually something that</p> <p>12 does not actually exist in real life.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q Okay. So if it, like, adds authors, for</p> <p>15 example, that were not responsible for the</p> <p>16 publication, that could be a hallucination?</p> <p>17 MR. FRITZ: Objection.</p> <p>18 THE WITNESS: It could be, but that's</p> <p>19 not -- it could be a hallucination. However, that</p> <p>20 doesn't mean that it is a hallucination. So I have</p> <p>21 students get footnotes, citations, bibliographies</p> <p>22 incorrect all the time. There's a myriad of</p> <p>23 different reasons. One of those reasons could be a</p> <p>24 hallucination.</p> <p>25 Q And how do you check what the reason is,</p>
<p style="text-align: right;">Page 47</p> <p>1 THE WITNESS: Correct.</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q Your report refers to the concept of</p> <p>4 hallucination and it defines it as "generating</p> <p>5 plausible but factually incorrect information"; is</p> <p>6 that right?</p> <p>7 A Correct.</p> <p>8 Q What does that mean?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 You can answer.</p> <p>11 THE WITNESS: So it means to develop</p> <p>12 something that would come next, based on a high</p> <p>13 propensity that that would be rational and make</p> <p>14 sense with the context that the rest of the sentence</p> <p>15 structure has developed. So it's a -- it's looking</p> <p>16 at statistically does this make sense as the next</p> <p>17 element within that -- within that string of words.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q So what would that look like, you know,</p> <p>20 if you're looking at a paper or something, what</p> <p>21 would a hallucinated content look like?</p> <p>22 A It can look like a myriad of different</p> <p>23 things.</p> <p>24 Q Sometimes are citations hallucinated?</p> <p>25 A Citations can be hallucinated. Yes.</p>	<p style="text-align: right;">Page 49</p> <p>1 as a professor?</p> <p>2 A I mean, I don't normally grade on the</p> <p>3 accuracy of the way that they use references and</p> <p>4 bibliographies. I make sure that they exist, but</p> <p>5 aside from that, I don't necessarily debate if it's</p> <p>6 APA, MLA, or if they've completely gotten it</p> <p>7 accurate.</p> <p>8 Q How do you make sure that they exist?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 THE WITNESS: Normally, one of my CAs or</p> <p>11 TAs will go in and check. It's just part of the</p> <p>12 process I have with them.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q To run it through, like, Google Scholar</p> <p>15 or something like that?</p> <p>16 MR. FRITZ: Objection.</p> <p>17 THE WITNESS: There is different ways of</p> <p>18 checking, so...</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q What are the different ways of checking?</p> <p>21 A It depends on how they submitted it. It</p> <p>22 could be a check system that the university uses.</p> <p>23 It could be through asking for a link, specifically</p> <p>24 if it's an online article or Googling or using</p> <p>25 Google Scholar.</p>

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<p style="text-align: right;">Page 50</p> <p>1 Q When you said a check system that the 2 institution uses, what do you mean? What kind of 3 check system?</p> <p>4 A Most universities, when you submit 5 something as a student, they have different software 6 solution packages that will check to see if there 7 are irregularities.</p> <p>8 Q Are you aware of any software packages 9 that check for irregularities?</p> <p>10 A One is turn it -- Turnitin. That's the 11 only one I can think of offhand.</p> <p>12 Q Have you heard of Grammarly?</p> <p>13 A Yes, I don't know any universities that 14 use that, though, as a check. But yes, I know 15 Grammarly.</p> <p>16 Q What about GPTZero?</p> <p>17 A I don't know that one.</p> <p>18 Q So other than Turnitin, you don't know of 19 any other system checks that universities use to 20 check student papers?</p> <p>21 A No.</p> <p>22 Q Why -- strike that.</p> <p>23 You mentioned the system that you have 24 with your TAs. What system do your TAs use?</p> <p>25 A Depending on how I've set up the -- the</p>	<p style="text-align: right;">Page 52</p> <p>1 AI checkers because AI checkers are not -- they are 2 not accurate at the end of the day. So I don't 3 allow them to use AI checker, just to be clear. I 4 said Turnitin for things like citation that uses 5 probability or Google to actually look up. So they 6 are not AI -- they're not using a AI checker. They 7 are looking up the citation itself.</p> <p>8 Q Okay. Well, what about the content of 9 your students -- well, let me back up for a second. 10 Do you -- you're a professor at NYU and 11 Columbia, right?</p> <p>12 A Correct.</p> <p>13 Q Okay. Do you create your own syllabi for 14 those classes?</p> <p>15 A For the classes that I've created, yes, I 16 create my own syllabi.</p> <p>17 Q Okay. And are those available online at 18 all?</p> <p>19 A The one for Columbia for this semester is 20 definitely.</p> <p>21 Q Okay. And what is the class that you're 22 teaching at Columbia this semester?</p> <p>23 A It is AI and the knowledge organization.</p> <p>24 Q So does your syllabi in that course 25 discuss any academic policies for the class?</p>
<p style="text-align: right;">Page 51</p> <p>1 submission, it would either be Turnitin or via 2 checking through Google --</p> <p>3 Q Do you have --</p> <p>4 A -- I don't specify.</p> <p>5 MR. FRITZ: Objection.</p> <p>6 BY MS. GOVERNSKI:</p> <p>7 Q I'm sorry. I thought you finished. Go 8 on.</p> <p>9 A I don't specify usually.</p> <p>10 Q So you let the TA choose whatever 11 checking system they would want to use?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: The TA or the course 14 associate, yes.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q Okay. And how do you know that you can 17 rely on the outcomes of whatever checking system 18 they've used?</p> <p>19 A I -- I've hired them so I have faith in 20 their ability to -- to make the right checks.</p> <p>21 Q So if they run a student paper through an 22 AI checker and it says there is a high percentage 23 chance likelihood that this is AI, do you believe 24 the checker?</p> <p>25 A No, I don't allow them to run it through</p>	<p style="text-align: right;">Page 53</p> <p>1 A Yes.</p> <p>2 Q Like what?</p> <p>3 MR. FRITZ: Objection.</p> <p>4 Go ahead.</p> <p>5 THE WITNESS: The academic policies are, 6 quite frankly, a cut and paste, so all of the 7 syllabi have the exact same academic policy.</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q When you say "all of the syllabi," it's 10 all of the Columbia syllabi or all of your syllabi?</p> <p>11 A All of the syllabi within the college I 12 teach in has the exact same academic policy.</p> <p>13 Q And how does that syllabi discuss the use 14 of AI, generative AI?</p> <p>15 A So we are allowed to make distinctions on 16 AI specifically. That's the one you want because 17 it's not technically a -- it's not a Columbia-wide 18 policy. So that one, I wouldn't call a policy. 19 That's up to the discretion of each professor.</p> <p>20 Q Okay. So what is your policy?</p> <p>21 A It has to be disclosed.</p> <p>22 Q What has to be disclosed?</p> <p>23 A The use of AI and how the AI was used.</p> <p>24 Q Okay. So how do you enforce that policy?</p> <p>25 A Well, the students usually -- well,</p>

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<p style="text-align: right;">Page 54</p> <p>1 actually, the students for semester have always 2 disclosed. I've asked -- I've given them examples 3 of how to disclose, and that is enforced based on 4 things like if they -- if it appears that someone 5 has used it and hasn't disclosed, I address it with 6 them. If they have submitted something, which 7 didn't happen -- if they have submitted something 8 that appears not to be their work in general -- and, 9 again, there's other reasons for that outside of 10 AI -- then I address that with them as well. 11 Q So you said if it appears like it was 12 created by AI. What are some of the telltale signs 13 of AI usage? 14 A If it appears that they have used -- used 15 frameworks incorrectly, for instance. If they 16 have -- especially ones that maybe show up in -- 17 like an AI overview, if there is any -- if there is 18 any language that they use that just simply is not 19 normally used by them, again, after working with the 20 student for a semester, you know the way that they, 21 number one, communicate, and usually how they write. 22 Q So how do you check whether their 23 material includes generative AI? 24 MR. FRITZ: Objection. 25 You can answer.</p>	<p style="text-align: right;">Page 56</p> <p>1 different signatures that are attributed to AI, 2 which simply don't make sense in real life. So I'm 3 sure you've heard things like using an ampersand. 4 People use ampersands to write, particularly 5 depending on the individual's age, how they were 6 educated, things of that nature. 7 Q You talked about universities checking 8 for AI. Do you know whether the universities for 9 which -- for which you work use AI checkers? 10 A The colleges that I work for within the 11 universities do not use AI checkers for any of the 12 classes I'm aware of. 13 Q So how do colleges discipline individuals 14 if they suspect that a student is using generative 15 AI? 16 MR. FRITZ: Objection. 17 You can answer. 18 THE WITNESS: This is a conversation for 19 the ages across education. So there is no answer to 20 that currently. 21 BY MS. GOVERNSKI: 22 Q So it's your testimony that there are no 23 AI checkers that provide any indicia of the use of 24 generative AIs? 25 MR. FRITZ: Objection.</p>
<p style="text-align: right;">Page 55</p> <p>1 THE WITNESS: Frankly, there is no way to 2 definitively check. 3 BY MS. GOVERNSKI: 4 Q Okay. Not definitively, but do you just 5 take their word for it when they say, "no, I wrote 6 this?" And you don't do any sort of additional 7 checking? 8 MR. FRITZ: Objection. 9 You can answer. 10 THE WITNESS: As I mentioned, it would 11 depend on the case, so what specifically it looked 12 like they did. And then I would understand how to 13 address it appropriately. 14 BY MS. GOVERNSKI: 15 Q So it's all subjective; is that your 16 testimony? 17 MR. FRITZ: Objection. 18 THE WITNESS: Yes. 19 BY MS. GOVERNSKI: 20 Q Okay. So you mentioned that you find AI 21 checkers unreliable. What did you mean by that? 22 A There's actually third-party research 23 that shows that they are not reliable. Depending 24 on -- they take into account things like 25 colloquialisms, the way that you write. There is</p>	<p style="text-align: right;">Page 57</p> <p>1 THE WITNESS: I'm sorry. Could you 2 repeat that? 3 BY MS. GOVERNSKI: 4 Q So it's your testimony that there is no 5 AI checker that can reliably predict the use of 6 generative AI? 7 A Yes, that's my opinion. Yes. 8 Q And what if a student's paper is entered 9 into multiple AI checkers and they all come back 10 with a high percentage of likely to be AI; is that 11 also, in your opinion, not reliable? 12 MR. FRITZ: Objection. 13 THE WITNESS: So to my understanding and 14 the research that I've seen, most AI checkers are 15 all using the same -- the same way of codifying what 16 the assumption of AI is. And, again, this is simply 17 third-party research that I've read. So no, I don't 18 have a trust that AI checkers do an adequate job of 19 definitively, or even statistically significantly 20 proving, that something is AI versus not AI. 21 BY MS. GOVERNSKI: 22 Q Your report includes a number of charts. 23 Who made the charts? 24 A The charts were made by Taylor. 25 Q So earlier when you testified that a</p>

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<p style="text-align: right;">Page 58</p> <p>1 hundred percent of her time was dedicated to the</p> <p>2 data analytics, would that include the work on the</p> <p>3 charts?</p> <p>4 A Yes. So the charts are data analysis.</p> <p>5 Q So how did you -- to what extent did you</p> <p>6 QC the charts?</p> <p>7 A So looking at the charts, I looked at the</p> <p>8 datasets and the code for which she provided that</p> <p>9 generated the visuals to make sure that they were</p> <p>10 accurate.</p> <p>11 Q And when you say "the datasets," those</p> <p>12 are the datasets that Ms. Hunter created using the</p> <p>13 scrapers we talked about?</p> <p>14 A Correct.</p> <p>15 MS. GOVERNSKI: Okay. Let's look at your</p> <p>16 CV. If we pull up your report, we can go to page</p> <p>17 93. And I'm going to ask my colleague, Autumn, to</p> <p>18 share the report on the screen so we can all speak</p> <p>19 the same language.</p> <p>20 Is it -- Autumn, are you able to share?</p> <p>21 Autumn, are you able to share?</p> <p>22 THE A/V TECHNICIAN: It actually looks</p> <p>23 like Autumn is not on the call. Oh, here she is.</p> <p>24 She's rejoining right now.</p> <p>25 MS. GOVERNSKI: I think I can share.</p>	<p style="text-align: right;">Page 60</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: I do not think this is</p> <p>3 the -- sorry, I don't think this is the amended one.</p> <p>4 BY MS. GOVERNSKI:</p> <p>5 Q When did you produce an amended report?</p> <p>6 A I sent the amended report November -- the</p> <p>7 week of November 3rd or the week after.</p> <p>8 MS. GOVERNSKI: Counsel, we have not</p> <p>9 received an amended report. This is the only report</p> <p>10 we've received from Ms. Alexander.</p> <p>11 MR. FRITZ: I will check with my team</p> <p>12 whether that's accurate. You want to take a --</p> <p>13 MS. GOVERNSKI: Yeah, we're going to have</p> <p>14 to, yeah, take a break, because if she's amended her</p> <p>15 report, then we're going to need to consider other</p> <p>16 options.</p> <p>17 MR. FRITZ: Okay. Do you want to take a</p> <p>18 break now?</p> <p>19 MS. GOVERNSKI: Yeah, we're going to go</p> <p>20 off record until you reach a resolution on this.</p> <p>21 MR. FRITZ: Well, why don't we just take</p> <p>22 five minutes?</p> <p>23 MS. GOVERNSKI: We'll take as much time</p> <p>24 until you figure out if there is an amended report</p> <p>25 because I'm not going to continue a deposition if</p>
<p style="text-align: right;">Page 59</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Do you see my screen?</p> <p>3 A Yes.</p> <p>4 Q And this is the expert report that you</p> <p>5 submitted in this case, right?</p> <p>6 MR. FRITZ: Do you want the witness to</p> <p>7 access the document herself so she can scroll</p> <p>8 through it?</p> <p>9 MS. GOVERNSKI: If she wants to.</p> <p>10 MR. FRITZ: Okay.</p> <p>11 Are you able to do that, Ms. Alexander?</p> <p>12 THE WITNESS: I'm downloading it right</p> <p>13 now, yes.</p> <p>14 MS. GOVERNSKI: Do we need to go off</p> <p>15 record for you to review it, or are you able to take</p> <p>16 a look and let me know if this is your expert</p> <p>17 report?</p> <p>18 MR. FRITZ: She'll -- we'll stay on</p> <p>19 record and she will review it to ensure that it is</p> <p>20 what you say that it is.</p> <p>21 THE WITNESS: I just want to confirm that</p> <p>22 this is the amended report.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q Is it your testimony that you've provided</p> <p>25 an amended report?</p>	<p style="text-align: right;">Page 61</p> <p>1 she -- if this report is not her current report, so</p> <p>2 let's go off the record.</p> <p>3 MR. FRITZ: How would you like me to get</p> <p>4 back to you, on the Zoom?</p> <p>5 MS. GOVERNSKI: Sure.</p> <p>6 MR. FRITZ: All right.</p> <p>7 THE VIDEOGRAPHER: We're off the record.</p> <p>8 It's 12:00 p.m.</p> <p>9 (Recess.)</p> <p>10 THE VIDEOGRAPHER: We're back on the</p> <p>11 record. It's 12:09 p.m.</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q Okay, Ms. Alexander, the report that I</p> <p>14 previously entered as 001 was the original report</p> <p>15 that you produced in this matter, right?</p> <p>16 A I can't confirm that. I -- I just looked</p> <p>17 for the amended report. So...</p> <p>18 Q Okay. Can you please open the report</p> <p>19 that I marked as 001 and confirm that was the</p> <p>20 original report that you provided?</p> <p>21 A Yes, it is.</p> <p>22 MS. GOVERNSKI: And I've introduced</p> <p>23 Exhibit 2, which you should see in the folder, which</p> <p>24 is the amended report.</p> <p>25 (Exhibit 2 marked for identification.)</p>

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<p style="text-align: right;">Page 62</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Do you see that?</p> <p>3 A Can I -- I didn't receive the link</p> <p>4 originally, so someone shared it at the top of this</p> <p>5 hour. Can -- since he closed out the Zoom, I don't</p> <p>6 have the link anymore.</p> <p>7 Q You don't have the link to the Exhibit</p> <p>8 Share?</p> <p>9 A No. When I exited Zoom, the chat</p> <p>10 functionality went away.</p> <p>11 MS. GOVERNSKI: Okay. Let's go off the</p> <p>12 record.</p> <p>13 THE VIDEOGRAPHER: Off the record. It's</p> <p>14 12:11 p.m.</p> <p>15 (Recess.)</p> <p>16 THE VIDEOGRAPHER: We're back on the</p> <p>17 record. It's 12:12 p.m. Thank you.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Ms. Alexander, is the second item, what</p> <p>20 I've marked as Exhibit 002, the amended report in</p> <p>21 this matter?</p> <p>22 A It is.</p> <p>23 Q Why did you amend your report?</p> <p>24 A I found two -- two elements in the</p> <p>25 original report that were a problem with the</p>	<p style="text-align: right;">Page 64</p> <p>1 practitioner and an expert focus?</p> <p>2 A So I would say this would be more</p> <p>3 academic-focused, what you're seeing in Exhibit 2.</p> <p>4 So it's giving additional information around my</p> <p>5 speaking engagements, my book. I think those are</p> <p>6 the key differences. And then chronologically, just</p> <p>7 where you place -- where I placed information.</p> <p>8 Q So what are some of the differences in</p> <p>9 this CV versus your regular one?</p> <p>10 A Let's see. It is -- sorry, I just have</p> <p>11 to get down to that page. It would be, as I</p> <p>12 mentioned, the detail of my speaking engagements.</p> <p>13 That's not in my practitioner CV. I don't have my</p> <p>14 book in my practitioner CV.</p> <p>15 Q Why don't you have your book in your</p> <p>16 practitioner CV?</p> <p>17 A Well, I haven't added it because I</p> <p>18 haven't needed to. But usually, you wouldn't</p> <p>19 necessarily put that in a practitioner CV.</p> <p>20 Q Why not?</p> <p>21 MR. FRITZ: Objection.</p> <p>22 You can answer.</p> <p>23 THE WITNESS: It's not the norm.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q Did you modify your short bio in any way?</p>
<p style="text-align: right;">Page 63</p> <p>1 visualization and a reference to one of the standard</p> <p>2 deviations.</p> <p>3 Q Okay. We will get to that in a moment,</p> <p>4 but I would like to get -- direct your attention in</p> <p>5 002 to your CV, which is Appendix A. Did you make</p> <p>6 changes to Appendix A between the first and second</p> <p>7 report?</p> <p>8 A No, I don't believe so.</p> <p>9 Q Okay. And if I refer to the "first</p> <p>10 report," you understand that's the Exhibit 001, and</p> <p>11 if I refer to the "amended report," you will</p> <p>12 understand that's 002?</p> <p>13 A Yes.</p> <p>14 Q Did you draft this CV?</p> <p>15 A Yes.</p> <p>16 Q When did you draft this?</p> <p>17 A It's an adaptation of my normal CV, so I</p> <p>18 adapted it for this report.</p> <p>19 Q Why did you adapt it?</p> <p>20 A Just because my regular CV is -- is more</p> <p>21 practitioner-focused --</p> <p>22 Q Sorry, you were saying more</p> <p>23 practitioner-focused?</p> <p>24 A Yes.</p> <p>25 Q What is the difference between a</p>	<p style="text-align: right;">Page 65</p> <p>1 A Probably, yes.</p> <p>2 Q Who -- how did you decide to modify your</p> <p>3 CV?</p> <p>4 A My overall CV; is that the question, or</p> <p>5 the short bio?</p> <p>6 Q Oh, sorry. The overall CV.</p> <p>7 A I did it the way I would do it for</p> <p>8 academia. So this is more similar to my academic</p> <p>9 CV.</p> <p>10 Q Why didn't you use your academic CV?</p> <p>11 A Because it's outdated. I haven't updated</p> <p>12 it.</p> <p>13 Q I see. You were just updating your</p> <p>14 academic CV?</p> <p>15 A Yes. So I would normally take this and I</p> <p>16 would copy it to my academic CV moving forward.</p> <p>17 Q Did anyone at Liner Freedman assist you</p> <p>18 in editing this CV in any way?</p> <p>19 A No.</p> <p>20 MR. FRITZ: Instruct the witness not to</p> <p>21 answer questions designed to disclose</p> <p>22 attorney-client privilege.</p> <p>23 MS. GOVERNSKI: Is --</p> <p>24 MR. FRITZ: Sorry. I wasn't finished</p> <p>25 with my objection. Attorney-client privilege.</p>

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<p style="text-align: right;">Page 66</p> <p>1 MS. GOVERNSKI: It was a speaking 2 objection. 3 MR. FRITZ: Sorry. I wasn't finished. I 4 would just caution the witness not to disclose any 5 information that would be protected from disclosure 6 by the attorney-client privilege. 7 BY MS. GOVERNSKI: 8 Q Is all of the information in this CV 9 accurate? 10 A So let me just go back to the CV. I 11 apologize. I had my local one open and not this 12 one. 13 Yes. Everything is accurate. 14 Q I should have asked. Do you have 15 anything else open on your computer right now? 16 A No, no. Just my -- my original report, 17 the one I didn't download. So I closed that. 18 Q Okay. So when you were looking at your 19 local CV, you were looking at a copy other than what 20 is in either of the reports? 21 A No. I had the amended report that was 22 not downloaded, that's sitting on my desktop. I had 23 that open in order to answer the earlier question of 24 is this different, is this amended or not amended. 25 So I've subsequently closed that. So I just want to</p>	<p style="text-align: right;">Page 68</p> <p>1 A Yeah. So it says "Current NYU 2 Professor." That actually is probably the outdated. 3 It should say "Current Columbia Professor," excuse 4 me. 5 Q You no longer teach at NYU? 6 A I am not currently teaching there, no. I 7 finished teaching the semester at Columbia. 8 Q When did you stop teaching at NYU? 9 A My last -- the last time I taught was 10 2022. I'm sorry. The last time I taught a full 11 semester course was 2022. 12 Q Okay. Well, what have you taught since 13 then at NYU? 14 A I teach, like, seminars depending on if 15 they need me. 16 Q Like one-off seminars or courses? 17 A No. One-off seminars. 18 Q And that's considered being a professor 19 there? 20 MR. FRITZ: Objection. 21 THE WITNESS: Yes. 22 BY MS. GOVERNSKI: 23 Q Okay. How many seminars have you taught 24 since 2022? 25 A For NYU, I don't know. I would say</p>
<p style="text-align: right;">Page 67</p> <p>1 make sure I was looking at the correct document. 2 I'm now looking at the document, Exhibit 2, that I 3 downloaded. 4 Q Okay. You've testified there is no 5 difference between the CV in the original report and 6 the CV in the amended report, right? 7 A I don't believe there is. I'm just 8 looking at Exhibit 2 right now. 9 Q Okay. So what in the short bio, speaking 10 just about the short bio -- I'm going to go ahead 11 and share my screen for 002 just to speed this up 12 and make sure we're talking from the same document. 13 Do you see what is on my screen? 14 A Yes. Can you just zoom in a little bit? 15 Yes. 16 Q So what in this short bio is different 17 here as compared to what you've called your regular 18 CV? 19 A All the content is identical. I may 20 verbalize it slightly differently, but it's pretty 21 much the same. 22 Q Okay. Your CV says that you -- oh, 23 sorry. 24 Everything in this short bio is 25 accurate -- is accurate?</p>	<p style="text-align: right;">Page 69</p> <p>1 three, both -- maybe three. 2 Q Okay. And how many courses -- how many 3 times did you teach a full semester course at NYU? 4 A How many times? Like over the years? 5 Q Yeah. A full semester course. 6 A I don't know. I would have to check. 7 Q Okay. At least 15, you think? 8 A Not sure. I would rather just check to 9 make sure I'm accurate. 10 Q Why did you stop teaching full-semester 11 courses at NYU? 12 A No particular reason. Mostly because I 13 was working full-time as well. So... 14 Q Okay. So when you say -- when the short 15 bio says "Current NYU Professor", that is not 16 accurate? 17 MR. FRITZ: Objection. You can answer. 18 THE WITNESS: I'm not actively teaching, 19 correct. 20 BY MS. GOVERNSKI: 21 Q Okay. And when your academic 22 appointments right below says: 23 (As read): 24 "Adjunct Professor of Marketing 25 Technology, NYU, 2013 to present," is</p>

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<p style="text-align: right;">Page 70</p> <p>1 that accurate?</p> <p>2 A So as an adjunct, you can come in and</p> <p>3 teach one semester, skip three years, come back,</p> <p>4 teach another semester. That's the whole point of</p> <p>5 being an adjunct.</p> <p>6 Q Got it. So when it says "2013 to</p> <p>7 present," it's just in case you come back to teach a</p> <p>8 full-semester course in the future?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 THE WITNESS: Correct.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q So you would consider yourself a current</p> <p>13 Adjunct Professor of Marketing and Technology at</p> <p>14 NYU?</p> <p>15 A Yes.</p> <p>16 Q Okay. And what about at Columbia</p> <p>17 University? Are you a current professor at Columbia</p> <p>18 University?</p> <p>19 A Yes.</p> <p>20 Q How many courses do you currently teach</p> <p>21 at Columbia?</p> <p>22 A The semester just ended. But one,</p> <p>23 normally.</p> <p>24 Q And how many credits is that course for?</p> <p>25 A I'm not sure. I would guess three.</p>	<p style="text-align: right;">Page 72</p> <p>1 THE WITNESS: It is looking at leadership</p> <p>2 skills, understanding how to manage. I had a focus</p> <p>3 in marketing. So quite frankly, I remember more of</p> <p>4 the marketing courses than the other courses for a</p> <p>5 Bachelor's degree.</p> <p>6 BY MS. GOVERNSKI:</p> <p>7 Q Okay. I'm going to share my screen</p> <p>8 again, actually. So when you say here: "B.S.</p> <p>9 Leadership in Management, NYU", it doesn't mention</p> <p>10 marketing, right?</p> <p>11 A I didn't list my concentration. No.</p> <p>12 Q Okay. What does a concentration mean at</p> <p>13 NYU?</p> <p>14 MR. FRITZ: Objection. You can answer.</p> <p>15 THE WITNESS: I believe for any</p> <p>16 undergraduate degree, it's what your focus is that</p> <p>17 you decide to focus in.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Does your degree show a concentration in</p> <p>20 marketing?</p> <p>21 A On the paperwork, I'm not sure.</p> <p>22 Q And is Leadership and Management the</p> <p>23 major? Is that what it's called?</p> <p>24 A Leadership and Management is the degree.</p> <p>25 Q That's the degree. Okay. How is a</p>
<p style="text-align: right;">Page 71</p> <p>1 Q Okay. How many times a week does that</p> <p>2 course meet?</p> <p>3 A Once a week.</p> <p>4 Q Is this the right title of that course?</p> <p>5 "Teaching AI for the Knowledge Driven Organization"?</p> <p>6 A Yes. Correct.</p> <p>7 Q What does that course teach?</p> <p>8 A It teaches practitioners or future</p> <p>9 practitioners about how to look at AI from a</p> <p>10 strategic perspective, from an executionary</p> <p>11 perspective; how to think about the technology side</p> <p>12 as well as the business implications.</p> <p>13 Q Okay. I'm going to go off of this for --</p> <p>14 I'm just going to stop the share for a second.</p> <p>15 Your CV lists a Bachelor's of Science</p> <p>16 from NYU with a degree in Leadership Management; is</p> <p>17 that right?</p> <p>18 A Correct.</p> <p>19 Q When did you graduate from NYU?</p> <p>20 A With my Bachelor's degree?</p> <p>21 Q Yes.</p> <p>22 A 2012.</p> <p>23 Q What is a degree in Leadership and</p> <p>24 Management?</p> <p>25 MR. FRITZ: Objection. You can answer.</p>	<p style="text-align: right;">Page 73</p> <p>1 degree in Leadership and Management relevant to your</p> <p>2 assignment in this case?</p> <p>3 A I'm not sure.</p> <p>4 Q Is it relevant to your assignment in this</p> <p>5 case?</p> <p>6 MR. FRITZ: Objection.</p> <p>7 THE WITNESS: I look at it like my life</p> <p>8 skills, my education, all culminates to who I am</p> <p>9 now. So I would say yes.</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q But your particular degree in Leadership</p> <p>12 and Management, how is that specific degree relevant</p> <p>13 to your assignment in this case?</p> <p>14 MR. FRITZ: Objection. You can answer</p> <p>15 again.</p> <p>16 THE WITNESS: I think that the focus that</p> <p>17 I had around marketing is relevant to the jobs that</p> <p>18 I've taken, as well as my role as an expert in this</p> <p>19 case.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Okay. So it's relevant to the extent</p> <p>22 that it afforded you access to jobs in marketing,</p> <p>23 which then informed your opinion in this case; is</p> <p>24 that right?</p> <p>25 MR. FRITZ: Objection. You can answer</p>

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<p style="text-align: right;">Page 74</p> <p>1 again.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Okay. And then your CV also lists an MST</p> <p>5 in Artificial Intelligence Ethics and Society.</p> <p>6 What kind of a degree is that?</p> <p>7 A It's a graduate degree at the University</p> <p>8 of Cambridge.</p> <p>9 Q Okay. MST, that's a Master of -- what</p> <p>10 does ST stand for?</p> <p>11 A Studies.</p> <p>12 Q And did you -- it doesn't list a date.</p> <p>13 When did you attend Cambridge?</p> <p>14 A 2023 to 2025.</p> <p>15 Q So you just received that degree?</p> <p>16 A I did.</p> <p>17 Q When did you receive it?</p> <p>18 A We were -- my class was conferred over</p> <p>19 the summer sometime.</p> <p>20 Q Okay. Did you move to Cambridge for this</p> <p>21 program?</p> <p>22 A I did not.</p> <p>23 Q So how did you receive this degree from</p> <p>24 Cambridge?</p> <p>25 MR. FRITZ: Objection.</p>	<p style="text-align: right;">Page 76</p> <p>1 degree.</p> <p>2 MR. FRITZ: Objection. You can answer.</p> <p>3 THE WITNESS: We looked at things such as</p> <p>4 how LLMs are created, some of the biases that go</p> <p>5 into LLM, based on the datasets; how LLMs are</p> <p>6 developed and built. Everything from the natural</p> <p>7 language processing, through fine tuning the LLM.</p> <p>8 We also look at things like small language models as</p> <p>9 well. There is a lot. I'm not sure specifically</p> <p>10 what to highlight.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q How many courses did you take in those</p> <p>13 aspects specifically, what you just described?</p> <p>14 A So they are not individual courses the</p> <p>15 same way you would think of in an undergraduate</p> <p>16 degree. They are interwoven into each of the</p> <p>17 different semesters.</p> <p>18 Q So there are no courses. It's just a</p> <p>19 general kind of programming; is that right?</p> <p>20 A It's programming. Yes.</p> <p>21 Q So how many classes were specifically on</p> <p>22 what we just discussed in terms of LLMs and how they</p> <p>23 are created, et cetera?</p> <p>24 A It came up in each program that we walk</p> <p>25 through.</p>
<p style="text-align: right;">Page 75</p> <p>1 THE WITNESS: How did I study? Is that</p> <p>2 the question?</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Yeah. Was it a remote virtual program?</p> <p>5 I'm just trying to understand how you took courses.</p> <p>6 A It was part-time. So it was hybrid.</p> <p>7 That's why it's a Master's of Studies and not a</p> <p>8 Master's of Philosophy. So M-Phil is for full-time</p> <p>9 students. Master's of Studies is for part-time</p> <p>10 hybrid students.</p> <p>11 Q Okay. So that's why you were -- it took</p> <p>12 you from 2023 to 2025. That was the two years</p> <p>13 because it was a part-time program?</p> <p>14 A Correct.</p> <p>15 Q Okay. And so what is a Master's in</p> <p>16 Artificial Intelligence Ethics in Society?</p> <p>17 A So we study the roots of AI from a power</p> <p>18 philosophy perspective. We also talk about -- we</p> <p>19 look at insights around how AI has developed; the</p> <p>20 uses of AI particularly across, you know, public</p> <p>21 society, organizations, government.</p> <p>22 Q So do you as part of this program study</p> <p>23 AI technology itself?</p> <p>24 A Yes.</p> <p>25 Q So tell me about those aspects of the</p>	<p style="text-align: right;">Page 77</p> <p>1 Q What does the program look like? How</p> <p>2 many times a week were you in school for this</p> <p>3 degree?</p> <p>4 A In school? I'm sorry.</p> <p>5 Q In classes?</p> <p>6 MR. FRITZ: Objection. You can answer.</p> <p>7 THE WITNESS: So there is a specific</p> <p>8 amount of classroom hours that any degree granting</p> <p>9 has to have. I don't know what that is offhand. I</p> <p>10 was physically in Cambridge around two weeks. Every</p> <p>11 quarter -- or every term, excuse me, they use a</p> <p>12 different verbiage. Every term. And then there was</p> <p>13 remote work where we had to log on. So long story</p> <p>14 short, I'm not sure offhand.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q So you're not sure how many total hours</p> <p>17 you needed to participate in order to receive that</p> <p>18 degree?</p> <p>19 MR. FRITZ: Objection. You can answer</p> <p>20 again.</p> <p>21 MS. GOVERNSKI: Sorry. I didn't hear</p> <p>22 your answer.</p> <p>23 THE WITNESS: I'm not sure offhand.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q Any ballpark?</p>

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<p style="text-align: right;">Page 78</p> <p>1 A I wouldn't venture to guess. Over 2 two years. I'm not sure. 3 Q Was it sporadic or something you did 4 every week? 5 A No. It was done every week. 6 Q And to what extent is your Master's of 7 Studies degree in Artificial Intelligence Ethics and 8 Society relevant to your assignment in this case? 9 A It gives me a deeper understanding of 10 specifically how LLMs operate. Understanding how 11 looking at the -- the ethics or the elements around 12 AI, particularly around things like manipulation 13 across social media, which was specifically one of 14 my areas of study. How that all culminates. How to 15 think about identifiers. And how AI is leveraged, 16 pro or con, in marketing. 17 Q And all of the other experience in your 18 CV predated the receipt of this degree, right? 19 A I'm sorry. Could you repeat that? 20 MR. FRITZ: Objection. 21 MS. GOVERNSKI: I will withdraw the 22 question. 23 BY MS. GOVERNSKI: 24 Q Your CV also lists an executive MBA. 25 What is an executive MBA?</p>	<p style="text-align: right;">Page 80</p> <p>1 A No. 2 MR. FRITZ: Objection. 3 THE WITNESS: No, it's not a ten-week 4 program. 5 BY MS. GOVERNSKI: 6 Q Okay. So online, when they describe it 7 as a ten-week program, that's not accurate? 8 MR. FRITZ: Objection. 9 THE WITNESS: I don't believe they 10 describe it as a ten-week program. It may be stated 11 as ten weeks in-person, but it's not a ten-week 12 program. 13 BY MS. GOVERNSKI: 14 Q Understood. So how many weeks is the 15 full program, do you think? 16 A I believe it's 18 months. 17 Q A full-time program over 18 months? 18 MR. FRITZ: Objection. 19 THE WITNESS: It's not full-time because 20 it's targeted to executives. So it is literally 21 formatted for individuals who are usually executives 22 within their organization. So it's 18 months, I 23 believe, start to finish. 24 BY MS. GOVERNSKI: 25 Q And to what extent is your executive MBA</p>
<p style="text-align: right;">Page 79</p> <p>1 A It's a MBA but for executives. It 2 doesn't really answer the question. 3 It is a part-time MBA that is targeted 4 specifically to usually executives with a certain 5 amount of years of experience to help them get 6 additional knowledge for business. 7 Q When did you receive this degree? 8 A 2014. 9 Q It talks about it being a joint degree. 10 Where were you physically located when you obtained 11 this degree? 12 A During the 18 months of study, I was in 13 Paris, Chennai, India, Shanghai, China, New York, 14 and -- did I say London and Paris? 15 Q Okay. And you said over 18 months. 16 About how many weeks would you say that you spent on 17 this program before you obtained the degree? 18 A Weeks of working towards the degree or 19 weeks of travel? 20 Q Weeks of working towards the degree. 21 A It was aggressive. I would say probably 22 20 hours a week. 23 Q For how many weeks? 24 A Over the course of the degree. 25 Q But it's a ten-week program, isn't it?</p>	<p style="text-align: right;">Page 81</p> <p>1 relevant to your assignment in this case? 2 A It has allowed me to understand -- again, 3 my focus was on data analytics as part of that 4 degree. So it gave me both a finance perspective, 5 it's given me depth in strategy in particular, as 6 well as marketing. 7 Q When you refer to data analytics, that's 8 not listed as part of this degree on your CV, right? 9 A Data analytics is part of the executive 10 MBA. It's actually part of the NYU module. 11 Q Okay. So how did -- how was it part of 12 your executive MBA? 13 A It's a class. 14 Q How long was the class? 15 A It's for the term. So 14 weeks. 16 Q Okay. So a 14-week class in data 17 analytics. Was there anything else part of this 18 executive MBA during which you learned about data 19 analytics? 20 A Data analytics was integrated within 21 other parts as well that weren't actually called 22 data analytics as a class. So we had finance 23 analytics, which looks at a myriad of different 24 data. We also had strategy classes that also 25 incorporated data analysis.</p>

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<p style="text-align: right;">Page 82</p> <p>1 Q What is data analytics?</p> <p>2 A Looking at data, and it depends on how</p> <p>3 big you want to -- cleaning, sorting, aggregating</p> <p>4 data in order to provide an informed decision on</p> <p>5 what that data tells you.</p> <p>6 Q Okay. None of these three degrees you</p> <p>7 list here reflect that you have a degree in data</p> <p>8 analytics, right?</p> <p>9 MR. FRITZ: Objection. You can answer.</p> <p>10 THE WITNESS: None of the degrees are</p> <p>11 called data analytics.</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q Are these three entries the extent of the</p> <p>14 degrees that you possess?</p> <p>15 A Degrees, yes.</p> <p>16 Q Are you familiar with the term,</p> <p>17 "computational social sciences"?</p> <p>18 A Yes.</p> <p>19 Q Computational social sciences also is not</p> <p>20 mentioned here; is that right?</p> <p>21 A Correct. I don't have a degree in it.</p> <p>22 Q What are computational social sciences?</p> <p>23 A I don't know how I would define that.</p> <p>24 Q Can you try?</p> <p>25 A I'm not sure.</p>	<p style="text-align: right;">Page 84</p> <p>1 Q Do you have a degree in digital</p> <p>2 marketing?</p> <p>3 A The degree is not listed as digital</p> <p>4 marketing. No.</p> <p>5 Q Your CV talks about you being at Meta.</p> <p>6 You were at Meta for two years?</p> <p>7 A Two years, six months.</p> <p>8 Q It talks about Global Head of Marketing,</p> <p>9 Business and Product Marketing. Were you -- that's</p> <p>10 of all of Meta?</p> <p>11 A That's of the Business and Product</p> <p>12 Marketing division. So I was on the side of what</p> <p>13 most people would refer to as B2B.</p> <p>14 Q Can you explain what B2B means, other</p> <p>15 than the literal definition? What is that?</p> <p>16 A Business to business. So Meta works --</p> <p>17 Meta has goods and services that they promote to</p> <p>18 consumers, such as you, Kevin, et cetera. So people</p> <p>19 that use Facebook, WhatsApp, a myriad of different</p> <p>20 solutions. That's what we call the B2B side.</p> <p>21 B2B is about working with the</p> <p>22 advertisers, small to medium businesses. Things of</p> <p>23 that nature.</p> <p>24 Q And what did you do from a day-to-day</p> <p>25 perspective as a Global Head of Marketing Business</p>
<p style="text-align: right;">Page 83</p> <p>1 Q Can you try?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Do you know what computational social</p> <p>5 science means?</p> <p>6 MR. FRITZ: Objection. You can answer.</p> <p>7 THE WITNESS: It's an interdisciplinary</p> <p>8 field. It looks at analyzing large scale datasets.</p> <p>9 That's how I would describe it.</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q An interdisciplinary of what disciplines?</p> <p>12 A Computer science, data science, and I'm</p> <p>13 sure there is another science in there. Those are</p> <p>14 the two I can think of.</p> <p>15 Q Do you have a degree in computer science?</p> <p>16 A I don't have a degree in comp-sci.</p> <p>17 Q Do you have a degree in data science?</p> <p>18 A I don't have a degree in data science.</p> <p>19 Q What about mathematics? Do you have a</p> <p>20 degree in mathematics?</p> <p>21 A I don't have a degree in mathematics.</p> <p>22 Q What about statistics?</p> <p>23 A I do not.</p> <p>24 Q What about economics?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 85</p> <p>1 and Product Marketing?</p> <p>2 A I ran a couple of different teams that</p> <p>3 include data analytics, engineering, owned -- the</p> <p>4 owned services team. So that is all the things like</p> <p>5 e-mail, social media, website. And my goal was to,</p> <p>6 number one, maintain our site on the business side;</p> <p>7 ensure that clients or potential customers were able</p> <p>8 to find what they needed. I also had revenue stream</p> <p>9 goals. So making sure that we were converting</p> <p>10 potential customers into active customers. And then</p> <p>11 a myriad of promotional activities. Yeah. That's</p> <p>12 the gist.</p> <p>13 MR. FRITZ: Objection.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q Why did you --</p> <p>16 Why did you leave in 2023?</p> <p>17 A There were changes in the organization so</p> <p>18 I decided it was a good time for me to depart.</p> <p>19 Q So it was a voluntary departure?</p> <p>20 A Yes, correct.</p> <p>21 Q Who did you report to while you were</p> <p>22 there?</p> <p>23 A I reported to the SV -- I'm sorry. I</p> <p>24 reported to the VP, her role then was VP of -- I'm</p> <p>25 going to say Skilled Solutions. But I'm not sure if</p>

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<p style="text-align: right;">Page 86</p> <p>1 that's the overarching name.</p> <p>2 Q You've referenced having direct reports.</p> <p>3 How many direct reports did you have?</p> <p>4 A Direct reports, I had 15 at the highest.</p> <p>5 Q And you mentioned data analytics, but</p> <p>6 this description doesn't mention data analytics.</p> <p>7 Why doesn't it include that?</p> <p>8 A I didn't put it in there. But most of my</p> <p>9 job was around data analysis, data analytics.</p> <p>10 Q Why have you mentioned that describing</p> <p>11 this role when it wasn't in your CV?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: I'm sorry. Can you repeat</p> <p>14 that?</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q Yeah, I'm just saying you've volunteered</p> <p>17 data analytics as part of this position, but it's</p> <p>18 not mentioned in your CV. I'm just wondering why</p> <p>19 you mentioned it when it's not listed in your CV.</p> <p>20 A I volunteered it as one of the teams that</p> <p>21 I oversaw.</p> <p>22 Q How did you oversee that team?</p> <p>23 MR. FRITZ: Objection.</p> <p>24 THE WITNESS: It was one of the teams</p> <p>25 that sat under my purview. So it's actually one of</p>	<p style="text-align: right;">Page 88</p> <p>1 A Yes.</p> <p>2 Q What type of specific data was the data</p> <p>3 analytics team that you supervised performing?</p> <p>4 A They would run -- we would look at things</p> <p>5 like social graph, click stream data. We would look</p> <p>6 at potential threats across our network.</p> <p>7 Q What does potential threats mean?</p> <p>8 A It could mean anything from bots to DDS.</p> <p>9 Someone trying to access our network. To -- it was</p> <p>10 predominantly around things like bots, click flow</p> <p>11 traffic, reporting to see if these were -- if we</p> <p>12 were on target to hit revenue goals, usage behavior.</p> <p>13 Things of that nature.</p> <p>14 Q Describe your experience with bots while</p> <p>15 you were at Meta.</p> <p>16 A Part of the work that we did was to look</p> <p>17 at bot activities specifically across when it came</p> <p>18 to clients. So specifically if there were accounts</p> <p>19 that were -- accounts that looked like there were --</p> <p>20 that bots were used in order to spike traffic,</p> <p>21 whereas clients had to then pay for said traffic, we</p> <p>22 would do forensics work around if that traffic was</p> <p>23 realized, if it was associated with users, or if it</p> <p>24 was non-organic.</p> <p>25 Q Okay. You use the term "non-organic."</p>
<p style="text-align: right;">Page 87</p> <p>1 the teams I developed while I was there.</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q Tell me about that.</p> <p>4 MR. FRITZ: Objection.</p> <p>5 THE WITNESS: So in order to lead our</p> <p>6 owned properties we specifically had to have</p> <p>7 insights on how data was captured; how data was</p> <p>8 cleaned; how we were aggregating data; how we were</p> <p>9 using data. And then ensuring that it was not only</p> <p>10 responsible, but also in line with Meta's overall</p> <p>11 policies. So I had a team of data analysts that did</p> <p>12 all of that work.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q How much of that work did you perform</p> <p>15 yourself?</p> <p>16 A On an ongoing basis for what they did to</p> <p>17 what I performed, marginal.</p> <p>18 Q Okay. There is a data analytics team</p> <p>19 separate from one under the marketing department at</p> <p>20 Meta, isn't there?</p> <p>21 A There are a lot of data analytics teams</p> <p>22 at Meta.</p> <p>23 Q Got it. So when you talk about running a</p> <p>24 data analytics team, that's a specific team that you</p> <p>25 created in the marketing department?</p>	<p style="text-align: right;">Page 89</p> <p>1 What does non-organic mean?</p> <p>2 A Non-organic means that it doesn't have</p> <p>3 qualifiers. That would mean that users actually</p> <p>4 were the ones that generated the traffic.</p> <p>5 Q So when you use the term "non-organic",</p> <p>6 you're referring to automated conduct like the use</p> <p>7 of bots?</p> <p>8 A It could be bots or it could be other</p> <p>9 things as well.</p> <p>10 Q What other things?</p> <p>11 A It could be users of -- coordinated</p> <p>12 actual users attempting to spike traffic or to, in a</p> <p>13 negative or positive way, manipulate the traffic</p> <p>14 somehow.</p> <p>15 Q So users coordinating to spike traffic</p> <p>16 would be non-organic?</p> <p>17 A That would be non-organic. We wouldn't</p> <p>18 classify it as that. Internally, we would classify</p> <p>19 it as sort of -- we use words like maleficent, but</p> <p>20 that makes no sense in the real world. So it would</p> <p>21 be something that would be a coordinated</p> <p>22 manipulation pretty much.</p> <p>23 Q So you didn't use the term "organic"</p> <p>24 while at Meta?</p> <p>25 A We used organic but not in the sense that</p>

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<p style="text-align: right;">Page 90</p> <p>1 we're discussing here.</p> <p>2 Q So how are we discussing organic in the</p> <p>3 sense here?</p> <p>4 A So I believe that when you brought up how</p> <p>5 we used it, it was in regards to data analytics</p> <p>6 for -- around bot traffic. We used organic more</p> <p>7 from where the origin of traffic came from. So for</p> <p>8 instance, organic versus paid in an advertising</p> <p>9 perspective.</p> <p>10 Q I see. So you use the term non-organic</p> <p>11 to describe the use of bots so how were you using</p> <p>12 that term?</p> <p>13 MR. FRITZ: Objection.</p> <p>14 THE WITNESS: Sorry. So non-organic, I'm</p> <p>15 using it that it is a coordinated sort of</p> <p>16 manipulation in some way, shape or form, whether</p> <p>17 through technology or through humans.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q But that is not how you would use the</p> <p>20 term when you were at Meta?</p> <p>21 A Every company has their own verbiage. I</p> <p>22 would use Meta's verbiage internally.</p> <p>23 MS. GOVERNSKI: Okay. Let's look at</p> <p>24 Meta's verbiage. I'm going to put into the Exhibit</p> <p>25 Share what I will mark as Exhibit 3. Autumn, are</p>	<p style="text-align: right;">Page 92</p> <p>1 that, we would form a baseline. So things outside</p> <p>2 of that baseline would be things that were -- that</p> <p>3 we would check to see why the traffic or whatever</p> <p>4 the activity was, was skewed.</p> <p>5 BY MS. GOVERNSKI:</p> <p>6 Q Okay. So when you used the term earlier</p> <p>7 "non-organic" how, if at all, does that relate to</p> <p>8 inauthentic behavior?</p> <p>9 A From the way that we use that at Meta, it</p> <p>10 could be a synonym.</p> <p>11 Q What about the way that you use the term</p> <p>12 organic in your report, to what extent does the way</p> <p>13 that you use the term organic in your report</p> <p>14 coincide with inauthentic behavior?</p> <p>15 A I didn't associate the use of inorganic</p> <p>16 in my report with anything, any verbiage related to</p> <p>17 Meta, for instance.</p> <p>18 Q What did you associate the use of organic</p> <p>19 in your report to?</p> <p>20 A In my report, I specifically look at</p> <p>21 organic behavior, being things within the norm that</p> <p>22 didn't have classifiers of inorganic manipulation.</p> <p>23 Q What are classifiers of inorganic</p> <p>24 manipulation?</p> <p>25 A It could be anything like temporal</p>
<p style="text-align: right;">Page 91</p> <p>1 you here?</p> <p>2 (Exhibit 3 marked for identification.)</p> <p>3 MS. ADAMS-JACK: I'm back. I can handle</p> <p>4 it.</p> <p>5 MS. GOVERNSKI: Okay. You know the one</p> <p>6 I'm asking for?</p> <p>7 MS. ADAMS-JACK: Yes. Yes, got it.</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q As my colleague is putting up Meta's</p> <p>10 policy, are you familiar with a term called</p> <p>11 "inauthentic behavior"?</p> <p>12 A Yes.</p> <p>13 Q What does inauthentic behavior mean?</p> <p>14 A It is activity that is not based on the</p> <p>15 usual way that users interact with content across</p> <p>16 Meta's platforms.</p> <p>17 Q What are the usual ways that users</p> <p>18 interact with content on Meta?</p> <p>19 A The usual ways would be taking a baseline</p> <p>20 based on data that we have internally.</p> <p>21 Q What does that mean?</p> <p>22 MR. FRITZ: Objection. You can answer.</p> <p>23 THE WITNESS: So within Meta, we have</p> <p>24 baselines that we can see how users have</p> <p>25 historically interacted with our content. Based on</p>	<p style="text-align: right;">Page 93</p> <p>1 oddities. It could be user activity that would be</p> <p>2 outside of a normal timeframe. It would be things</p> <p>3 like amplification ratios. Looking at those kind of</p> <p>4 fingerprints.</p> <p>5 Q Let's go down in Exhibit 3 to the first</p> <p>6 paragraph on the next page. Oh, sorry. Let me</p> <p>7 share.</p> <p>8 MS. GOVERNSKI: Autumn, can you share</p> <p>9 your screen on this so we're all looking at the same</p> <p>10 thing?</p> <p>11 MS. ADAMS-JACK: I think you have to stop</p> <p>12 sharing and then I can switch.</p> <p>13 MR. FRITZ: Nicole, I would just download</p> <p>14 the document so you can look at it as you see fit.</p> <p>15 MS. GOVERNSKI: Well, I won't share it if</p> <p>16 that's not helpful. I was doing it more as a</p> <p>17 helpful.</p> <p>18 THE WITNESS: It's easier for me to look</p> <p>19 at it on my screen.</p> <p>20 MS. GOVERNSKI: Okay. So if you look at</p> <p>21 the second page, it says --</p> <p>22 MR. FRITZ: Just take a -- excuse me,</p> <p>23 sorry. Take a moment to look at the entire document</p> <p>24 and then let Meryl know when you're ready.</p> <p>25 MS. GOVERNSKI: I'm not going to ask</p>

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<p style="text-align: right;">Page 94</p> <p>1 about the entire document, though. 2 MR. FRITZ: I understand. 3 THE WITNESS: Okay. 4 BY MS. GOVERNSKI: 5 Q Okay. If you can look at the first 6 paragraph, and it says: 7 (As read): 8 "In line with our commitment to 9 authenticity, we don't allow people to 10 misrepresent themselves on our service, 11 use fake accounts, artificially boost 12 the popularity of content or engage in 13 behaviors designed to enable other 14 violations under our community 15 standards." 16 Do you see that? 17 A Yes. 18 Q Did you engage in any of these type of 19 behaviors while you were at Meta? 20 MR. FRITZ: Objection. 21 THE WITNESS: I'm sorry? Could you 22 repeat that? 23 BY MS. GOVERNSKI: 24 Q When you were -- 25 MR. FRITZ: Note my objection.</p>	<p style="text-align: right;">Page 96</p> <p>1 Q And coordinated activities could be 2 manual, right, not automated? 3 A They can be, yes. It would have to be 4 very, very synchronized for it to work at scale, but 5 yes, it is possible. 6 Q When you say "to work at scale," what do 7 you mean? 8 A To -- to make a difference. So you, as 9 an individual, clicking on things across the site is 10 not going to make an impact when it comes to 11 traffic. 12 Q But -- but it's possible that you could 13 synchronate in order to artificially boost without 14 using automated tools, right? 15 MR. FRITZ: Objection. 16 You can answer. 17 THE WITNESS: So as I stated before, it's 18 possible, but it's extremely difficult to do so. 19 BY MS. GOVERNSKI: 20 Q Right. You would have to be an expert in 21 order to do that? 22 MR. FRITZ: Objection. 23 THE WITNESS: I wouldn't say that. 24 That's -- I'm not sure what that means particularly. 25 But you would need to have a vast network of humans</p>
<p style="text-align: right;">Page 95</p> <p>1 BY MS. GOVERNSKI: 2 Q When you were doing marketing at Meta, 3 did you engage in any of these type of behaviors? 4 A Let me just read this again. So I -- so 5 I want to clarify first. So you have me looking at 6 a document from Meta that is about user standards. 7 So this is community-based standards on what 8 consumers or users that sign up on Meta's platforms 9 agree to. 10 So to answer your question, as a user at 11 Meta, someone with a Facebook account, someone with 12 an Instagram account, I did not do any of these 13 activities while at Meta as a user. 14 Q And why not? 15 MR. FRITZ: Objection. 16 THE WITNESS: I don't know how to answer 17 that. 18 BY MS. GOVERNSKI: 19 Q What is your understanding of 20 "artificially boost"? What does that mean? 21 A So in this context for Meta, as part of 22 their user agreement, it would mean using things 23 like different programs or bots or coordinated 24 activities to increase traffic in some way, shape, 25 or form.</p>	<p style="text-align: right;">Page 97</p> <p>1 in order to pull that off. 2 BY MS. GOVERNSKI: 3 Q Okay. And would, under the way that you 4 use the term "organic" in your report, would that 5 type of artificial boosting that uses a manual 6 network be considered organic or not organic? 7 A That would be considered inorganic, the 8 way that I'm using it. 9 Q Okay. And if we look at the next 10 sentence, it says: 11 (As read): 12 "Inauthentic behavior refers to a 13 variety of complex forms of deception 14 performed by a network of inauthentic 15 assets controlled by the same 16 individual or individuals with the goal 17 of deceiving Meta or a community." 18 Do you see that? 19 A Sorry, what page are you on for that one? 20 Q The same paragraph. 21 A Oh. 22 Q Just the next sentence. 23 A Oh, yes, sorry. 24 Q And do you agree with that sentence? 25 A I don't disagree with it. It's -- it's</p>

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<p style="text-align: right;">Page 98</p> <p>1 Meta's terms. I'm not sure...</p> <p>2 Q But do you agree that inauthentic</p> <p>3 behavior includes complex forms of deception</p> <p>4 performed by a network of inauthentic assets</p> <p>5 controlled by the same individuals -- individual or</p> <p>6 individuals?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 You can answer again.</p> <p>9 THE WITNESS: I would say yes, that's</p> <p>10 accurate.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q What does that mean to you when it says</p> <p>13 "a network of inauthentic assets controlled by the</p> <p>14 same individual or individuals"?</p> <p>15 A The way that I would -- okay. Do you</p> <p>16 want me to put my Meta hat on, or do you want me to</p> <p>17 speak from the perspective of an expert outside of</p> <p>18 Meta? Because there's two different answers.</p> <p>19 Q Give me both.</p> <p>20 A So within Meta, that means if you own a</p> <p>21 link farm, if you are coordinating with bots,</p> <p>22 particularly around -- to deceive around advertising</p> <p>23 or politics, those are usually the two forms.</p> <p>24 Outside of Meta, I would say it's more</p> <p>25 about am I orchestrating something that I have</p>	<p style="text-align: right;">Page 100</p> <p>1 would say inauthentic assets would mean any asset</p> <p>2 that is attempting to either negatively or</p> <p>3 positively impact something, defraud or cause harm</p> <p>4 or specific benefit.</p> <p>5 BY MS. GOVERNSKI:</p> <p>6 Q And that could be automated or it could</p> <p>7 be manual, right?</p> <p>8 A As I said before, it's normally</p> <p>9 automated. And in rare cases, with a lot of</p> <p>10 coordination at scale, it could also be manual.</p> <p>11 Q What is your basis for saying that it's</p> <p>12 ordinarily automated?</p> <p>13 A So, again, in the context of social</p> <p>14 media, for it to be impactful, make a dent at scale,</p> <p>15 it is extremely difficult to do that in a</p> <p>16 coordinated way with a network of humans.</p> <p>17 Q How could you do it?</p> <p>18 MR. FRITZ: Objection.</p> <p>19 THE WITNESS: I mean, there is probably</p> <p>20 several different ways. The one way I could think</p> <p>21 of would be to rally a massive amount of, again,</p> <p>22 individuals, human beings in a coordinated attempt</p> <p>23 that would either cause benefit or cause harm. But</p> <p>24 there would have to be -- it would have to have</p> <p>25 signatures -- I'm trying to think how -- it would</p>
<p style="text-align: right;">Page 99</p> <p>1 access to a myriad of different -- most likely,</p> <p>2 computers and algorithmic programs. Because, again,</p> <p>3 as I mentioned, human beings is extremely difficult</p> <p>4 to coordinate that. And am I trying to do it in</p> <p>5 order to impact something in either a negative or</p> <p>6 positive way.</p> <p>7 Q And when it says "a network of</p> <p>8 inauthentic assets," what is your understanding of</p> <p>9 "inauthentic assets"?</p> <p>10 A So the way that Meta is looking at</p> <p>11 this --</p> <p>12 Q I'm asking how you are looking at it.</p> <p>13 Sorry.</p> <p>14 MR. FRITZ: Sorry.</p> <p>15 Objection.</p> <p>16 MS. GOVERNSKI: I wanted to clarify my</p> <p>17 question.</p> <p>18 MR. FRITZ: Why doesn't -- do you want to</p> <p>19 withdraw it? Are you withdrawing the first one or</p> <p>20 you're going to ask another one?</p> <p>21 MS. GOVERNSKI: I specifically asked, how</p> <p>22 do you define the term "inauthentic assets"?</p> <p>23 MR. FRITZ: Okay.</p> <p>24 Go ahead, Nicole.</p> <p>25 THE WITNESS: Outside of this context, I</p>	<p style="text-align: right;">Page 101</p> <p>1 have to have signatures of authenticity, though, for</p> <p>2 it not to be identifiable.</p> <p>3 Q What does that mean, "signatures of</p> <p>4 authenticity"?</p> <p>5 A I'm sorry. I should flip that. I should</p> <p>6 have said signatures of inauthenticity. Apologies.</p> <p>7 Q Can you explain what you mean by</p> <p>8 "signatures of inauthenticity"?</p> <p>9 A Signatures of inauthenticity?</p> <p>10 Q Uh-huh.</p> <p>11 A So as I mentioned before, things like,</p> <p>12 you know, like temporal analysis, content,</p> <p>13 homogeneous content. It would be things like</p> <p>14 coordination clusters. But, again, that would all</p> <p>15 be based on actually doing the analysis to figure</p> <p>16 out if that -- if that was there.</p> <p>17 Q So if someone was really good at doing</p> <p>18 this, couldn't it avoid those signs of</p> <p>19 inauthenticity?</p> <p>20 MR. FRITZ: Objection.</p> <p>21 You can answer.</p> <p>22 THE WITNESS: Sorry. There's -- I'm not</p> <p>23 going to say always, but there is usually</p> <p>24 identifiers, which is why you don't just look at one</p> <p>25 element of inauthenticity. You look at several</p>

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<p style="text-align: right;">Page 102</p> <p>1 different ones. So, for instance, you know, posting 2 times, that would just be one. So if someone got 3 around posting times, there is still six or seven 4 other fingerprinting techniques that you can use. 5 So you don't just check one factor; you check a 6 myriad of different factors. 7 BY MS. GOVERNSKI: 8 Q But if someone understood what all those 9 factors are, couldn't they devise a campaign at 10 scale to avoid those signs of inauthenticity? 11 MR. FRITZ: Objection. 12 THE WITNESS: I have not seen that to 13 actually be possible, where it's -- that it's not 14 identifiable in any of the different ways that you 15 would analyze it. 16 BY MS. GOVERNSKI: 17 Q Isn't it possible that you just wouldn't 18 be able to identify it because it was untraceable? 19 MR. FRITZ: Objection. 20 THE WITNESS: So untraceable sounds good 21 from a marketing perspective. Untraceable is still 22 traceable. So there are usually signatures that 23 fall outside of what the norm would look like or 24 outside of a baseline. And that would, then, get 25 you to dig deeper into understanding why that</p>	<p style="text-align: right;">Page 104</p> <p>1 behavior. 2 A Oh -- 3 MR. FRITZ: Objection. 4 Go ahead. 5 THE WITNESS: -- so that actually is one. 6 That is one that we saw specifically in my work at 7 Meta. So that's one that I'm -- one example. We've 8 also seen actual use case at Meta. We've seen 9 issues where there were like temporal -- where 10 coordination across different regions. So they were 11 outside of, like, normal posting times, based on the 12 baseline of when users authentically post, 13 re-tweet -- sorry, for -- repost in this case. 14 I've also seen specifically in previous 15 work with Ipsos, through Synthesio, which is a 16 social media tool that we had. We've seen things 17 like coordinated signatures around, like, age 18 activity. So where accounts were, like, newly 19 created and they were all the ones -- they were the 20 ones that were posting problematic content. 21 BY MS. GOVERNSKI: 22 Q But I'm trying to understand a specific 23 incident. Like not just talking generally, but what 24 was the specific content that you saw to be 25 inauthentic? You gave two examples at Meta. What</p>
<p style="text-align: right;">Page 103</p> <p>1 happened, if it was authentically an anomaly or if 2 it was a coordinated act. 3 BY MS. GOVERNSKI: 4 Q So you say "usually," but that doesn't 5 mean that there is always signatures, right? 6 MR. FRITZ: Objection. 7 You can answer again. 8 THE WITNESS: In all of the ways that I 9 have seen and been privy to, there are usually -- 10 there have been ways of determining inauthentic 11 behavior. 12 BY MS. GOVERNSKI: 13 Q How have you seen that? Can you explain? 14 A Sure. So I've seen it based on -- again, 15 going back to, like, content, homogeneous content. 16 So things where you have -- this is just one 17 example -- things where you have identical verbiage, 18 like literally identical, or even things around 19 social media as consistent as the flow of hashtags. 20 So the -- you know, how hashtags actually show up. 21 And I'm seeing that from an original piece of 22 content dropping, not a re-tweet, not a repost. 23 Q But I'm trying to ask, like, specific 24 case studies that you have performed or been 25 involved in where you have seen inauthentic</p>	<p style="text-align: right;">Page 105</p> <p>1 were the specific content that you determined that 2 was inauthentic? 3 MR. FRITZ: Objection. 4 You can answer again. 5 THE WITNESS: So at Meta, in one specific 6 case, it was seeing duplicative identical content 7 showing up at a higher propensity than normal. 8 BY MS. GOVERNSKI: 9 Q What was the specific content? 10 A So I cannot tell you the specific content 11 for anything I did within Meta. Are you asking -- 12 Q You can designate it as confidential, but 13 I'm entitled to understand the basis of your 14 knowledge. 15 What was the specific type of content 16 that, in that case, you determined was inauthentic? 17 MR. FRITZ: Well, if there is some 18 contract that she's bound by or regulations that 19 said this is proprietary information, then I'm not 20 sure the protective order would cover that. 21 THE WITNESS: I can tell you that it was 22 political. 23 BY MS. GOVERNSKI: 24 Q And what was your role in sussing out 25 that content?</p>

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<p style="text-align: right;">Page 106</p> <p>1 A So my role was to look at the vast amount 2 of data over a certain period of time in order to 3 look at anomalies that this content was being -- 4 that this content was inflated or the activity 5 around the content was inflated. 6 Q How was it inflated? 7 A Trying to think of how I can -- how I can 8 share. There were actors that were pushing this 9 content across Meta's platforms, and we saw bot 10 behavior in that circumstance, or in that particular 11 use case. 12 Q And so that case included bot behavior. 13 Did the other specific Meta case that you were 14 referring to include bot behavior? 15 A The other one did. It was different bot 16 behavior. So -- I mean, because bot is a very 17 general term, just to be specific, right? 18 Programmatic advertising is bots. So this was 19 manipulative bot behavior in the political case that 20 was foreign actors. 21 The second case was bot activity specific 22 to inflating advertising numbers in order to harm a 23 business. 24 Q And have you ever identified, in any of 25 your positions, any campaigns that did not include</p>	<p style="text-align: right;">Page 108</p> <p>1 what they thought were inauthentic customers. 2 Q And if someone wanted to appear to be an 3 authentic customer, that would be possible, wouldn't 4 it? 5 MR. FRITZ: Objection. 6 THE WITNESS: In this case, it would not 7 have been. 8 BY MS. GOVERNSKI: 9 Q What about in any case? 10 MR. FRITZ: Objection. 11 THE WITNESS: That's a lot of different 12 assumptions I would have to make. I couldn't answer 13 that. 14 BY MS. GOVERNSKI: 15 Q Well, what would it take for someone to 16 make a coordinated campaign look authentic? 17 MR. FRITZ: Objection. 18 THE WITNESS: I don't know all the 19 factors to be able to answer that. 20 MR. FRITZ: We've been going for about 21 two hours. Why don't we take a break now? 22 MS. GOVERNSKI: When I'm done with this 23 line of questioning. 24 MR. FRITZ: Well, no, actually, we're 25 going to --</p>
<p style="text-align: right;">Page 107</p> <p>1 bot behavior? 2 A Yes. 3 Q Tell me about those. 4 MR. FRITZ: Objection. 5 THE WITNESS: We've had -- so some were 6 with Ipsos. We were looking through Synthesio, 7 which was our social media solution, for when a CPG 8 company felt that sales and the subsequent return 9 of -- yeah, return -- return of goods was around bot 10 activity. We saw that that was not the case. So we 11 were able to identify that it had the signatures of 12 authentic activity where people were just 13 purchasing, were unhappy, and were returning goods. 14 BY MS. GOVERNSKI: 15 Q And how did you rule out that it was this 16 type of manual network that did not rely on bots? 17 A So we looked at sort of -- in that case, 18 we looked at tracking. So we looked at where the 19 purchases were taking place, where the order was 20 taking place, where the purchases were sent to. And 21 we looked to see if there were any signifiers that 22 skewed outside of what their normal base of 23 customers looked like. So we were able to see that 24 their authentic customers, which they agreed with 25 were authentic customers, had the same signatures as</p>	<p style="text-align: right;">Page 109</p> <p>1 MS. GOVERNSKI: When I'm done with this 2 question -- I was in the middle of a question. 3 MR. FRITZ: You weren't in the middle of 4 a question. 5 MS. GOVERNSKI: I was. 6 MR. FRITZ: You weren't. 7 MS. GOVERNSKI: The court reporter -- can 8 you read -- 9 (Cross talk.) 10 MR. FRITZ: -- we've been going for two 11 hours and now you're trying to pose a question. 12 MS. GOVERNSKI: I will take a break after 13 this. 14 So the court reporter, can you read back 15 the question? 16 (Cross talk.) 17 MR. FRITZ: We're going to -- 18 MS. GOVERNSKI: Kevin, there's a question 19 pending. 20 (Cross talk.) 21 MR. FRITZ: There wasn't. 22 (Cross talk.) 23 MS. GOVERNSKI: Let's ask the court 24 reporter. 25 MR. FRITZ: Frankly, with all due respect</p>

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<p style="text-align: right;">Page 110</p> <p>1 to the court reporter, I don't care what this court 2 reporter said. I suggest that we take a break and 3 then you start to ask another question. 4 MS. GOVERNSKI: That's not true. 5 MR. FRITZ: I've never seen anyone do 6 that before. 7 MS. GOVERNSKI: Ash -- there's a question 8 pending. If she says no -- 9 (Cross talk.) 10 MR. FRITZ: Nicole, we're going to come 11 back at 11:25. You can put yourself -- 12 (Cross talk.) 13 MS. GOVERNSKI: Kevin, if the court 14 reporter says there is a question pending, I will -- 15 we should believe her. If not, then I'll step -- 16 Ash, please speak. 17 (Cross talk.) 18 MS. GOVERNSKI: Please respect Ash. 19 MR. FRITZ: I know the sequence. I know 20 the sequence. 21 MS. GOVERNSKI: Ash, what was the 22 sequence? 23 MR. FRITZ: With all due respect to the 24 court reporter, it doesn't matter. 25 (Cross talk.)</p>	<p style="text-align: right;">Page 112</p> <p>1 MR. FRITZ: So the record should reflect 2 there was no question pending. 3 MS. GOVERNSKI: Well, I asked a question, 4 but the record was not -- 5 (Cross talk.) 6 MR. FRITZ: See you in ten minutes. 7 THE VIDEOGRAPHER: We are off the record. 8 It's 1:16 p.m. 9 (Recess.) 10 THE VIDEOGRAPHER: We're back on the 11 record. It is 1:26 p.m. 12 BY MS. GOVERNSKI: 13 Q Ms. Alexander, we moved into Exhibit 14 Share -- actually, I should ask, Ms. Alexander, did 15 you have any substantive conversations with your 16 counsel during the break? 17 A No. 18 MS. GOVERNSKI: We've moved into Exhibit 19 Share what will be marked as Exhibit 4. Can you 20 look at that? 21 (Exhibit 4 marked for identification.) 22 BY MS. GOVERNSKI: 23 Q Can you look at that? 24 A Yes, I have it. 25 Q What is it?</p>
<p style="text-align: right;">Page 111</p> <p>1 MS. GOVERNSKI: Ash -- 2 (Cross talk.) 3 MR. FRITZ: You started asked the 4 question, which you didn't finish, after I asked for 5 a break. It's inappropriate. So we're going to 6 take a break now. We'll come back at 1:25. 7 MS. GOVERNSKI: Kevin, I'm allowed to 8 ask -- 9 (Cross talk.) 10 MR. FRITZ: Nicole -- 11 MS. GOVERNSKI: Stop talking, Kevin. 12 Ash, please, was a question pending? 13 THE STENOGRAPHIC REPORTER: I would have 14 to check. 15 MS. GOVERNSKI: Please check. 16 THE STENOGRAPHIC REPORTER: Here it is. 17 (The record read.) 18 MS. GOVERNSKI: Okay. Let's go on break. 19 Ten minutes? 20 She answered that question. Right, Ash? 21 THE STENOGRAPHIC REPORTER: I don't know. 22 I'll have to look at the -- 23 MR. FRITZ: What happened after that? 24 What happened after that? 25 (Cross talk.)</p>	<p style="text-align: right;">Page 113</p> <p>1 A My book cover. 2 MS. GOVERNSKI: Okay. I'm going to admit 3 as Exhibit 4 your book. We're going to send to 4 Veritext a copy of your actual physical book. And 5 then for purposes of the exhibit -- of the 6 discussion today, I have an excerpt from your book, 7 which I will mark as Exhibit 4A, which should also 8 be in your Exhibit Share. 9 (Exhibit 4-A marked for identification.) 10 BY MS. GOVERNSKI: 11 Q If you can pull that up. 12 A Just a sec. I'm downloading it. 13 Q Sure. 14 A 4A. Got it. 15 MR. FRITZ: Are you going to send me a 16 copy of the book too, Meryl? 17 MS. GOVERNSKI: Sure. 18 MR. FRITZ: Thanks. 19 BY MS. GOVERNSKI: 20 Q Ms. Alexander, do you see the excerpt 21 that is marked as Exhibit 4A is page 15 of your 22 book? 23 A Yes. 24 Q Okay. And you write: 25 (As read):</p>

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<p style="text-align: right;">Page 114</p> <p>1 "AI-driven content curation on social 2 media platforms influences not just 3 purchasing decisions but also opinions 4 and beliefs. Algorithms prioritize 5 content that is likely to engage users, 6 often amplifying sensational or 7 polarizing material." 8 When you use the terms "sensational or 9 polarizing material," what did you mean? 10 A I can't think in my mindset at that 11 particular time, but I think I was probably 12 referencing things like specifically, you know, 13 coordinated attempts around politics, around -- I'm 14 not sure. Just major -- major events where we've 15 seen harm come to companies, governments, 16 individuals, based on coordinated attacks. 17 Q Okay. And when it says: 18 (As read): 19 "This can skew perceptions and 20 contribute to the spread of 21 misinformation, as seen in various 22 instances where fake news has gone 23 viral." 24 Do you see that? 25 A Yes.</p>	<p style="text-align: right;">Page 116</p> <p>1 escalation of it to get to sensationalism is usually 2 coordinated. 3 Q I see. So something can be both 4 inorganic and organic? 5 MR. FRITZ: Objection. 6 THE WITNESS: So I would tease those two 7 out. Something can start off as organic and it can 8 be manipulated into being inorganic. 9 BY MS. GOVERNSKI: 10 Q What about vice versa? Can start off 11 inorganic and be manipulated to seem organic? 12 A That's more difficult to do. It's not 13 impossible, but it's extremely difficult to do. 14 Q How would you do it? 15 MR. FRITZ: Objection. 16 THE WITNESS: I mean, that -- I'm not 17 quite sure of the ways you would go about escalating 18 it. I'm sure there's a myriad of different ways. 19 BY MS. GOVERNSKI: 20 Q But as you sit here today, you don't know 21 any ways that would be used to do that, other than 22 that that it's possible? 23 A To go from something that is inorganic to 24 make it -- I'm sorry. 25 Q Appear organic.</p>
<p style="text-align: right;">Page 115</p> <p>1 Q What did you mean by the term 2 "misinformation"? 3 A So misinformation, specifically I was 4 talking about where information is presented as 5 either slightly skewed versus what the original 6 information actually is or completely false. 7 Q Uh-huh. And how has -- 8 A I'm so sorry to cut you off. I should 9 have added "for deceptive purposes," was the last. 10 Q Okay. And how -- how is the spread of 11 misinformation related to fake news going viral? 12 A So a couple of different ways. So this 13 information is usually meant to feed on emotions. 14 And when you have emotions either to the left or the 15 right, extremely happy or extremely negative, those 16 are the times when human beings usually promote 17 content more so from a human perspective. 18 From an algorithmic perspective, we've 19 seen studies that have shown that misinformation 20 also has been able to radicalize individuals and 21 algorithms show more and more intense information 22 depending on how users engage with that content. 23 Q So the engagement that you've just 24 described, that would be organic engagement, right? 25 A Misinformation is organic, yes. The</p>	<p style="text-align: right;">Page 117</p> <p>1 A No. Because you would need -- you would 2 need -- no. I can't think of anything. I can't 3 think of how you would go about that. 4 Q Let's just do in your hypothetical. You 5 said that if something is sensational or polarizing, 6 it can motivate people to on their own post, right? 7 A Correct. 8 Q What if the sensational or polarizing 9 material is something that is planted and not 10 truthful? Couldn't that have the exact same effect 11 you just described? 12 A For it to be sensationalized, yes. 13 Q For then users to pick it up and 14 organically spread it? 15 A Yes, that is possible. 16 Q Let's go back to the excerpt on page 22. 17 It says: 18 (As read): 19 "Reputational harm can be even more 20 devastating than legal penalties. In 21 today's digital landscape, news, 22 especially bad news, travels fast. A 23 single incident can tarnish a brand's 24 impact overnight and rebuilding trust 25 can take years."</p>

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<p style="text-align: right;">Page 118</p> <p>1 Do you see that?</p> <p>2 A I do.</p> <p>3 Q Do you stand behind that sentence?</p> <p>4 MR. FRITZ: Sorry. You said page 22,</p> <p>5 Meryl? I thought we were looking at page 15.</p> <p>6 MS. GOVERNSKI: Oh, I'm sorry. Let's go</p> <p>7 to page 22.</p> <p>8 MR. FRITZ: Is this a new exhibit?</p> <p>9 MS. GOVERNSKI: Well, I did say 22.</p> <p>10 Amber, is this the same exhibit? Autumn. Sorry.</p> <p>11 Oh, let's go to 4B.</p> <p>12 (Exhibit 4-B marked for identification.)</p> <p>13 THE STENOGRAPHIC REPORTER: Meryl, we're</p> <p>14 going to 4B. We need to announce it. Thank you.</p> <p>15 MS. GOVERNSKI: Yup, 4B. While my</p> <p>16 colleague is getting it pulled out.</p> <p>17 BY MS. GOVERNSKI:</p> <p>18 Q Do you recall writing that reputational</p> <p>19 harm can be even more devastating than legal</p> <p>20 penalties and that a single incident can tarnish a</p> <p>21 brand's impact overnight and rebuilding trust can</p> <p>22 take years?</p> <p>23 A Yes. I know that statement. I remember</p> <p>24 writing that.</p> <p>25 Q Do you agree with that statement?</p>	<p style="text-align: right;">Page 120</p> <p>1 also have to mitigate their own risk as well.</p> <p>2 Q Okay. So other than the book, your CV</p> <p>3 doesn't list any other publications that you've</p> <p>4 authored. Have you authored any other publications?</p> <p>5 A Do you mean like academic papers, I'm</p> <p>6 assuming you mean?</p> <p>7 Q Anything.</p> <p>8 MR. FRITZ: Objection.</p> <p>9 THE WITNESS: I've authored other papers,</p> <p>10 yes.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q What papers?</p> <p>13 A I've authored papers at all of my</p> <p>14 companies. So at Meta --</p> <p>15 Q Okay --</p> <p>16 MR. FRITZ: Objection.</p> <p>17 THE WITNESS: Ipsos, Nielsen --</p> <p>18 MR. FRITZ: Go ahead and finish your</p> <p>19 answer, Ms. Alexander.</p> <p>20 THE WITNESS: That was it.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q Have you -- have any of your other</p> <p>23 publications that you've authored been published?</p> <p>24 A No.</p> <p>25 Q So the book is the only piece of</p>
<p style="text-align: right;">Page 119</p> <p>1 A Yes.</p> <p>2 Q Okay. And you continued:</p> <p>3 (As read):</p> <p>4 "Recovering from reputational damage</p> <p>5 requires substantial investment in</p> <p>6 public relations, marketing, and</p> <p>7 operational changes."</p> <p>8 Do you recall writing that as well?</p> <p>9 A I do.</p> <p>10 Q Do you agree with that statement?</p> <p>11 A I do.</p> <p>12 Q By the way, you talk about brands. When</p> <p>13 you talk about brands in your book, is that</p> <p>14 corporate brands?</p> <p>15 A That's any brands. It can be small,</p> <p>16 medium business. It can be enterprise. Obviously,</p> <p>17 in regards to the statement that you just mentioned,</p> <p>18 obviously the amount of investment is vastly</p> <p>19 different for an enterprise brand versus a small and</p> <p>20 medium business brand.</p> <p>21 Q Right. But the principle is the same?</p> <p>22 A There is always -- yes, there is elements</p> <p>23 of recovery. But brands are also -- and I think</p> <p>24 it's a subsequent statement on either the previous</p> <p>25 or the following page. I also talk about how brands</p>	<p style="text-align: right;">Page 121</p> <p>1 literature that you've published?</p> <p>2 A Correct.</p> <p>3 Q What sort of journals exist in your</p> <p>4 discipline?</p> <p>5 A Sorry, in marketing?</p> <p>6 Q How would you define your discipline?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: I'm sorry, I'm not sure how</p> <p>9 to answer that.</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q How would you define your expertise?</p> <p>12 A We've just got done talking about Meta.</p> <p>13 If you're asking in my discipline at Meta, I was in</p> <p>14 marketing. Full-staff marketing. So that's</p> <p>15 everything from data analysis to engineering to -- I</p> <p>16 mean, PR, branding, et cetera.</p> <p>17 Q Well, what is your understanding of why</p> <p>18 you're being offered as an expert in this case?</p> <p>19 A So as an expert in this case, it's for my</p> <p>20 experience in data analysis, marketing, and</p> <p>21 specifically social networks.</p> <p>22 Q So in data analysis, marketing, or what</p> <p>23 was the last thing you said? Social?</p> <p>24 A Social networks.</p> <p>25 Q Social networks. In your experience in</p>

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<p style="text-align: right;">Page 122</p> <p>1 either of those, are there journals that exist in 2 any of those three disciplines? 3 A There are several. You want me to just 4 name them? 5 Q That would be great. 6 A Journal of Marketing, God, they all have 7 long names. Nature Human Behavior and something. I 8 don't actually subscribe to the journals so... 9 Q Any -- 10 A I don't have to. We get them free as 11 faculty. 12 Q Which ones do you receive as a member of 13 the faculty? 14 A I read -- because receiving and reading 15 are different. I read American Marketing 16 Association and their journal. I read ANA's 17 Journal. I'm sorry. Stands for American National 18 Advertisers, I think the acronym is. 19 Q Okay. 20 A Those are the ones I usually read. 21 Q So American Marketing Association and the 22 American National Association's Journal; is that 23 right? 24 A Of Advertisers. 25 Q American National Association of</p>	<p style="text-align: right;">Page 124</p> <p>1 obligation of having to publish. Whereas, academics 2 usually do. 3 Q You mentioned that you wrote a number of 4 papers for Meta in the course of your career. Have 5 any of the papers you've written been peer-reviewed? 6 A None that -- well, actually, no, that's 7 not true. Yes. A paper that I wrote in conjunction 8 with another author at Ipsos was peer-reviewed and 9 we presented that at an academic -- jointly at an 10 academic forum. And that was peer-reviewed. I 11 think that's it. A peer review process like in 12 academia is a little bit different than 13 peer-reviewed for a practitioner. 14 Q When you were referring to peer-reviewed 15 in this context, was it for a practitioner or was it 16 academic? 17 A That was academia. 18 Q Okay. And what was the topic of that 19 paper? 20 A We looked at -- we looked at marketing 21 effectiveness and behavior across -- across a global 22 dataset. 23 Q And why did you not list that paper in 24 your CV? 25 A Because it wasn't published.</p>
<p style="text-align: right;">Page 123</p> <p>1 Advertisers? 2 A Yes. 3 Q Any other journals that you read on a 4 regular basis? 5 A Journals themselves, no. I usually read 6 individual articles when they interest me. 7 Q How do you decide what articles to read? 8 A Depending on topic. It could be 9 something that is shared with me, something that is 10 in my queue based on different tags or hashtags. 11 Q But it's just like an ad hoc basis what 12 you decide to read? 13 MR. FRITZ: Objection. 14 THE WITNESS: Yes. 15 BY MS. GOVERNSKI: 16 Q Have you ever edited any of the journals 17 that you just discussed? 18 A I'm not an editor for any journal. No. 19 Q But none of the work that you've done has 20 been published in any of the specific journals that 21 you've just discussed? 22 A No. That's usually for more full-blown 23 academics. 24 Q Can you explain that distinction? 25 A As a practitioner, I don't have the</p>	<p style="text-align: right;">Page 125</p> <p>1 Q Do you have a copy of it? 2 A Honestly, I don't know. I may have a 3 copy of it somewhere. 4 Q What was the methodology that was tested 5 in that paper? 6 A So we looked at marketing effectiveness. 7 So we looked at regression analysis of a myriad of 8 different campaigns across different disciplines. 9 In order to talk about things like concepts, how 10 concepts actually worked well if they went live, if 11 they didn't go live. We appended sales data to 12 that, for the ones that did go live, obviously. And 13 just looking at the overall trend of how to bring a 14 product concept to fruition. 15 Q Did you rely on that analysis for 16 purposes of this report? 17 A No. 18 Q Let's go -- if you can pull up your 19 report, please. Let's do the latest one, 20 Exhibit 002. Let's go to Appendix C. What is your 21 understanding of what Appendix C is? 22 A Those are materials I considered when 23 drafting my report. 24 Q Did you draft Appendix C? 25 A Yes.</p>

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<p style="text-align: right;">Page 126</p> <p>1 Q Did you consider any materials that are</p> <p>2 not listed in Appendix C?</p> <p>3 A For the end report, no.</p> <p>4 Q What does that mean, "for the end</p> <p>5 report"?</p> <p>6 A For the report that you're looking at,</p> <p>7 no.</p> <p>8 Q But did you consider any other materials</p> <p>9 for -- in the course of preparing your report?</p> <p>10 A In the course of preparing it, no.</p> <p>11 Q So Appendix C lists everything you</p> <p>12 considered in the course of preparing your report?</p> <p>13 MR. FRITZ: Objection. You can answer</p> <p>14 again.</p> <p>15 THE WITNESS: Just doing a read-through.</p> <p>16 Yes.</p> <p>17 MS. GOVERNSKI: Okay. Autumn, go ahead</p> <p>18 and let's share this on the screen so at least I can</p> <p>19 look at it on the screen, please.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q What quality control steps did you ensure</p> <p>22 that Appendix C contained all of your sources?</p> <p>23 A I used Zotero, which is a software for</p> <p>24 citation and reference clipping and storing.</p> <p>25</p>	<p style="text-align: right;">Page 128</p> <p>1 you used -- that you relied on for purposes of your</p> <p>2 report?</p> <p>3 A Yes, I believe so.</p> <p>4 Q Okay. And if you look at page 109, there</p> <p>5 is a report by -- you cite an article by Bellutta,</p> <p>6 right?</p> <p>7 A Yes.</p> <p>8 Q Okay. You see there's an article by</p> <p>9 Bellutta, right?</p> <p>10 MR. FRITZ: Are you looking at page 108,</p> <p>11 Meryl?</p> <p>12 MS. GOVERNSKI: Nope. I'm looking at --</p> <p>13 oh, you know what, it might be the new report.</p> <p>14 Sorry. I'm working off the old report. Yup.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q 108, you see Bellutta?</p> <p>17 A I do.</p> <p>18 Q And it's called "Investigating</p> <p>19 coordinated account creation using burst detection</p> <p>20 and network analysis."</p> <p>21 Do you see that?</p> <p>22 A Yes.</p> <p>23 Q Okay. That's in the article -- it's in</p> <p>24 The Journal of Big Data. That wasn't one of the</p> <p>25 journals that you read regularly?</p>
<p style="text-align: right;">Page 127</p> <p>1 Q Okay. Is Terow -- does it include an AI</p> <p>2 feature?</p> <p>3 A It's Zotero. And I do not believe it</p> <p>4 does. It's Z-O-T-E-R-O.</p> <p>5 Q I appreciate that. Thank you.</p> <p>6 And where you include citations in your</p> <p>7 report -- strike that.</p> <p>8 You include certain footnotes with</p> <p>9 citations in your report, but a lot of paragraphs</p> <p>10 have no citations. What is -- how are we supposed</p> <p>11 to know the basis for the paragraphs where you don't</p> <p>12 include a citation?</p> <p>13 MR. FRITZ: Objection. You can answer.</p> <p>14 THE WITNESS: If I'm not using a</p> <p>15 citation, then it comes from personal knowledge.</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q Rather than academia?</p> <p>18 A Rather than having to reference -- me</p> <p>19 going to reference something.</p> <p>20 Q Understood. Let's look at 108.</p> <p>21 A Okay.</p> <p>22 Q Okay. You see it lists academic</p> <p>23 materials?</p> <p>24 A Yes.</p> <p>25 Q Are these all the academic papers that</p>	<p style="text-align: right;">Page 129</p> <p>1 A It's not one of the ones I listed</p> <p>2 earlier, no.</p> <p>3 Q Is it one of the ones you read regularly?</p> <p>4 A No.</p> <p>5 Q Let's go to your report, paragraph 20.</p> <p>6 A Okay.</p> <p>7 Q Let me just make sure it's still 20. You</p> <p>8 see that there is a footnote there at the end of</p> <p>9 paragraph 20, to footnote 2?</p> <p>10 A Yes.</p> <p>11 Q You see that it's unlike the other title,</p> <p>12 which was "Investigating coordinated account</p> <p>13 creation using burst detection and network</p> <p>14 analysis", this has a different title. Why is that?</p> <p>15 A I do not know. I would have to check to</p> <p>16 see the copy of the article that I provided, on what</p> <p>17 the actual name is.</p> <p>18 Q Well, it can't be both, right?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: I would say not.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q Is this what a hallucinated cite looks</p> <p>23 like? It has plausible but factually incorrect</p> <p>24 information?</p> <p>25 MR. FRITZ: Objection. You can answer.</p>

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<p style="text-align: right;">Page 130</p> <p>1 THE WITNESS: I'm sorry. Hallucinated</p> <p>2 cite or citation?</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Hallucinated cite. Is there a</p> <p>5 difference?</p> <p>6 A I'm not sure what a hallucinated cite is.</p> <p>7 That's why I wanted to clarify.</p> <p>8 Q Okay. Well, is this a hallucination?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 THE WITNESS: I wouldn't say that. No.</p> <p>11 I would say that it's probably wrong if the two</p> <p>12 don't match. But I wouldn't say it's a</p> <p>13 hallucination.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q Well, what is the explanation for the two</p> <p>16 not matching?</p> <p>17 MR. FRITZ: Objection. You can answer</p> <p>18 again.</p> <p>19 THE WITNESS: Possible error.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Okay. Well, let's look at one of the</p> <p>22 articles that your counsel provided us. I'm going</p> <p>23 to move and mark as Exhibit -- where are we, 5?</p> <p>24 THE STENOGRAPHIC REPORTER: Yes. We're</p> <p>25 on Exhibit 5.</p>	<p style="text-align: right;">Page 132</p> <p>1 Q What do those numbers, 1139 to 1160,</p> <p>2 indicate?</p> <p>3 A It should be the journal, the page,</p> <p>4 the -- I'm not sure.</p> <p>5 Q The page number where the journal starts,</p> <p>6 where the article starts?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: Honestly, I can't remember</p> <p>9 how that is usually signified. But something to</p> <p>10 that effect. Yes.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q Let's go to the next page and you will</p> <p>13 see 1140. Does that help explain what those numbers</p> <p>14 indicated?</p> <p>15 A Yes. So I'm assuming it's the page, yes.</p> <p>16 Q So the pages of this particular article</p> <p>17 is 1139 to 1160 in the Journal of Computational</p> <p>18 Social Science?</p> <p>19 A Yes.</p> <p>20 Q Who are the authors of this paper?</p> <p>21 A Timothy Graham, Sam Hames, and Elizabeth</p> <p>22 Alpert.</p> <p>23 Q Okay. And those are the only three</p> <p>24 authors listed here, right?</p> <p>25 A Yes. On this publication, yes.</p>
<p style="text-align: right;">Page 131</p> <p>1 (Exhibit 5 marked for identification.)</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q Okay. I'm going to introduce Exhibit 5,</p> <p>4 and it should be in marked exhibits, if you can open</p> <p>5 that.</p> <p>6 A Yes, I have it.</p> <p>7 Q And what is this?</p> <p>8 A It appears to be from the Journal of</p> <p>9 Computational Science. It's an article, "The</p> <p>10 coordination network toolkit."</p> <p>11 Q "The coordination network toolkit: A</p> <p>12 framework for detecting and analyzing coordinated</p> <p>13 behavior", right?</p> <p>14 A On social media. Yes.</p> <p>15 Q This is from -- this is from the Journal</p> <p>16 of Computational Social Science. If you look at the</p> <p>17 top. That's right, right?</p> <p>18 A That's what is listed. Yes.</p> <p>19 Q This is also not one of the journals you</p> <p>20 regularly read?</p> <p>21 A No.</p> <p>22 Q And if you look at the top, it says</p> <p>23 7.1139 to 1160.</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 133</p> <p>1 Q Are you familiar with who those</p> <p>2 individuals are?</p> <p>3 A No.</p> <p>4 Q Do you know anything about them?</p> <p>5 A No.</p> <p>6 Q Do you know anything about the quality of</p> <p>7 their research?</p> <p>8 A No.</p> <p>9 Q How did you identify this article?</p> <p>10 MR. FRITZ: Objection. You can answer.</p> <p>11 THE WITNESS: I don't know how I</p> <p>12 identified it.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q How did you know about it?</p> <p>15 A It could have been one of the ones that</p> <p>16 have it -- I have a myriad of references to</p> <p>17 different articles.</p> <p>18 Q I understand. But how did you decide to</p> <p>19 review this article for purposes of your report?</p> <p>20 MR. FRITZ: Objection. You can answer</p> <p>21 again.</p> <p>22 THE WITNESS: I'm not sure how I selected</p> <p>23 this particular article.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q Well, who would have selected it for you?</p>

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<p style="text-align: right;">Page 134</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: I would have selected it</p> <p>3 for myself.</p> <p>4 BY MS. GOVERNSKI:</p> <p>5 Q How would you have -- how did you find</p> <p>6 it?</p> <p>7 A I have, as I mentioned, I have a lot of</p> <p>8 articles that I either have read, I've clipped. I</p> <p>9 have numerous articles that I've read previously and</p> <p>10 I store, and then I usually sort through them.</p> <p>11 Q I understand. But you don't have a</p> <p>12 recollection of doing that with respect to this</p> <p>13 article?</p> <p>14 A I don't have a recollection of how I</p> <p>15 chose the specific article.</p> <p>16 Q Okay. Did you read the entirety of this</p> <p>17 paper?</p> <p>18 A Probably not recently. But yes, at some</p> <p>19 point.</p> <p>20 Q Well, recently, like at some point, what</p> <p>21 do you mean?</p> <p>22 A I didn't review this for the deposition.</p> <p>23 I would have read this probably months ago. But</p> <p>24 yes.</p> <p>25 Q You said you were retained in September,</p>	<p style="text-align: right;">Page 136</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Okay. And what are some of the specific</p> <p>3 tools that they identify?</p> <p>4 MR. FRITZ: Objection.</p> <p>5 THE WITNESS: I don't know this</p> <p>6 particular one just offhand.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Okay. Can you name one of the tools that</p> <p>9 this article identifies?</p> <p>10 A One from the toolkit? No.</p> <p>11 Q Okay. Does this paper provide any formal</p> <p>12 definition of coordinated behavior in social media?</p> <p>13 A I would have to go through and read it</p> <p>14 again.</p> <p>15 Q Okay. Well, as you reviewed it for</p> <p>16 purposes of your report, did you rely on any</p> <p>17 definition in this article for coordinated behavior</p> <p>18 in social media?</p> <p>19 A For this one, I'm not sure.</p> <p>20 Q As you sit here today, can you explain</p> <p>21 how this paper defines coordinated behavior in</p> <p>22 social media?</p> <p>23 MR. FRITZ: You want her to review the</p> <p>24 article?</p> <p>25 MS. GOVERNSKI: Kevin, stop with the</p>
<p style="text-align: right;">Page 135</p> <p>1 October. Did you read it since then?</p> <p>2 A Yes.</p> <p>3 Q So can you summarize the contents of this</p> <p>4 paper for me, please?</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: I cannot. Offhand?</p> <p>7 MR. FRITZ: You want her to read the</p> <p>8 entire article now?</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q No. Ms. Alexander, you cite this article</p> <p>11 multiple times in your report. I'm asking for you</p> <p>12 to summarize it.</p> <p>13 MR. FRITZ: Do you want her to read it</p> <p>14 first?</p> <p>15 MS. GOVERNSKI: No. She's supposedly</p> <p>16 read it as she was preparing her report, Kevin.</p> <p>17 Ms. Alexander, I'm asking you to please</p> <p>18 summarize the article that you cited multiple times.</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: I understand that. So the</p> <p>21 article in and of itself is about coordinated</p> <p>22 networks and the toolkit that the authors used to</p> <p>23 identify them. I believe that would be a succinct</p> <p>24 summary.</p> <p>25</p>	<p style="text-align: right;">Page 137</p> <p>1 speaking objections.</p> <p>2 MR. FRITZ: I just want to make sure the</p> <p>3 question is clear --</p> <p>4 MS. GOVERNSKI: No, she's --</p> <p>5 MR. FRITZ: Sorry --</p> <p>6 MS. GOVERNSKI: She cited this. I'm</p> <p>7 entitled to her information that she has in her</p> <p>8 recollection today, about this article.</p> <p>9 MR. FRITZ: Please try not to interrupt</p> <p>10 me. I just want to make sure that the witness and I</p> <p>11 both understood what you're asking her. If you're</p> <p>12 asking her from memory, then we understood --</p> <p>13 MS. GOVERNSKI: Ash, please repeat back</p> <p>14 my question which said, "as you sit here today."</p> <p>15 MR. FRITZ: Sorry, I don't know why you</p> <p>16 interrupted me again. I excused it the first time</p> <p>17 because I thought it was a mistake, and now I'm</p> <p>18 learning it might not be. So you should just make</p> <p>19 clear whether you want her to go from memory or you</p> <p>20 want her to read the article. That's all I'm</p> <p>21 asking.</p> <p>22 MS. GOVERNSKI: Mr. Fritz, you should</p> <p>23 stop with your speaking objections. Ash, please</p> <p>24 read back the question I asked.</p> <p>25 THE REPORTER: All right. Last question.</p>

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<p style="text-align: right;">Page 138</p> <p>1 (Record read as follows: 2 "QUESTION: As you sit here today, can 3 you explain how this paper defines 4 coordinated behavior in social media?") 5 MR. FRITZ: So sitting here today, do you 6 want her to scroll through the entire thing? 7 MS. GOVERNSKI: Mr. Fritz, stop with the 8 speaking objections. No, I am going to have to call 9 the Court. It's my deposition. Stop with the 10 speaking objections. Ms. Alexander, as you -- 11 MR. FRITZ: We can call the Court if 12 you'd like, because you keep interrupting me. 13 BY MS. GOVERNSKI: 14 Q Ms. Alexander, as you sit here today -- 15 MR. FRITZ: I just want to understand 16 your question. 17 MS. GOVERNSKI: As she sits here today, 18 I'm entitled to her recollection as she sits here 19 today. 20 MR. FRITZ: Just so the record is clear, 21 you do not want her to read the article now? 22 MS. GOVERNSKI: No. She relied on it in 23 her report. As you sit here today -- can you please 24 repeat the question back, Ash, because Mr. Fritz's 25 one minute long speaking objection has distracted me</p>	<p style="text-align: right;">Page 140</p> <p>1 and control hubs." 2 Please identify what parts of this 3 article you used to support that statement. 4 MR. FRITZ: Objection. You can answer. 5 THE WITNESS: Specifically, I would have 6 to go through to reference the page and the location 7 of -- I would have to look to see how I used it 8 within the report and then go through the paper to 9 see how I cited it. 10 MS. GOVERNSKI: Okay. So let's do that. 11 Let's go to 109 in your report. 12 MR. FRITZ: Are you saying you want her 13 to read the article now? 14 BY MS. GOVERNSKI: 15 Q No. Go to 109 of your report, is what I 16 said. Paragraph 109. I'm sorry. Let's go to 17 paragraph 87. 18 A Okay. 19 Q Are you at paragraph 87 of your report? 20 A Yes. 21 Q You refer to Graham, et al. 22 Do you see that? 23 A Yes. 24 Q You have a footnote, footnote 11. 25 Do you see that?</p>
<p style="text-align: right;">Page 139</p> <p>1 from what the actual question was. 2 MR. FRITZ: I just wanted to make sure 3 we're all understanding what your question was. 4 MS. GOVERNSKI: Mr. Fritz, stop with the 5 speaking objections. Ash, please repeat back the 6 question. 7 THE REPORTER: (Record read as follows: 8 "QUESTION: As you sit here today, can 9 you explain how this paper defines 10 coordinated behavior in social media?") 11 MR. FRITZ: Objection. You can answer. 12 THE WITNESS: I cannot offhand without 13 going through and referencing the paper. 14 BY MS. GOVERNSKI: 15 Q Okay. You cite to this article in 16 page 87 as the only source for your claim that, 17 quote: 18 (As read): 19 "Coordinated influence operations 20 exhibit distinctive network 21 fingerprints, tight temporal 22 synchronization, limited participant 23 dispersion, high clustering 24 coefficients, and centralized network 25 structures with identifiable command</p>	<p style="text-align: right;">Page 141</p> <p>1 A Yes. 2 Q If you can look at this footnote, it says 3 "Graham, et al." and you see the title here, right? 4 "Detecting coordination networks in 5 social media." 6 Do you see that? 7 A Yes. 8 Q So that's a different title than what we 9 just discussed which was "The coordination network 10 toolkit: A framework for detecting and analyzing 11 coordinated behavior on social media", right? 12 You can go back and look at Exhibit 5. 13 A Okay. 14 Q And you can see the two titles don't 15 match again, right? 16 MR. FRITZ: Objection. 17 THE WITNESS: To what I have listed in 18 the references? 19 BY MS. GOVERNSKI: 20 Q No. The actual article. 21 A Okay. 22 Q The actual article, you've read the title 23 as being "The coordination network toolkit: A 24 framework for directing and analyzing coordinated 25 behavior on social media."</p>

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<p style="text-align: right;">Page 142</p> <p>1 That's not the same title as "Detecting 2 coordination networks in social media", right? 3 MR. FRITZ: Objection. You can answer. 4 THE WITNESS: That is not. 5 BY MS. GOVERNSKI: 6 Q So why is there different titles here? 7 A I am not sure. 8 Q Okay. And then we talked about the page 9 numbers and we talked about the page numbers 1139 to 10 1160 represent the number of pages that reflect this 11 article, right? 12 A Yes. 13 Q Okay. Let's look at this footnote. You 14 cite pages 23 to 47. 15 Do you see that? 16 A I do. 17 Q And this is the -- those are the page 18 numbers that you say supports this statement: 19 (As read): 20 "These findings align closely with 21 recent computational social science 22 research." 23 Which is the sentence I just read. So 24 please direct me to pages 23 to 47 in Exhibit 5. 25 A So I'm assuming this is an error. But I</p>	<p style="text-align: right;">Page 144</p> <p>1 MR. FRITZ: Objection. 2 THE WITNESS: By definition, no. 3 BY MS. GOVERNSKI: 4 Q If it made up authors who were not the 5 authors, that would not be a hallucination? 6 MR. FRITZ: Objection. 7 THE WITNESS: If a generative AI solution 8 made up authors, then yes, that would be a 9 hallucination. 10 BY MS. GOVERNSKI: 11 Q Okay. So let's look at Exhibit 55, which 12 we already talked about. And we talked about the 13 three authors. You recall that, Graham, Hames and 14 Alpert. Do you recall that those were the only 15 three authors identified in this article? 16 A In one that we're looking at, yes. 17 Q Okay. So let's go back to your report, 18 which is Exhibit 002, and let's go to page 108. I'm 19 going to share my screen so it's a little easier. 20 Oh, I am showing my screen, I guess. 21 And you see right here, Graham -- this is 22 the article we're talking about, right? 23 "Detecting coordination networks in 24 social media. 'Journal of Computational Social 25 Science.'"</p>
<p style="text-align: right;">Page 143</p> <p>1 don't -- that's not part of your exhibit. 2 Q Those page numbers don't match the 3 exhibit that your counsel provided to us, right? 4 A It doesn't match the paper that I 5 submitted. No. 6 Q Is this a hallucinated cite -- citation? 7 MR. FRITZ: Objection. 8 THE WITNESS: No, I wouldn't call it 9 hallucinated because it's an actual paper. It's 10 incorrect on the way that it was picked up for the 11 title and the year. 12 BY MS. GOVERNSKI: 13 Q So it says Graham, et al., but if you 14 listed authors who were not the authors who 15 appeared, would that be an indication of a 16 hallucination? 17 A I'm sorry. If I listed authors that did 18 not appear? 19 Q On the publication. 20 A So I think that you're using the word 21 "hallucination." That is not hallucination to me. 22 That is incorrect. But hallucination is different. 23 Q Well, if a citation includes authors who 24 were not the authors of the paper, wouldn't that be 25 a hallucination?</p>	<p style="text-align: right;">Page 145</p> <p>1 Do you see that? 2 A Yes. 3 Q Okay. And you see that it lists 4 additional authors here: Bruns, Zhu, and Campbell. 5 Do you see that? 6 A Yes. 7 Q Those authors were not in the article, 8 right? 9 A On the article we looked at, no, they 10 were not. 11 Q Well, do you have any reason to believe 12 that the other article that your counsel provided to 13 us as this article is not the article that you 14 intended to reference here? 15 A No, I believe it is the article I 16 intended to reference. 17 Q So how can you explain a citation that 18 makes up authors who are not the authors identified 19 in the article? 20 MR. FRITZ: Objection. 21 You can answer again. 22 THE WITNESS: I'm sorry, Kevin? 23 MR. FRITZ: You can answer. 24 THE WITNESS: Oh. So there are a couple 25 of things wrong. So it's -- in general, it's just</p>

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<p style="text-align: right;">Page 146</p> <p>1 incorrect. I mean, outside of the author, the date</p> <p>2 is also incorrect, so...</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Right. So how did -- you just said</p> <p>5 earlier that if a cite -- citation were to include</p> <p>6 authors who did not appear on the article, it would</p> <p>7 be a sign of a hallucination.</p> <p>8 MR. FRITZ: Objection.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q How is that not the case here?</p> <p>11 A So I believe I said if something was</p> <p>12 developed through a generative AI solution that</p> <p>13 added authors, it would be an example of</p> <p>14 hallucination.</p> <p>15 Q And how do you know that's not the case</p> <p>16 here?</p> <p>17 A Because I know this wasn't generated by</p> <p>18 generative AI.</p> <p>19 Q Okay. Well, let's look at that. Let's</p> <p>20 look at the paragraph that you cite this for,</p> <p>21 paragraph 86.</p> <p>22 MR. FRITZ: Objection.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q Sorry. 87. This is the same paragraph</p> <p>25 we've been looking at, right, where you cite Graham?</p>	<p style="text-align: right;">Page 148</p> <p>1 me know when you have it.</p> <p>2 A I can look at your screen. It's</p> <p>3 taking -- it's taking a while to download.</p> <p>4 Q Okay. This is a GPTZero report. And you</p> <p>5 will see it has the exact verbatim of paragraph 87.</p> <p>6 Do you see that?</p> <p>7 A Can you zoom in?</p> <p>8 Q Uh-huh. Right here.</p> <p>9 (As read):</p> <p>10 "These findings align closely with</p> <p>11 recent computational social science</p> <p>12 research."</p> <p>13 And you will see it's that same citation</p> <p>14 to Graham that we just looked at in paragraph 87?</p> <p>15 A Okay.</p> <p>16 Q Okay. And at the top, it states that:</p> <p>17 (As read):</p> <p>18 "We are highly confident this text is</p> <p>19 AI generated."</p> <p>20 And lists AI probability at 100 percent.</p> <p>21 Do you see that?</p> <p>22 A I see that.</p> <p>23 Q Do you have any explanation for GPTZero's</p> <p>24 finding that it's 100 percent probability that</p> <p>25 paragraph 87 is AI generated?</p>
<p style="text-align: right;">Page 147</p> <p>1 Oh, by the way, have you ever applied the</p> <p>2 concepts that you cite Graham for in your</p> <p>3 professional life?</p> <p>4 A I'm sorry, which concepts are we</p> <p>5 specifically talking about?</p> <p>6 Q The concepts that you reference here in</p> <p>7 this paragraph 87.</p> <p>8 A So temporal synchronization, yes.</p> <p>9 Participant dispersion, yes. And command and</p> <p>10 control hubs, yes.</p> <p>11 Q Okay. But when you applied those</p> <p>12 concepts, were you relying on Graham?</p> <p>13 A As a practitioner, no.</p> <p>14 MS. GOVERNSKI: So my colleague is going</p> <p>15 to be moving into a document, which I will mark as</p> <p>16 Exhibit 6. Let me know when you have it.</p> <p>17 Autumn, are you here?</p> <p>18 MS. ADAMS-JACK: I'm here. I just</p> <p>19 entered it in. It says it's being introduced.</p> <p>20 (Exhibit 6 marked for identification.)</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q Okay. Do you have that document,</p> <p>23 Exhibit 6, up?</p> <p>24 A It's downloading right now.</p> <p>25 Q Okay. I'm also sharing my screen. Let</p>	<p style="text-align: right;">Page 149</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: No.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q You have no explanation for that?</p> <p>5 MR. FRITZ: Objection. You can answer</p> <p>6 again.</p> <p>7 THE WITNESS: I do not. As I mentioned</p> <p>8 earlier, I don't believe in AI analysis for the use</p> <p>9 of identifying if something is generative AI. I</p> <p>10 think we talked about that earlier.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q So if another -- if Grammarly found the</p> <p>13 same paragraph had a 70 percent chance of being</p> <p>14 generated by AI, would that change your perception</p> <p>15 at all?</p> <p>16 A So Grammarly has a feature that is also</p> <p>17 an AI checker --</p> <p>18 Q Uh-huh.</p> <p>19 A -- which, again, is -- is similar to what</p> <p>20 I mentioned earlier with the accuracy of overall AI</p> <p>21 checkers.</p> <p>22 Q Okay. So what about the fact that</p> <p>23 GPTZero predicted this paragraph was 100 percent</p> <p>24 likely to be AI, and Grammarly predicted this</p> <p>25 paragraph to be 70 percent, your response is that</p>

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<p style="text-align: right;">Page 150</p> <p>1 both GPTZero and Grammarly must be inaccurate?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 You can answer again.</p> <p>4 THE WITNESS: So I don't think it's about</p> <p>5 the inaccuracy. I think it's about AI generator</p> <p>6 checks not simply being accurate. And research,</p> <p>7 outside of my statement, has also seen this to be</p> <p>8 true.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q Okay. And then a third AI checker,</p> <p>11 TextGuard, found this one paragraph to be 86 percent</p> <p>12 likely to be AI. So I'm just trying to understand,</p> <p>13 is it your testimony that that is just a</p> <p>14 coincidence?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 You can answer again.</p> <p>17 THE WITNESS: My testimony is that AI</p> <p>18 generator checks are -- are inadequate and not</p> <p>19 accurate.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q How come the paragraphs in your report</p> <p>22 that describe your background all came back as human</p> <p>23 generated?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: I do not know why.</p>	<p style="text-align: right;">Page 152</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q So do you have any explanation for why</p> <p>3 164 paragraphs out of 200 in your report had an</p> <p>4 80 percent likelihood of being AI?</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: I don't know.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Okay. Let's go back to your report where</p> <p>9 you cite Graham again. And I'm sharing it on my</p> <p>10 screen for ease of use.</p> <p>11 Do you see paragraph 97?</p> <p>12 MR. FRITZ: I would use the Exhibit</p> <p>13 Share, Ms. Alexander.</p> <p>14 THE WITNESS: I'm there.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q Okay. And you see that in the first</p> <p>17 paragraph, you -- you cite Graham, Howard and</p> <p>18 Woolley and Ferrara.</p> <p>19 Do you see that?</p> <p>20 A I do.</p> <p>21 Q Okay. What is the Howard and Woolley</p> <p>22 article?</p> <p>23 A I would have to go back to reference the</p> <p>24 documents or the articles that I submitted.</p> <p>25 Q As you sit here today, based on your</p>
<p style="text-align: right;">Page 151</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q And why did the paragraphs in</p> <p>3 Dr. Mayzlin's report come back as zero percent AI</p> <p>4 generated?</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: I couldn't answer that.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Do you have any explanation for why</p> <p>9 GPTZero would predict that 101 paragraphs of your</p> <p>10 report have a 100 percent probability of being AI?</p> <p>11 MR. FRITZ: Objection.</p> <p>12 THE WITNESS: I couldn't answer that.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q Do you have any explanation for why</p> <p>15 GPTZero predicted that an additional 28 paragraphs</p> <p>16 of your report had a 90 percent probability of being</p> <p>17 AI?</p> <p>18 MR. FRITZ: Objection.</p> <p>19 THE WITNESS: I still can't answer that.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q And do you have any explanation for why</p> <p>22 GPTZero predicted that another 35 paragraphs of your</p> <p>23 report had a 80 percent probability of being AI?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: I can't answer that.</p>	<p style="text-align: right;">Page 153</p> <p>1 recollection, what is this article about?</p> <p>2 A I can't tell you offhand. I would</p> <p>3 have -- I'd have to reference the article itself.</p> <p>4 Q Okay. As you sit here today, can you</p> <p>5 explain why the Howard and Woolley article support</p> <p>6 the statements in this paragraph?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: I cannot.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q What about Ferrara, et al., what do you</p> <p>11 recall about that article?</p> <p>12 A I'd have to look at the article.</p> <p>13 Q As you sit here today, do you have any</p> <p>14 recollection about what that article was about?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: I don't know offhand.</p> <p>17 BY MS. GOVERNSKI:</p> <p>18 Q And as you sit today, do you have any</p> <p>19 recollection for how the article by Ferrara supports</p> <p>20 any of the statements in paragraph 97?</p> <p>21 MR. FRITZ: Objection.</p> <p>22 THE WITNESS: Without referencing the</p> <p>23 article, no.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q And did you write this paragraph?</p>

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<p style="text-align: right;">Page 154</p> <p>1 A Yes.</p> <p>2 Q Every word?</p> <p>3 A So the citations themselves, I get from</p> <p>4 Zotero, but yes, the copy itself, yes.</p> <p>5 Q Any idea how GPTZero would predict the</p> <p>6 likelihood of this paragraph?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: I don't know.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q Would you be surprised to learn that</p> <p>11 GPTZero projected that this paragraph was</p> <p>12 100 percent likely to be AI generated?</p> <p>13 MR. FRITZ: Objection.</p> <p>14 You can answer.</p> <p>15 THE WITNESS: I'm sorry. What was the</p> <p>16 question there? I apologize.</p> <p>17 BY MS. GOVERNSKI:</p> <p>18 Q Would you be surprised to learn that</p> <p>19 GPTZero predicted that there was 100 percent</p> <p>20 likelihood that this paragraph was AI generated?</p> <p>21 MR. FRITZ: Objection.</p> <p>22 THE WITNESS: It wouldn't surprise or not</p> <p>23 surprise me.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q Okay. And then TextGuard also found that</p>	<p style="text-align: right;">Page 156</p> <p>1 Q And not academia, right?</p> <p>2 A I believe this is also associated in</p> <p>3 academia, yes, correct.</p> <p>4 Q What academia?</p> <p>5 A I'm sorry, what do you mean by "what</p> <p>6 academia"?</p> <p>7 Q What academia supports these specific</p> <p>8 bullets that we've been discussing?</p> <p>9 A There is research around account</p> <p>10 clustering, sentiment homogeneity, across data</p> <p>11 analysis and computational science.</p> <p>12 Q Okay. And what is that academia?</p> <p>13 A I believe you're asking if I can cite the</p> <p>14 authors and/or a paper. I can't do that offhand.</p> <p>15 Q I'm asking for the basis of the bullets</p> <p>16 that don't include a citation.</p> <p>17 MR. FRITZ: Objection.</p> <p>18 You can answer again.</p> <p>19 THE WITNESS: It's from my lived</p> <p>20 experience, as well as, I believe, norms across</p> <p>21 social analysis of social media in academia as well.</p> <p>22 BY MS. GOVERNSKI:</p> <p>23 Q Okay. But you can't, as you sit here</p> <p>24 today, cite any academia that supports these</p> <p>25 specific bullets?</p>
<p style="text-align: right;">Page 155</p> <p>1 this paragraph was 92 percent most likely to be AI</p> <p>2 generated. Would that surprise you?</p> <p>3 MR. FRITZ: Objection.</p> <p>4 THE WITNESS: Same answer. I wouldn't be</p> <p>5 surprised or not surprised.</p> <p>6 BY MS. GOVERNSKI:</p> <p>7 Q Okay. And so these bullets here:</p> <p>8 (As read):</p> <p>9 "Centralized amplification hubs,</p> <p>10 Temporal synchronization, Sentiment</p> <p>11 homogeneity."</p> <p>12 You wrote -- it's your testimony that you</p> <p>13 wrote these bullets?</p> <p>14 A Yes.</p> <p>15 Q Okay. And there's no citation for these</p> <p>16 bullets. So is this one of those examples where the</p> <p>17 basis for these are just your own experience?</p> <p>18 A Yes. Those are also some of the same</p> <p>19 verbiage I used earlier when we talked about the</p> <p>20 work that I did at Meta as well as at Ipsos.</p> <p>21 Q Right. So that verbiage, and when you</p> <p>22 talked about it earlier, that's not based on</p> <p>23 academia; that's just based on your own experience?</p> <p>24 A That's based on my expert experience,</p> <p>25 yes.</p>	<p style="text-align: right;">Page 157</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: I can't provide an author</p> <p>3 and a paper offhand.</p> <p>4 BY MS. GOVERNSKI:</p> <p>5 Q I'm not asking for the paper and the</p> <p>6 author, but just what academia supports these</p> <p>7 specific bullets?</p> <p>8 MR. FRITZ: Same objection.</p> <p>9 THE WITNESS: Maybe I don't understand</p> <p>10 the question when you say which academia. So</p> <p>11 looking at marketing and social analysis in</p> <p>12 academia, right, which is a discipline, so there's</p> <p>13 been research done to show coordinated</p> <p>14 fingerprinting in academia, as well as on the</p> <p>15 practitioner side.</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q I'm trying to identify and understand</p> <p>18 what academia you relied on when you came up with</p> <p>19 this bulleted list.</p> <p>20 A The bulleted list is based on my lived</p> <p>21 experience, as I mentioned. But it's also</p> <p>22 supported, in addition, in academic research.</p> <p>23 Q And I'm entitled to know what academic</p> <p>24 research you relied on for coming up with these</p> <p>25 bullets.</p>

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<p style="text-align: right;">Page 158</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: So I think we're saying --</p> <p>3 I'm saying the same thing over and over again. So</p> <p>4 it's based on the research that I've done, myself,</p> <p>5 as a practitioner. And in addition to that, I also</p> <p>6 believe that there is research on these particular</p> <p>7 elements across marketing science and social</p> <p>8 analysis. I do not have -- before you ask -- I do</p> <p>9 not have a citation to offer you offhand.</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q So your report does not disclose the</p> <p>12 academia on which you relied for these paragraphs in</p> <p>13 paragraph 97?</p> <p>14 MR. FRITZ: Objection.</p> <p>15 THE WITNESS: That's incorrect --</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q So --</p> <p>18 A -- as I stated.</p> <p>19 Q -- what is the academia? Yeah, go on.</p> <p>20 Sorry.</p> <p>21 A It's based on my experience as a</p> <p>22 practitioner, period. I'm saying I also believe, in</p> <p>23 addition to that being the basis of the bullets, I</p> <p>24 also believe that there is academic research that</p> <p>25 supports it as well.</p>	<p style="text-align: right;">Page 160</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q And how would you go about finding that</p> <p>3 out?</p> <p>4 A I would do a scholar search based on</p> <p>5 keywords.</p> <p>6 Q And you can do that?</p> <p>7 A Yes.</p> <p>8 Q So why didn't you do that when you were</p> <p>9 putting together Appendix C?</p> <p>10 A So as I mentioned, for this particular</p> <p>11 content, again, it's based on practitioner work,</p> <p>12 which would not be needed for an academic citation.</p> <p>13 Q Okay. Let's go to your Appendix C, where</p> <p>14 you, again, are expected to list all of the</p> <p>15 materials that form the basis of your opinion. And</p> <p>16 on page 108, you cite a legal case called Daubert.</p> <p>17 Do you see that?</p> <p>18 A Yes.</p> <p>19 Q Why did you list Daubert?</p> <p>20 A Daubert is something I read early on when</p> <p>21 I -- when I was -- when this -- when the litigation</p> <p>22 first was presented to me.</p> <p>23 Q Why did you read Daubert?</p> <p>24 A For just research and knowledge.</p> <p>25 Q Did you just decide on your own to read</p>
<p style="text-align: right;">Page 159</p> <p>1 Q But that's a belief based on your</p> <p>2 intuition and not what is cited in your report?</p> <p>3 MR. FRITZ: Objection.</p> <p>4 THE WITNESS: It's based on my</p> <p>5 understanding of articles I've read across academia</p> <p>6 of different conferences, a myriad of other things.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q And do you understand that you're</p> <p>9 required to identify all of the academia that</p> <p>10 supports the opinions that you're offering in this</p> <p>11 case?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: I understand that if I'm</p> <p>14 using academic sources. As I mentioned in my last</p> <p>15 answer, these bullets, first and foremost, are based</p> <p>16 on my practitioner experience.</p> <p>17 BY MS. GOVERNSKI:</p> <p>18 Q And you cannot, as you sit here today,</p> <p>19 think of any of the articles that inform these</p> <p>20 bullets?</p> <p>21 MR. FRITZ: Objection.</p> <p>22 THE WITNESS: Of the citations, no, I</p> <p>23 cannot. Of referencing a title of a paper and the</p> <p>24 authors, no, I cannot.</p> <p>25</p>	<p style="text-align: right;">Page 161</p> <p>1 Daubert?</p> <p>2 MR. FRITZ: I would instruct the witness</p> <p>3 to the extent your answer requires you to disclose</p> <p>4 substantive communications with counsel, you not</p> <p>5 reveal that. But independent of that, go ahead.</p> <p>6 THE WITNESS: So it was nothing to do</p> <p>7 with any conversation with counsel. It was</p> <p>8 something that I did just proactively.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q Okay. How did you learn about Daubert?</p> <p>11 A Honestly, I think I Googled it.</p> <p>12 Q Okay. What prompted you to Google</p> <p>13 Daubert?</p> <p>14 A The engagement with GLG.</p> <p>15 Q The engagement with GLG or -- like 12</p> <p>16 years ago or in this case?</p> <p>17 A When GLG reached out to me regarding a</p> <p>18 potential litigation case, I Googled it.</p> <p>19 Q Okay. And what is your understanding of</p> <p>20 Daubert?</p> <p>21 A So this was -- I read it a while ago. I</p> <p>22 can't quote the case but it talks about</p> <p>23 methodology -- methodology rigor and being able</p> <p>24 to -- sorry, I'm paraphrasing -- source and have a</p> <p>25 chain of custody, I believe. Something to that</p>

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<p style="text-align: right;">Page 162</p> <p>1 effect on how you represent information.</p> <p>2 Q And is your entire understanding of what</p> <p>3 Daubert stands for based on your own Google search?</p> <p>4 A Yes, based on my own reading, correct.</p> <p>5 Q Okay. You're not a lawyer?</p> <p>6 A No, I'm not.</p> <p>7 Q Do you hold yourself out as an expert on</p> <p>8 the Daubert standards?</p> <p>9 A Not at all.</p> <p>10 Q So when your ninth opinion states that</p> <p>11 the methodologies employed in this analysis meet</p> <p>12 established standards, you have no expertise in</p> <p>13 determining what meets Daubert standards, right?</p> <p>14 A Outside of what I read, no.</p> <p>15 Q Outside of what you read on Google?</p> <p>16 A Well, actually, outside of what I read on</p> <p>17 the U.S. Justice website.</p> <p>18 Q Okay. You have no independent experience</p> <p>19 other than having read the case?</p> <p>20 A Correct.</p> <p>21 Q And you talk about Daubert in paragraphs</p> <p>22 100 to 106 of your report. And you write:</p> <p>23 (As read):</p> <p>24 "Under the Daubert standard and its</p> <p>25 progeny, Courts evaluate expert</p>	<p style="text-align: right;">Page 164</p> <p>1 progeny, Courts evaluate expert</p> <p>2 methodology based on several key</p> <p>3 criteria."</p> <p>4 A I mean, it's --</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: Again, I probably read it</p> <p>7 on the Justice's website.</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q Okay. And I don't understand why you</p> <p>10 were offering an opinion on whether your methodology</p> <p>11 meets Daubert's standard if you're not an expert in</p> <p>12 Daubert. Can you please explain?</p> <p>13 MR. FRITZ: Objection.</p> <p>14 THE WITNESS: So I added that in</p> <p>15 specifically to ensure that I, my work, would meet</p> <p>16 the criteria that would be relevant for the report</p> <p>17 itself.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Even though you have no expertise in the</p> <p>20 Daubert standards?</p> <p>21 A Outside of what I read, no.</p> <p>22 Q Okay. What is your understanding of what</p> <p>23 your assignment was in this case?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 You can answer again.</p>
<p style="text-align: right;">Page 163</p> <p>1 methodology based on several criteria."</p> <p>2 What is your understanding of Daubert</p> <p>3 progeny?</p> <p>4 A So it is the case -- the components,</p> <p>5 based on what I downloaded and read from the U.S. --</p> <p>6 U.S. Justice's website.</p> <p>7 Q Okay. And you wrote that sentence,</p> <p>8 "under the Daubert standard and its progeny"?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q Okay. And would it surprise you that</p> <p>13 GPTZero predicted this paragraph also to be</p> <p>14 100 percent likely to be AI?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: Okay. Is it the word</p> <p>17 "progeny" that's -- I'm sorry. I'm confused about</p> <p>18 that. It's a case and then it's the word "progeny"</p> <p>19 added onto it. So I'm not sure what would be</p> <p>20 generative AI about that.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q I'm just trying to understand how you</p> <p>23 came up with the sentence:</p> <p>24 (As read):</p> <p>25 "Under the Daubert standard and its</p>	<p style="text-align: right;">Page 165</p> <p>1 THE WITNESS: So -- excuse me. So my</p> <p>2 assignment was to -- as a rebuttal expert, was to</p> <p>3 review the plaintiff's experts -- well, select</p> <p>4 expert reports and offer my perspective on if the</p> <p>5 inferences made on the reports were accurate. If</p> <p>6 there were areas that I would say made sense, didn't</p> <p>7 make sense, answering questions around specifically</p> <p>8 is a campaign inorganic or organic, and offering any</p> <p>9 additional context in regards to Dr. Mayzlin's</p> <p>10 report or Dr. Humphrey's report.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q Were those terms, "organic" and</p> <p>13 "inorganic" specifically used when discussing your</p> <p>14 assignment with you?</p> <p>15 A That term --</p> <p>16 MR. FRITZ: Hold on. Hold on.</p> <p>17 To the extent your -- extent the question</p> <p>18 and your response is calling for the disclosure of</p> <p>19 information that would be protected by the</p> <p>20 attorney-client privilege, I would instruct you not</p> <p>21 to answer. And that is how I understood the</p> <p>22 question.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q What is your -- you used the terms</p> <p>25 "organic" and "inorganic" to describe your</p>

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<p style="text-align: right;">Page 166</p> <p>1 assignment, right?</p> <p>2 A I did, yes.</p> <p>3 Q Okay. And you understood that your</p> <p>4 assignment was to make the determination between</p> <p>5 organic and inorganic, those specific words?</p> <p>6 A So that was not the charge. I used that</p> <p>7 based on the way that I looked at the analysis.</p> <p>8 Q Okay. What was the charge?</p> <p>9 A Excuse me. The charge was to --</p> <p>10 MR. FRITZ: Objection.</p> <p>11 You can answer again.</p> <p>12 THE WITNESS: The charge was to read</p> <p>13 through Dr. Mayzlin's and Dr. Humphrey's reports and</p> <p>14 offer any perspective as a rebuttal witness to see</p> <p>15 if the outcomes, the inferences that they made or</p> <p>16 the way that they analyzed the data was accurate or</p> <p>17 inaccurate.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q And that was the entire scope of your</p> <p>20 assignment?</p> <p>21 A Yes, that was the charge I was given.</p> <p>22 Q Okay. So when did you receive the expert</p> <p>23 reports that you were assigned to rebut?</p> <p>24 A I'm not sure of the exact date. I know</p> <p>25 there was only about two-and-a-half-weeks turnaround</p>	<p style="text-align: right;">Page 168</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: I can't recall the name of</p> <p>3 the article. It's in my report as a footnote. I</p> <p>4 originally read through the article and was going to</p> <p>5 use it within the context of my report. I decided</p> <p>6 not to, and I removed the -- the commentary but left</p> <p>7 the footnote.</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q And you didn't list that, actually, in</p> <p>10 your Appendix C C. Why is that?</p> <p>11 A Because I didn't end up using the -- her</p> <p>12 article.</p> <p>13 Q But you read her article --</p> <p>14 A I did.</p> <p>15 Q -- in THE context of preparing your</p> <p>16 report?</p> <p>17 A Yes, I read the article.</p> <p>18 Q And who told -- sorry. Strike that.</p> <p>19 How did you decide that you didn't need</p> <p>20 to list it in Appendix C C?</p> <p>21 A To my understanding, the materials relied</p> <p>22 upon was the materials that I relied upon for the</p> <p>23 final report. So based on the content that was in</p> <p>24 that report.</p> <p>25 Q So it's your testimony that your</p>
<p style="text-align: right;">Page 167</p> <p>1 time for November 3rd. So I would say</p> <p>2 November 3rd, backing that out by two and a half</p> <p>3 weeks.</p> <p>4 Q Yeah, like October 17th is, I believe,</p> <p>5 the date that the experts were served, so that</p> <p>6 sounds about right.</p> <p>7 So did you start -- so did you and</p> <p>8 Ms. Hunter start your data analysis before that time</p> <p>9 or only after you received the reports?</p> <p>10 A After we received the reports.</p> <p>11 Q What is your experience with Dr. Mayzlin?</p> <p>12 A I don't know Dr. Mayzlin.</p> <p>13 Q Have you ever met Dr. Mayzlin?</p> <p>14 A No.</p> <p>15 Q You cite in your report an article by</p> <p>16 Dr. Mayzlin. Do you recall reading an article that</p> <p>17 she wrote?</p> <p>18 A I do.</p> <p>19 Q Okay. Tell me about it.</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 169</p> <p>1 Appendix C C does not include everything that you've</p> <p>2 reviewed in the course of preparing your report but</p> <p>3 only the things that you determined you would rely</p> <p>4 upon?</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: Correct. I believe, yes.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q So why did you cite the Mayzlin study and</p> <p>9 then keep the citation in your report, but then not</p> <p>10 list it in your materials considered?</p> <p>11 MR. FRITZ: Objection.</p> <p>12 You can answer again.</p> <p>13 THE WITNESS: I'm sorry. Could you just</p> <p>14 repeat the question?</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q Yeah. It's your testimony that you</p> <p>17 didn't list it in Appendix C Appendix C because you</p> <p>18 didn't rely on it, but you still cite it as support</p> <p>19 in your report. So I'm trying to understand why you</p> <p>20 included it as a citation.</p> <p>21 MR. FRITZ: Objection.</p> <p>22 THE WITNESS: Because I don't cite it in</p> <p>23 my report, I should have removed the footnote when I</p> <p>24 removed the copy from the report.</p> <p>25</p>

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<p style="text-align: right;">Page 170</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Okay. So the footnote that says you</p> <p>3 relied on Mayzlin is inaccurate?</p> <p>4 MR. FRITZ: Objection.</p> <p>5 THE WITNESS: Exactly. It's an echo.</p> <p>6 BY MS. GOVERNSKI:</p> <p>7 Q How many footnotes in your report did you</p> <p>8 not actually rely on?</p> <p>9 A So having gone through it, Dr. Mayzlin's</p> <p>10 specific paper was the only footnote that was left</p> <p>11 that was inaccurate.</p> <p>12 Q Okay. So there were other footnotes that</p> <p>13 were not included in Appendix C C but are still</p> <p>14 included as footnotes. Why is that?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: I'm not sure I understand</p> <p>17 what you're asking.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q There are six other footnote citations</p> <p>20 that reflect publications that are not otherwise</p> <p>21 listed in Appendix C C. Why is that?</p> <p>22 MR. FRITZ: Objection.</p> <p>23 THE WITNESS: I do not know.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q So how are we supposed to know what you</p>	<p style="text-align: right;">Page 172</p> <p>1 versions.</p> <p>2 Q Okay. And when you cite the four expert</p> <p>3 reports, Dr. Mayzlin, Dr. Humphreys, Mr. Culotta,</p> <p>4 and Mr. Kinrich, did you review only the expert</p> <p>5 reports or did you also review their underlying</p> <p>6 data?</p> <p>7 A I reviewed -- I reviewed some of the data</p> <p>8 packages, yes.</p> <p>9 Q Okay. So what data packages did you</p> <p>10 review?</p> <p>11 A I'm sorry -- so the ones that were given</p> <p>12 to me as part of their expert submission, I</p> <p>13 reviewed.</p> <p>14 Q Okay. So you reviewed all of the backup?</p> <p>15 A That was provided to me, yes.</p> <p>16 Q Okay. And did you review all of the</p> <p>17 backup data?</p> <p>18 A I personally read through it, yes.</p> <p>19 Q All of -- well, read through it, but I'm</p> <p>20 talking about the actual data. Did you -- did you</p> <p>21 personally review all of the data in their backup</p> <p>22 materials?</p> <p>23 A Dr. Mayzlin's, yes. Dr. Humphreys', yes.</p> <p>24 For Culotta and Kinrich, I don't remember the data</p> <p>25 packages.</p>
<p style="text-align: right;">Page 171</p> <p>1 relied on based on certain materials cited and</p> <p>2 certain materials not being included in your</p> <p>3 Appendix C?</p> <p>4 MR. FRITZ: Objection.</p> <p>5 THE WITNESS: Should be from my</p> <p>6 Appendix C and from my footnotes.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Okay. But in some cases, what is in</p> <p>9 footnotes actually is not something you've relied</p> <p>10 on?</p> <p>11 A The only example of that is Dr. Mayzlin's</p> <p>12 report -- article.</p> <p>13 Q Why didn't you remove that footnote?</p> <p>14 MR. FRITZ: Objection.</p> <p>15 You can answer again.</p> <p>16 THE WITNESS: It was -- again, it was a</p> <p>17 bit of an echo from versioning, so it should have</p> <p>18 been removed.</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q What does an "echo" mean?</p> <p>21 A It means that it wasn't taken out when</p> <p>22 the content itself was removed.</p> <p>23 Q What content did you remove?</p> <p>24 A I don't remember the specific way that I</p> <p>25 positioned it, but it was in one of the draft</p>	<p style="text-align: right;">Page 173</p> <p>1 Q Okay. And did you review all of the</p> <p>2 materials that any of these experts cited in their</p> <p>3 reports?</p> <p>4 A Did I review each of the articles that</p> <p>5 were cited, no.</p> <p>6 Q Did you review any of the articles that</p> <p>7 they cited?</p> <p>8 A Yes, some.</p> <p>9 Q So if there were articles that they cited</p> <p>10 that you reviewed, did you list them in Appendix C?</p> <p>11 A No, because they were part of the</p> <p>12 experts' submissions. So for instance, with</p> <p>13 Dr. Mayzlin, she provided a myriad of different</p> <p>14 academic articles. I may have reviewed some of</p> <p>15 them, for instance, as -- as part of my job of</p> <p>16 reviewing the experts' submissions.</p> <p>17 Q How are we supposed to understand which</p> <p>18 ones you reviewed and which ones you didn't?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: So to my knowledge, it was</p> <p>21 my job to review all of the experts' submissions,</p> <p>22 but relying on them for my report is different.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q So if you didn't list it in Appendix C,</p> <p>25 then it's your testimony that they are irrelevant to</p>

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<p style="text-align: right;">Page 174</p> <p>1 your report?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 THE WITNESS: It means I did not rely on</p> <p>4 them for my report.</p> <p>5 BY MS. GOVERNSKI:</p> <p>6 Q What does that mean to you, "not rely on</p> <p>7 them"?</p> <p>8 A I did not take the content or context</p> <p>9 into regard into my report.</p> <p>10 Q Okay. So you said that you reviewed</p> <p>11 Dr. Mayzlin's dataset. How many pieces of social</p> <p>12 media items do you understand that Dr. Mayzlin</p> <p>13 reviewed for purposes of her report?</p> <p>14 A She listed 1.1 million, approximately.</p> <p>15 Q Okay. And you testified that you've</p> <p>16 reviewed all of them?</p> <p>17 MR. FRITZ: Objection.</p> <p>18 THE WITNESS: I'm not sure what you mean</p> <p>19 by that, so could you clarify?</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Well, you testified that you reviewed all</p> <p>22 of the data that Dr. Mayzlin provided.</p> <p>23 A Yes, I looked through the dataset.</p> <p>24 Q Okay. So did the dataset include all of</p> <p>25 the social media items that comprised her report?</p>	<p style="text-align: right;">Page 176</p> <p>1 actually argue that neither my dataset nor</p> <p>2 Dr. Mayzlin's set is representative of the overall</p> <p>3 universe that encompasses Blake Lively during the</p> <p>4 given periods of time that we looked at because it's</p> <p>5 physically impossible, based on the data that is</p> <p>6 available to either of us.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Understood. So you cannot, as you sit</p> <p>9 here today, represent that your dataset is</p> <p>10 representative of the full dataset that would be</p> <p>11 reflective of the Blake Lively-related content</p> <p>12 during this time period?</p> <p>13 MR. FRITZ: Objection.</p> <p>14 You can answer again.</p> <p>15 THE WITNESS: So "representative" would</p> <p>16 first have to be defined. Representative of the</p> <p>17 entire mass of data for any given time period, no</p> <p>18 one's dataset is representative unless you're</p> <p>19 looking at a social media platform looking at their</p> <p>20 own data. So anybody with access to second-party or</p> <p>21 third-party data, which would be any of the experts</p> <p>22 involved in this trial, would not have access to</p> <p>23 representative data based on the entire universe.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q I'm asking you specifically about your</p>
<p style="text-align: right;">Page 175</p> <p>1 A I did not go into each individual line of</p> <p>2 data -- like, row of data and read them verbatim.</p> <p>3 Q Okay. Your dataset is 96 percent smaller</p> <p>4 than Dr. Mayzlin's, right?</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: My dataset is 44,000.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q And that's 96 percent smaller than 1.1</p> <p>9 million, right?</p> <p>10 MR. FRITZ: Objection.</p> <p>11 THE WITNESS: 44,000, is my dataset.</p> <p>12 Yeah.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q Okay. Well, can you explain how you can</p> <p>15 be confident that your dataset is representative</p> <p>16 when Dr. Mayzlin's is 96 percent larger?</p> <p>17 A Size is not a signifier of accuracy or --</p> <p>18 of accuracy, I would say.</p> <p>19 Q Right. So I'm asking how could you</p> <p>20 ensure that your 43,992 posts were a representative</p> <p>21 sample?</p> <p>22 MR. FRITZ: Objection.</p> <p>23 You can answer again.</p> <p>24 THE WITNESS: Yeah, so I would say</p> <p>25 representative is extremely difficult. I would</p>	<p style="text-align: right;">Page 177</p> <p>1 report, so if you can stay focused on yourself and</p> <p>2 your own dataset.</p> <p>3 MR. FRITZ: Objection.</p> <p>4 BY MS. GOVERNSKI:</p> <p>5 Q How would you define "representative" in</p> <p>6 the context of your report?</p> <p>7 A So I wouldn't define representative in my</p> <p>8 report because "representative" isn't necessary for</p> <p>9 the data analysis.</p> <p>10 Q Okay. So what does your dataset -- what</p> <p>11 is your dataset comprised of? What does it show?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: It shows five different</p> <p>14 social media networks. So I was representative from</p> <p>15 the diversity of the social media platforms that I</p> <p>16 looked at, which was higher than Dr. Mayzlin's, for</p> <p>17 instance. I looked at X, Reddit, Instagram,</p> <p>18 YouTube, and -- sorry. I'm missing one. Sorry, I'm</p> <p>19 blanking on the fifth one.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q But what is -- it's just representative</p> <p>22 of what posts hit on the search terms; is that what</p> <p>23 it's representative of?</p> <p>24 A So I'm going to not use the word</p> <p>25 "representative" because I think we need to define</p>

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<p style="text-align: right;">Page 178</p> <p>1 what representative means.</p> <p>2 My data is based on the keywords that</p> <p>3 were accessible for public -- public posts, similar</p> <p>4 to, again, anybody not using first-party data.</p> <p>5 Q Okay. Well, how would you use the term</p> <p>6 "representative" generally in your everyday life?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: Representative in my</p> <p>9 everyday life?</p> <p>10 MR. FRITZ: Hold on. Do you mean as a</p> <p>11 verb or a noun?</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q Answer the question as you understand it.</p> <p>14 MR. FRITZ: Go ahead.</p> <p>15 THE WITNESS: So having a research</p> <p>16 background, I would use representative in the</p> <p>17 context of does this represent the majority of</p> <p>18 individuals within a class, a segment, a majority, a</p> <p>19 minority, or the majority of information available.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Okay. Is it your testimony that your</p> <p>22 dataset meets your definition of "representative"?</p> <p>23 MR. FRITZ: Objection.</p> <p>24 You can answer again.</p> <p>25 THE WITNESS: My dataset and no one</p>	<p style="text-align: right;">Page 180</p> <p>1 it that you're trying to conclude?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 THE WITNESS: So when looking at social</p> <p>4 media data, it's not about a representative sample;</p> <p>5 it's about a statistically significant sample.</p> <p>6 Because keywords, in and of themselves, means that</p> <p>7 you're not looking at a representative sample</p> <p>8 because you are only using a specific amount of</p> <p>9 keywords. There are a myriad of different</p> <p>10 combinations that represent Blake Lively globally</p> <p>11 across social media. There's also accounts that are</p> <p>12 inaccessible by any second-party individual trying</p> <p>13 to look and analyze data.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q So if you were to identify an entirely</p> <p>16 separate set of 43,992 social media items, like</p> <p>17 entirely separate, there's no overlap between the</p> <p>18 two, how do you know the results would be the same?</p> <p>19 A Again, the question would be what is the</p> <p>20 second set of data about.</p> <p>21 Q Well, you said that you can't possibly</p> <p>22 identify everything, even if it hits on search</p> <p>23 terms, right?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: No one -- no one can,</p>
<p style="text-align: right;">Page 179</p> <p>1 else's dataset, unless it's a first-party, would be</p> <p>2 representative of the keywords around Blake Lively.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Okay. So just speaking about your</p> <p>5 dataset, I just want to make sure I understand.</p> <p>6 Adopting your definition of "representative," it's</p> <p>7 your testimony that your dataset is not</p> <p>8 representative of the majority of the individual</p> <p>9 statements about Blake Lively during this time</p> <p>10 period?</p> <p>11 MR. FRITZ: Objection.</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q Is that right? I just want to understand</p> <p>14 what your testimony is.</p> <p>15 MR. FRITZ: Same objection.</p> <p>16 THE WITNESS: It's not possible for a</p> <p>17 dataset to be, quote, unquote, representative of all</p> <p>18 of the social media discussion around Blake Lively,</p> <p>19 unless you are a first-party that is -- has access</p> <p>20 to that data, such as Twitter, Instagram, Facebook,</p> <p>21 et cetera.</p> <p>22 BY MS. GOVERNSKI:</p> <p>23 Q Okay. So if you are a scientist and</p> <p>24 you're conducting an experiment, don't you need to</p> <p>25 create a representative sample? Otherwise, what is</p>	<p style="text-align: right;">Page 181</p> <p>1 that's not first-party.</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q Right. So what if someone else searches</p> <p>4 for 43,992 using search terms and that came up with</p> <p>5 a different dataset than the 43,992 that were part</p> <p>6 of your dataset, how could you guarantee that the</p> <p>7 results would be the same?</p> <p>8 MR. FRITZ: Objection.</p> <p>9 THE WITNESS: So by replicating the</p> <p>10 subscription that I referenced, so Apify in this</p> <p>11 case, by representing the prompts that I -- or the</p> <p>12 keywords that I used when inputting them into Apify</p> <p>13 for the same time period, they are replicatable</p> <p>14 based on, again, that criteria.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q Okay. So but -- so it's your testimony</p> <p>17 that the 43,992 represents the entire universe of</p> <p>18 all social media items that hit on your keywords?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Is that -- is that your testimony?</p> <p>22 A I'm sorry. Can you repeat that?</p> <p>23 Q Yeah. Is it your testimony that the</p> <p>24 43,992 items represents the universe of all social</p> <p>25 media items that hit on your search terms?</p>

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<p style="text-align: right;">Page 182</p> <p>1 A The dataset that I reference, as part of 2 my expert report, is the complete dataset that I was 3 able to receive from Apify, based on doing the 4 analysis. 5 Q Okay. So what if someone else was able 6 to use a different Apify tool and come up with 7 43,992 items that are not duplicative of your 8 dataset? 9 MR. FRITZ: Objection. 10 You can answer again. 11 MS. GOVERNSKI: I didn't finish the 12 question. 13 MR. FRITZ: Okay. 14 BY MS. GOVERNSKI: 15 Q How do you know that the outcome would be 16 the same? 17 MR. FRITZ: Same objection. And also, 18 compound. 19 Go ahead. You can answer again. 20 THE WITNESS: So couple of things. The 21 first part of the question is, in order to use the 22 same tool, they would have to use the same inputs, 23 and they would have access to the same underlying 24 dataset through Apify. So if that is done then -- 25 MS. GOVERNSKI: That's not what my</p>	<p style="text-align: right;">Page 184</p> <p>1 hypotheticals that I am not able to answer. 2 BY MS. GOVERNSKI: 3 Q Okay. Let's make it not a hypothetical. 4 You know Dr. Mayzlin's set includes more 5 than a million social media items, right? 6 MR. FRITZ: Objection. 7 THE WITNESS: Her dataset includes 1.1 8 million, yes. 9 BY MS. GOVERNSKI: 10 Q How do you know that applying your 11 methodology to her dataset would result in the same 12 outcome? 13 A I'm sorry. Could you repeat the second 14 part of that question? 15 Q If you were to run Dr. Mayzlin's -- 16 MR. FRITZ: Could I make a suggestion? 17 MS. GOVERNSKI: No, you can't. I'm in 18 the middle of a question. 19 MR. FRITZ: I'm sorry. If she's telling 20 you she doesn't understand the question -- 21 MS. GOVERNSKI: I'm rephrasing it. 22 MR. FRITZ: Excuse me. And she's 23 explaining to you why she doesn't understand it, I'd 24 suggest you wait until she's finished so you 25 completely and fully understand why she's confused.</p>
<p style="text-align: right;">Page 183</p> <p>1 question is. I'm sorry to interrupt, but I just 2 want to make sure you're answering what my question 3 is -- 4 (Cross talk.) 5 MR. FRITZ: Excuse me. Then don't 6 interrupt her. Let her finish, and if you have a 7 follow-up, then ask. 8 Finish your answer, Ms. Alexander. 9 THE WITNESS: If someone were to 10 replicate the process that I went through, through 11 the tool that I went through, using the exact same 12 methods that I did, they should receive -- during 13 the same time period, they should receive the same 14 outputs from Apify that I received. 15 BY MS. GOVERNSKI: 16 Q That's not my question, though. 17 If someone used a different tool on Apify 18 that identified an entirely different dataset than 19 the one that you identified, but also which hit on 20 your search terms, how can you guarantee that the 21 results of your study would be the same as the study 22 of that other dataset? 23 MR. FRITZ: Objection. 24 You can answer again. 25 THE WITNESS: That's a lot of</p>	<p style="text-align: right;">Page 185</p> <p>1 MS. GOVERNSKI: We're going to go off the 2 record. Off the record. I'm going to call the 3 Court about speaking objections. So let's go off 4 the record, please. 5 MR. FRITZ: Go ahead. 6 THE VIDEOGRAPHER: We're off the record. 7 It's 2:53 p.m. 8 (Recess.) 9 (Whereupon, a conference call was had with the Court 10 which has been transcribed and bounded in a separate 11 transcript.) 12 ---0o0--- 13 THE VIDEOGRAPHER: We are back on the 14 record. It's 3:58 p.m. 15 MS. GOVERNSKI: Ms. -- Ashley, do you 16 mind repeating back the last question I asked? 17 THE STENOGRAPHIC REPORTER: Okay. If you 18 give me a few minutes, I have to go all the way 19 back -- 20 MS. GOVERNSKI: Oh, no. That's okay. 21 That's okay. I'm good. 22 BY MS. GOVERNSKI: 23 Q Ms. Alexander, I was asking you if 24 applying the methodology from your report to the 25 dataset in Dr. Mayzlin's analysis would lead to the</p>

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<p style="text-align: right;">Page 186</p> <p>1 same conclusions?</p> <p>2 A That is -- that is not something that I</p> <p>3 would be able to say.</p> <p>4 Q Why is that?</p> <p>5 A So Dr. Mayzlin used an LLM in order to</p> <p>6 get to her outputs. I cannot replicate, based on</p> <p>7 what she's given me, the outcome -- of how she's</p> <p>8 been able to get to those outcomes because it's an</p> <p>9 LLM. If I were to use my dataset -- I'm sorry. If</p> <p>10 I were to use my prompts or queries in an LLM,</p> <p>11 specifically the one that she used, I'm not sure how</p> <p>12 it would come out.</p> <p>13 Q Okay. But I'm asking if you were to</p> <p>14 apply whatever methodology you applied to draw</p> <p>15 conclusions about your dataset, if you applied your</p> <p>16 methodology to her dataset, would the outcome be the</p> <p>17 same?</p> <p>18 MR. FRITZ: Objection.</p> <p>19 THE WITNESS: I would assume not because</p> <p>20 they are different raw datasets.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q Right. So the outcome of your</p> <p>23 methodology depends upon what your dataset was</p> <p>24 comprised off?</p> <p>25 A Outcomes of any analysis comes from the</p>	<p style="text-align: right;">Page 188</p> <p>1 THE WITNESS: So my outputs are based on</p> <p>2 the analysis that I did, based on the APIs that</p> <p>3 pulled raw data from each of those five platforms.</p> <p>4 So I'm taking the data, based on the time frame, the</p> <p>5 queries I provided, and I'm doing analysis of that</p> <p>6 raw dataset.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Right. Analysis of the 43,992 items that</p> <p>9 comprised your dataset?</p> <p>10 A Correct.</p> <p>11 Q In your report, you list -- you list</p> <p>12 eleven opinions. Are those all the opinions you</p> <p>13 intend to offer in this matter?</p> <p>14 A Yes, that's everything I included in the</p> <p>15 report.</p> <p>16 Q You don't intend to offer any other</p> <p>17 opinions that are not listed in your report at</p> <p>18 page -- at the section on your opinions, right?</p> <p>19 A Not based on any of the data that I've</p> <p>20 already looked at. If new information comes into</p> <p>21 play, then I can assert additional opinions. But</p> <p>22 based on everything, all the research I've done, the</p> <p>23 analysis, those are my opinions.</p> <p>24 Q So today as you sit here, the opinion</p> <p>25 section in your report reflects all of your opinions</p>
<p style="text-align: right;">Page 187</p> <p>1 underlying raw data.</p> <p>2 Q And if we were to take 43,000 of the</p> <p>3 social media items from Dr. Mayzlin's dataset that</p> <p>4 was not part of the 43,000 data items in her -- in</p> <p>5 your dataset, you would not be able to determine,</p> <p>6 with any certainty, what the outcome would be; is</p> <p>7 that right?</p> <p>8 A So because Dr. Mayzlin used an LLM, even</p> <p>9 if she were to use the same prompts, again, for</p> <p>10 instance, the outputs would be different because it</p> <p>11 is an LLM that she used. So it's hard for me to say</p> <p>12 if my data was applied within that LLM, what the</p> <p>13 output would be.</p> <p>14 Q But I'm asking about your methodology</p> <p>15 that you applied. If you were to apply your</p> <p>16 methodology to another 43,000 media items that were</p> <p>17 not part of your dataset, would your opinions be the</p> <p>18 same?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: I wouldn't be able to say</p> <p>21 that until I do the actual analysis.</p> <p>22 BY MS. GOVERNSKI:</p> <p>23 Q Okay. So your opinions are solely based</p> <p>24 on these 43,000 social media items?</p> <p>25 MR. FRITZ: Objection.</p>	<p style="text-align: right;">Page 189</p> <p>1 that you are offering in this case?</p> <p>2 A Yes, based on everything that is in the</p> <p>3 report, those are my opinions.</p> <p>4 Q Okay. Are there any opinions that are</p> <p>5 not offered in your report that you are offering in</p> <p>6 this case?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: If new information were to</p> <p>9 come to light or additional information were to come</p> <p>10 to light after the report, then I may have</p> <p>11 additional opinions. But everything that I've</p> <p>12 offered is based on the research that I've done.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q I understand, in the future, you may</p> <p>15 supplement. But I'm trying to just get at a very</p> <p>16 basic question.</p> <p>17 Are there any opinions, as you sit here</p> <p>18 today, that you are offering that you did not</p> <p>19 articulate in your current amended report?</p> <p>20 A No, there are not.</p> <p>21 Q Okay. Thank you. You use the term</p> <p>22 "organic" nearly 90 times in your report. Does it</p> <p>23 mean the same thing every time you use the term?</p> <p>24 A I try to stay consistent with my use of</p> <p>25 "organic," so I would have to confirm each of the</p>

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<p style="text-align: right;">Page 190</p> <p>1 times I've used it. But in general, yes, there 2 should be consistency with the underlying definition 3 of the term. 4 Q Okay. What is the underlying definition 5 of the term "organic"? 6 A So I look at organic as being a -- 7 signatures of non-manipulative traffic usage, 8 et cetera. 9 Q And what does "non-manipulative" mean? 10 A Basic users talking, commenting, liking, 11 upping content across social media platforms. 12 Q Okay. And you use the term -- actually, 13 does the term "organic," is that definition rooted 14 in any academia? 15 A I don't know how it's rooted in academia. 16 It's rooted in practice as a term that is used 17 daily. 18 Q Okay. So as you just defined, organic is 19 based on your own definition of the term? 20 MR. FRITZ: Objection. 21 THE WITNESS: The way that I defined it 22 was based on industry definition of the term. 23 BY MS. GOVERNSKI: 24 Q What industry? 25 A Social media technology.</p>	<p style="text-align: right;">Page 192</p> <p>1 be considered legitimate when it comes to PR, press 2 coverage, because, again, it's things that are taken 3 from interviews with actors, actresses, producers, 4 whomever is involved in the film. There is news 5 coverage by a slew of different media sources, 6 things of that nature. 7 BY MS. GOVERNSKI: 8 Q Okay. And so does it matter what the 9 content of the communication is? If it's solely 10 about marketing, it's legitimate irrespective of 11 what the contents is? 12 A I'm not sure I understand. Are you 13 saying if the content is paid marketing or organic 14 marketing? 15 Q No, let's say -- let's do a hypothetical. 16 Someone says something about the marketing of the 17 film that turned out not to be true. Would that, in 18 your opinion, be considered legitimate because it 19 had to do with marketing even though it was not a 20 truthful statement? 21 A So based on what I understood the 22 question, I wouldn't call that marketing, number 23 one, because that's not the marketing of the film. 24 That would be commentary around it. So it could 25 be -- I don't know -- something happened in the news</p>
<p style="text-align: right;">Page 191</p> <p>1 Q Okay. So what is your basis for stating 2 that social media technology as an industry uses the 3 term "organic" the way that you just described it? 4 A Having worked in technology and social 5 media -- 6 Q Okay. So it's based on -- 7 A -- going to conferences -- sorry. 8 Q No, no. You go. I'm sorry. 9 A Having spoken at industry conferences on 10 the topic, having written a book using that 11 verbiage, yes. 12 Q And your report uses the term "legitimate 13 news cycles." What did -- what did you mean when 14 you use the term "legitimate"? 15 A When I say "legitimate news cycles," I 16 meant news that does not contain misinformation. So 17 there are legitimate news cycles on the -- not the 18 book, excuse me -- the movie launching, that is a 19 legitimate news cycle. The movie exists, the movie 20 launched, and there was news around that movie 21 launch. 22 Q So what about news about how the film was 23 marketed; would that be considered legitimate? 24 MR. FRITZ: Objection. 25 THE WITNESS: So marketing activity would</p>	<p style="text-align: right;">Page 193</p> <p>1 that had nothing to do with the film or the actors, 2 actresses, et cetera. So that, in and of itself, 3 could have legitimate properties or it could have 4 illegitimate properties, depending on where it came 5 from. 6 Q What if an actor was talking about the 7 marketing of the film; would that be legitimate or 8 not legitimate? 9 A If they were talking about the marketing 10 of the film and they were being honest, then I would 11 say yes, that would be legitimate. Alternatively, 12 if they were saying something that was untrue 13 knowingly, it could be misinformation. 14 Q So how do you tell what is legitimate or 15 illegitimate? It sounds a little bit subjective. 16 MR. FRITZ: Objection. 17 THE WITNESS: Well, one way is by simply 18 looking at is this true or is this not true. 19 BY MS. GOVERNSKI: 20 Q And so you would have to do that at a 21 post-by-post analysis? 22 A To look at if something was legitimate as 23 part of a news cycle? 24 Q Uh-huh. 25 A So there would be additional patterns.</p>

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<p style="text-align: right;">Page 194</p> <p>1 Because, again, just because you say something, 2 doesn't mean that it's going to get scale. So if it 3 got scale and it was true, right, there would be 4 other ways to identify, number one, if it's true, 5 and if the origins was an individual saying it, a 6 press release, whatever the case may be, and vice 7 versa. 8 Q Okay. So is there like a scientific way 9 to determine if something is part of a legitimate 10 news cycle or an illegitimate news cycle? 11 A So there is a way to identify 12 misinformation. If you want to identify if 13 something is true regarding a news cycle, usually 14 you look at things of credibility of who 15 disseminated it, you look at confirmation of that 16 dissemination or the story. So in other words, did 17 the New York Times publish it, and then, 18 subsequently, did AP News publish it. So there is a 19 collective mentality of, the assumption is that not 20 every major news outlet would knowingly publish 21 incorrect information. 22 Q Well, what you just described seems like 23 a pretty subjective process. 24 MR. FRITZ: Objection. 25 THE WITNESS: I'm sorry.</p>	<p style="text-align: right;">Page 196</p> <p>1 Strike that. 2 Are you an expert on what is legitimate 3 or not legitimate in terms of news cycles? 4 MR. FRITZ: Objection. 5 THE WITNESS: So I have done work 6 on legitimate and illegitimate around social media 7 in conjunction with news cycles and politics. 8 BY MS. GOVERNSKI: 9 Q Okay. So can you explain how you are an 10 expert in determining whether a news cycle is 11 legitimate or illegitimate? 12 A So I have looked at Discourse across 13 different news cycles. Specifically the one I'm 14 referencing right now is in conjunction with 15 politics. And looking at stories -- or coverage 16 stories that were seeded versus not seeded for 17 different political gains and dissecting if those 18 news stories were true or false and if they were -- 19 how do you say -- if they were manipulative within 20 the context of how they were planted across Meta's 21 network. 22 Q It sounds like a lot of the determination 23 between whether something is legitimate or 24 illegitimate depends on whether the content is true 25 or false; is that right?</p>
<p style="text-align: right;">Page 195</p> <p>1 (Audio interruption.) 2 THE WITNESS: Sorry. Was that a 3 question? 4 BY MS. GOVERNSKI: 5 Q What was that? 6 A You just -- you just -- for some reason 7 you knocked my Google Home. Sorry. 8 Q Okay. Is your Google Home turned on? 9 A My Google Home is always turned on. 10 Everything -- yes, it's turned on. 11 Q Is it providing you feedback on the 12 deposition? 13 A No, it's -- no, it's not. Like, usually, 14 you should have to say -- I won't say it, but 15 usually you have to say the prompt. 16 Q Say the prompt? 17 A Yes. 18 Q Okay. So I'm specifically focused on the 19 words "legitimate" versus "not legitimate." Is 20 there a scientific definition of legitimacy? 21 MR. FRITZ: Objection. 22 THE WITNESS: There may be. I don't know 23 what the scientific definition would be. 24 BY MS. GOVERNSKI: 25 Q Okay. And you don't know -- I'm sorry.</p>	<p style="text-align: right;">Page 197</p> <p>1 MR. FRITZ: Objection. 2 THE WITNESS: It's one factor, but it 3 wouldn't be the only factor. 4 BY MS. GOVERNSKI: 5 Q Well, what are some other factors? 6 A If something is true or false. If 7 something -- sorry. If something had been boosted, 8 for instance. Sorry, I can't think of how else to 9 say that. Increased in its popularity based on 10 manipulation. Also if something is true, but it's 11 contextually positioned. So it's not wrong, but 12 it's contextually positioned as inaccurately. 13 Q And those are all examples of things that 14 are -- news cycles that would be illegitimate, 15 right? 16 A Correct. 17 Q Your first opinion in this case refers to 18 a time frame of August 2024 through February 2025. 19 And that's a six-month period. Is your first 20 opinion limited to that specific time frame? I'm 21 happy to share. 22 A Can you just -- 23 Q Of course. Let me go up to the top so 24 you can see what I'm in. I'm in -- wait, what did 25 we look at? B1? I just want to make sure that</p>

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<p style="text-align: right;">Page 198</p> <p>1 we're oriented that this is your latest report. 2 Here, right? B2, this is your latest report, right? 3 A Yes, number 2, Exhibit 2. 4 Q Yup. Exhibit 2, exactly. So if we can 5 go to paragraph 22. Oh, actually, I want to go to 6 the opinions. 7 Opinion 1 is right here: 8 (As read): 9 "The social media activity surrounding 10 Ms. Lively during August 2024 through 11 February 2025 exhibited patterns 12 consistent with organic public discord 13 driven by legitimate news cycles, film 14 publicity, and entertainment media 15 coverage." 16 Do you see that? 17 A Yes. 18 Q Oh, and you use the term "coordinated 19 manipulation" and "astroturfing." So I would like 20 you to explain those one by one. 21 A So coordinated manipulation is similar to 22 what we talked about before. It can either be 23 through technology or, less frequently, through 24 coordinated human ways of manipulating data. So 25 from a bot perspective, specifically manipulative</p>	<p style="text-align: right;">Page 200</p> <p>1 is done in a coordinated effort either through bots 2 or through human activity. It's a different coined 3 term. 4 Q Okay. And how do you know that the way 5 you define astroturfing is the way that Dr. Mayzlin 6 defines astroturfing? 7 A I believe it's an inference from reading 8 through her report and the contextualization in that 9 report. Also, I understand the general term of 10 astroturfing outside of both of our reports. 11 Q Okay. So opinion 1 says that you looked 12 at social media activity between August 2024 through 13 February 2025. So is this opinion limited to that 14 time period? 15 A This opinion, yes. I looked at larger 16 datasets, but this particular opinion is based on 17 that time frame. 18 Q So that was my next question. Why did 19 you collect from a broader time period but limit 20 this opinion solely to the more narrow time period? 21 A Because I didn't have enough volume of 22 data in order to offer that opinion through the 23 larger frame of time that I was hoping to look at. 24 Q So why didn't you just use Dr. Mayzlin's 25 data?</p>
<p style="text-align: right;">Page 199</p> <p>1 bots, because there are bots that are not 2 manipulative that are used every single day, to 3 also, you know, having a coordinated group of 4 individuals or humans, you know, make something 5 either more positive or more negative based on -- 6 based on coordinated activity. 7 Q Okay. It sounds like that is similar to 8 how you define illegitimate news cycles, film 9 publicity, and entertainment; is that right? That's 10 kind of the opposite of legitimate news cycles, film 11 publicity, and entertainment media coverage? 12 A I believe so. 13 Q Okay. What is "astroturfing"? 14 A Astroturfing, to my understanding, is 15 similar to manipulative behavior. Astroturfing 16 isn't a term that I use normally. 17 Q So why did you use it in your report? 18 A So specifically, I used it because it was 19 used in Dr. Mayzlin's report, so I wanted to use 20 similar terminology. 21 Q Okay. But do you have any independent 22 expertise in astroturfing? 23 A Yes. Astroturfing is a different word, 24 but it's the same underlying behavior of 25 manipulative, legitimate or illegitimate work that</p>	<p style="text-align: right;">Page 201</p> <p>1 A So I couldn't replicate Dr. Mayzlin's 2 data, first of all. 3 And secondly, using someone else's data 4 just point blank without ensuring that, number one, 5 I could reproduce it. Number two, that the data is, 6 you know, accurate of that time period, doesn't 7 really make sense. So I specifically wanted to pull 8 raw data from the social media platforms themselves 9 to analyze. 10 Q So you have no idea -- well, you use the 11 term -- what did you just say? Accurate -- you just 12 used the term "accurate of the time period," is that 13 the term you used? 14 MR. FRITZ: Objection. 15 THE WITNESS: I'm not sure what I just 16 said. I'm not sure if it was accurate or -- number 17 one, her data, it wasn't reproducible based on what 18 I was given. Secondly, it was -- to ensure that the 19 data was -- I'm going to use it in a different way 20 than we used it earlier -- representative of the 21 actual raw data during the time frame. 22 BY MS. GOVERNSKI: 23 Q Okay. So how -- based on the way you 24 just used it, how did you ensure that your data was 25 representative of the actual raw data from the time</p>

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<p style="text-align: right;">Page 202</p> <p>1 period?</p> <p>2 A It was pulled directly from the social</p> <p>3 media platforms, from their raw datasets.</p> <p>4 Q Okay. So you don't know one way or the</p> <p>5 other whether Dr. Mayzlin's data was representative</p> <p>6 of the actual raw data from the time period?</p> <p>7 A There is no way to tell because she used</p> <p>8 an LLM.</p> <p>9 Q Right. So you can't tell one way or the</p> <p>10 other whether her data was representative of the</p> <p>11 time period?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: I cannot tell if her raw</p> <p>14 data is accurate of the time period that she has,</p> <p>15 no.</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q Okay. So when you said there was not</p> <p>18 enough, not sufficient social media activity after</p> <p>19 February 2025, what was that based on?</p> <p>20 A So what I said was, for this particular</p> <p>21 opinion, there wasn't enough volume of data in order</p> <p>22 to derive an insight outside of this time period.</p> <p>23 Q What volume of data would you have</p> <p>24 needed?</p> <p>25 A It would have to be consistent across all</p>	<p style="text-align: right;">Page 204</p> <p>1 replicate the dataset, based on the prompts that she</p> <p>2 gave. I was not able to do that.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q But my question is: Why didn't you just</p> <p>5 run your methodology, your sentiment analysis on her</p> <p>6 dataset to see if you had a valid methodology?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: Well, the methodology</p> <p>9 itself is valid, it's peer-reviewed, it's all</p> <p>10 methodology that you would run in academia, as well</p> <p>11 as in practitioner spheres of doing regression</p> <p>12 analysis, doing sentiment analysis, so my</p> <p>13 methodology is not something that is new form by any</p> <p>14 means.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q But my question is -- if you could please</p> <p>17 just answer my question -- why didn't you run that</p> <p>18 methodology on Dr. Mayzlin's dataset?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: Because I did not -- in</p> <p>21 order to run the methodology on anyone's dataset,</p> <p>22 you'd first have to ensure that the dataset itself</p> <p>23 was, I'm going to say, accurate, or -- or</p> <p>24 representative based on the time frame, which is why</p> <p>25 you try and repeat to make sure that you're able to</p>
<p style="text-align: right;">Page 203</p> <p>1 five of the networks. So there should be an even</p> <p>2 sample across all networks in order to make an</p> <p>3 opinion after this time frame.</p> <p>4 Q Why do you need an even sample across all</p> <p>5 the networks?</p> <p>6 A So it doesn't have to be exactly the</p> <p>7 same, but there has -- it has to be proportional.</p> <p>8 So ideally, I would have had more of two of the</p> <p>9 networks, which I did not just based on</p> <p>10 availability, I guess, through Apify. So I used the</p> <p>11 data that I felt was the most -- the most</p> <p>12 substantive and without making any assumptions on</p> <p>13 smaller datasets.</p> <p>14 Q Okay. But you said there wasn't enough</p> <p>15 volume, so do you have a ballpark of how much volume</p> <p>16 you would need for the period after February 2025?</p> <p>17 A I don't know offhand. It would -- I</p> <p>18 would have to go back and crunch the numbers.</p> <p>19 Q So what I'm confused about is why didn't</p> <p>20 you just accept Dr. Mayzlin's dataset for whatever</p> <p>21 value it has and run your analysis on that?</p> <p>22 MR. FRITZ: Objection.</p> <p>23 THE WITNESS: So I didn't accept it at</p> <p>24 face value, and nor should anyone just accept data</p> <p>25 at face value. What I did was, I first tried to</p>	<p style="text-align: right;">Page 205</p> <p>1 pull the same data. And then if I was able to pull</p> <p>2 the same data, I would have then run the methodology</p> <p>3 on that dataset.</p> <p>4 BY MS. GOVERNSKI:</p> <p>5 Q Okay. So how did you ensure that your</p> <p>6 dataset was representative based on the time frame,</p> <p>7 as you just used those words?</p> <p>8 A I pulled it through Apify, and I made</p> <p>9 sure it was -- all of the keywords that were</p> <p>10 available -- that I plugged in that were available</p> <p>11 during the time frame that I stated in the report,</p> <p>12 and that there was enough data, based on total</p> <p>13 volume, in order to analyze it.</p> <p>14 Q What was the total volume?</p> <p>15 A I would have to -- I would have to look</p> <p>16 at the report, but it was 44,000 unique records.</p> <p>17 Q So how did you know that 44,000</p> <p>18 represented the universe of what you've called</p> <p>19 accurate information from the time period?</p> <p>20 MR. FRITZ: Objection.</p> <p>21 THE WITNESS: Because it's pulled from</p> <p>22 the raw data across all five of those platforms.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q So it's your testimony that there were</p> <p>25 only 44,000 social media items between January 2024</p>

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<p style="text-align: right;">Page 206</p> <p>1 and October 2025?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 THE WITNESS: The dataset that I provided</p> <p>4 is what came back from the data scrapes, and there</p> <p>5 is a myriad of different reasons for why the</p> <p>6 datasets could be different if you pulled it with</p> <p>7 additional keywords. For the keywords I used, so</p> <p>8 for the parameters, the query I put in and the time</p> <p>9 frame I put in, those were the ones that were</p> <p>10 available through Apify across the time frame.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q Okay. Let's talk about what you did with</p> <p>13 Apify. Give me one second. Let me stop sharing my</p> <p>14 screen.</p> <p>15 How did you come up with the search terms</p> <p>16 that you used?</p> <p>17 A I used terms that were relevant for Blake</p> <p>18 Lively and It Ends with Us and the movie title.</p> <p>19 Q How did you determine what terms were</p> <p>20 relevant?</p> <p>21 A I used terms that were general enough,</p> <p>22 but that I saw had a good amount of volume across</p> <p>23 Apify.</p> <p>24 Q Have you -- so okay. So for Reddit --</p> <p>25 actually, one second. So tell me how you selected</p>	<p style="text-align: right;">Page 208</p> <p>1 only, say, Instagram scraper that Apify provides?</p> <p>2 A It's the only one that was available to</p> <p>3 select, yes.</p> <p>4 Q Did you personally go to Apify to see if</p> <p>5 this was the only Instagram scraper?</p> <p>6 A I logged into Apify, yes. So I didn't</p> <p>7 validate Instagram specifically, but I logged in in</p> <p>8 order to see the options.</p> <p>9 Q Well, I'm asking specifically with</p> <p>10 Instagram. Did you personally verify that this is</p> <p>11 the only scraper for Instagram?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: I verified the interface of</p> <p>14 Apify, and that, for Instagram, this is the scraper</p> <p>15 that was available to use. However, the scraper</p> <p>16 itself is scraping the API, which is the raw dataset</p> <p>17 on Instagram. So even if there are two scrapers,</p> <p>18 which there wasn't available, you're still scraping</p> <p>19 the raw dataset.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Okay. You separated your -- your opinion</p> <p>22 into different time periods. I want to focus on</p> <p>23 your baseline time period. Your baseline time</p> <p>24 period was May to July 2024, right?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 207</p> <p>1 which specific scrapers to use. If we go --</p> <p>2 actually, let's do it this way.</p> <p>3 If you go to page 110 of your report, you</p> <p>4 list five specific data sources and tools. My</p> <p>5 question is whether what you list here reflects the</p> <p>6 universe of the scrapers that you used?</p> <p>7 A So sorry. Let me go to page 110, you</p> <p>8 said?</p> <p>9 Q Uh-huh.</p> <p>10 A There is -- Exhibit 2, there's only 109</p> <p>11 pages.</p> <p>12 Q Oh, 109. Sorry. That changed. See</p> <p>13 where it says "Data Sources and Tools"?</p> <p>14 A Yes.</p> <p>15 Q Okay. So is this the universe of the</p> <p>16 scrapers that you used?</p> <p>17 A Yes.</p> <p>18 Q And how did you decide which scrapers to</p> <p>19 use?</p> <p>20 A So those were the scrapers for the</p> <p>21 particular social media platforms. So first, I</p> <p>22 decided which social media platforms I wanted to</p> <p>23 scrape. And after that, I selected the scrapers</p> <p>24 that were available through the API on Apify.</p> <p>25 Q So is it your testimony that this is the</p>	<p style="text-align: right;">Page 209</p> <p>1 Q And so if I refer to "baseline," you'll</p> <p>2 understand I'm talking about that baseline?</p> <p>3 A Yes.</p> <p>4 Q Okay. And then when I refer to --</p> <p>5 actually, let's go -- let's look at your report,</p> <p>6 Exhibit 2, and let's go to paragraph 32, which is on</p> <p>7 page 17, I think.</p> <p>8 A I'm sorry, could you repeat the number?</p> <p>9 Q Yeah, 42. I'm looking at 42 right</p> <p>10 here -- oh, no, I want to go to 32.</p> <p>11 You see paragraph 32 --</p> <p>12 A Yes.</p> <p>13 Q -- that says:</p> <p>14 (As read):</p> <p>15 "The meta-analysis combined data from</p> <p>16 all 43,992 social media items."</p> <p>17 You use the term "August 2024 spike."</p> <p>18 What did you mean by that?</p> <p>19 A That's the spike that you see in one of</p> <p>20 the charts, for instance. It means that we saw</p> <p>21 total volume of sentiment for that particular month</p> <p>22 increase with a statistical significance.</p> <p>23 Q Okay. So you mentioned statistical</p> <p>24 significance, and there is a 1,096 standard</p> <p>25 deviation. What does that mean?</p>

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<p style="text-align: right;">Page 210</p> <p>1 A So it is outside of the -- outside of the</p> <p>2 normal baseline amount.</p> <p>3 Q What does specifically the 1,096 standard</p> <p>4 deviation mean?</p> <p>5 A So I'm looking at the 1,191 items per</p> <p>6 month, and that means it's extraordinary --</p> <p>7 extraordinarily statistically significant.</p> <p>8 Q So what specific data points did you use</p> <p>9 to determine that?</p> <p>10 A I'm sorry?</p> <p>11 Q What specific data points did you use to</p> <p>12 determine the standard deviation?</p> <p>13 A So I looked at the baseline period, which</p> <p>14 we already talked about, and the overall activity</p> <p>15 across all of the platforms combined.</p> <p>16 Q Okay. And did you use monthly or daily</p> <p>17 data for those three months?</p> <p>18 A That's monthly data.</p> <p>19 Q So why did you use monthly data?</p> <p>20 A Monthly data looks at things like the</p> <p>21 de-dupes. It looks at smoothing out. It removes</p> <p>22 usually oddities that come in on a daily basis.</p> <p>23 It's -- it normally is smoother and cleaner data</p> <p>24 than looking at a daily.</p> <p>25 Q What if, though, you -- the daily</p>	<p style="text-align: right;">Page 212</p> <p>1 close to the number indicative that the underlying</p> <p>2 data is variable?</p> <p>3 A I'm sorry. Can you repeat that?</p> <p>4 Q Isn't a standard deviation this high and</p> <p>5 this close to the total number of items indicative</p> <p>6 of variable data?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: No would be my answer.</p> <p>9 It's indicative that there is a very high -- a very</p> <p>10 high -- I'm trying not to use word "deviation."</p> <p>11 There's a very high variance between the baseline</p> <p>12 and the output of the data.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q So what does that mean because we're</p> <p>15 trying to look at the baseline?</p> <p>16 A Right. In this case, it's showing that</p> <p>17 the baseline is -- it's showing that the baseline is</p> <p>18 higher for these particular terms than, for</p> <p>19 instance, some other celebrity terms that you may</p> <p>20 identify. So in general, Lively starts at a higher</p> <p>21 baseline when compared to, arguably, other</p> <p>22 celebrities, actors, actresses.</p> <p>23 Q But you didn't disclose baselines for</p> <p>24 other actors or actresses?</p> <p>25 A No, I didn't --</p>
<p style="text-align: right;">Page 211</p> <p>1 aberrations were important?</p> <p>2 A So daily wouldn't make a statistical</p> <p>3 significance looking at it daily or monthly because</p> <p>4 the monthly is still just looking at an average of</p> <p>5 the dailies. So you're not going to get massive</p> <p>6 skews one way or the other going from daily or</p> <p>7 monthly.</p> <p>8 Q Did you try it?</p> <p>9 A I didn't need to because I -- I know that</p> <p>10 looking at daily and looking at monthly, the same</p> <p>11 argument could be made why didn't I look at it</p> <p>12 yearly or quarterly. There is smoothing of the</p> <p>13 overall data by looking at it on a monthly -- a</p> <p>14 monthly basis versus the daily.</p> <p>15 Q So if you were only looking at three</p> <p>16 months, May, June and July, you had three data</p> <p>17 points that went into this analysis?</p> <p>18 A I had three months that went into it.</p> <p>19 Q Right. So that's three data points that</p> <p>20 you entered in order to reach your conclusion,</p> <p>21 right? A data point from each month, an average</p> <p>22 from each month?</p> <p>23 A It's an aggregate that rolls up into a</p> <p>24 monthly data point.</p> <p>25 Q And so isn't a standard deviation so</p>	<p style="text-align: right;">Page 213</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: -- because I didn't need to</p> <p>3 -- oh, sorry. Oh, I thought Kevin said something.</p> <p>4 MR. FRITZ: I did. I just noted my</p> <p>5 objection.</p> <p>6 You can answer.</p> <p>7 THE WITNESS: Because I didn't need to.</p> <p>8 That's, again, based on my knowledge of actually</p> <p>9 working with celebrities across social media and</p> <p>10 tracking individuals, whether they are brands or</p> <p>11 people.</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q How many times have you run a standard</p> <p>14 deviation before?</p> <p>15 A How many times have I done the</p> <p>16 calculation? Numerous.</p> <p>17 Q In the course of your career, how many</p> <p>18 times?</p> <p>19 A Over 25 years, I can't give you a number.</p> <p>20 Q Is it part of your day-to-day work?</p> <p>21 A It was part of my prior day-to-day work,</p> <p>22 yes.</p> <p>23 Q Prior, meaning at Meta?</p> <p>24 A At Meta, Ipsos, at Nielsen, which are all</p> <p>25 market research companies. And, again, market</p>

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<p style="text-align: right;">Page 214</p> <p>1 research, standard deviation is a key element of 2 doing massive research initiatives. 3 Q And when you analyzed August 2024, you 4 described that as "a spike." Why did you use those 5 words -- or that word, sorry, "spike"? 6 A I used that word because you have to look 7 at a larger set of data across multiples months. 8 And if something goes up dramatically, I would call 9 that a spike. 10 Q In fact, you've used the word 11 "extraordinary" to describe the August 2024 spike, 12 right? 13 A I'm not sure if that's the actual word I 14 used, but I will say yes, this was a significant 15 spike. 16 Q Okay. Well, let's go to opinion 2 of 17 your report, which is in paragraph 169. 18 A Yes. 19 Q Okay. And if you can look at opinion 2, 20 you say: 21 (As read): 22 "The 4.9 statistical deviation, while 23 extraordinarily, reflects organic 24 news-driven interest rather than 25 manipulated [sic] manipulation."</p>	<p style="text-align: right;">Page 216</p> <p>1 irregularity. 2 Q Okay. And we talked about the five 3 platforms that you looked at: Twitter, YouTube, 4 Instagram, Reddit, and TikTok. How did you pick 5 those five platforms? 6 A They are the five major social media 7 platforms across the U.S. 8 Q Did you do any research to determine 9 whether there are any allegations that the 10 defendants specifically used those five platforms? 11 A No. 12 Q So if it turns out that the defendants 13 only used, say, one of these platforms, how would 14 your analysis change? 15 A I'm sorry. Just repeat that once more. 16 Q If it turns out that the defendants only 17 used one of these platforms, how would your analysis 18 change? 19 A My analysis wouldn't change based on that 20 assumption. 21 Q Why not? 22 A So what I did was analyze real-life data. 23 So I looked at five different sites specifically to 24 detect any patterns because in order to have 25 something be manipulative, there needs to be scale</p>
<p style="text-align: right;">Page 215</p> <p>1 Do you see that? 2 A I do see that. 3 Q Okay. So what were you describing as 4 extraordinary there? 5 A The fact that it is an extreme spike. 6 Q Okay. So you would describe the spike as 7 extraordinary? 8 MR. FRITZ: Objection. 9 THE WITNESS: Yes, that's how I used the 10 term there. 11 BY MS. GOVERNSKI: 12 Q Okay. And what are "temporal patterns"? 13 A So temporal patterns could be a myriad of 14 different things. But basically, it's looking at 15 the overall volume of something in order to 16 understand if there is an observable irregularity. 17 Q Okay. Are timing signatures the same 18 thing as temporal patterns? 19 A Timing signatures offer inputs into 20 temporal -- sorry, that offers inputs into temporal 21 patterns. If something occurs, like, over time as 22 part of a norm, then something that would be an 23 irregularity around timing would be everyone else, 24 let's say, in a city posts around this time. So we 25 see spikes outside of this time frame, which is an</p>	<p style="text-align: right;">Page 217</p> <p>1 as one form factor, especially for social media. So 2 looking at five different platforms instead of two 3 or three, gives additional contextualization to 4 understand if there is any oddities that we see in 5 one network, two networks, three networks. Looking 6 across five allows us just better analysis. 7 Q Okay. You reviewed 2,039 items on 8 Twitter, 16,000 items on YouTube, 6,000 on 9 Instagram, 879 on Reddit, and 688 on TikTok; is that 10 right? 11 A I believe those numbers are correct, yes. 12 Q Okay. So what if the only smear campaign 13 were on Reddit and TikTok? 14 MR. FRITZ: Objection. 15 BY MS. GOVERNSKI: 16 Q How would your analysis be the same when 17 you are including so many more items from the other 18 platforms? 19 A So sorry. I had to think about what you 20 were asking. So if I'm looking at several different 21 platforms, I analyze those platforms first 22 individually and then part of the collective. So 23 that's why I provide a meta-analysis as well as an 24 individual analysis across each of the platforms. 25 So if something was an oddity across one or two</p>

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<p style="text-align: right;">Page 218</p> <p>1 platforms, then that would come up in the data 2 itself that was analyzed. 3 Q Okay. So you use the term 4 "meta-analysis." What does that term mean? 5 A It's an aggregate across all the 6 platforms. 7 Q Okay. And who -- is that a term of art 8 in your industry? 9 A Is it a term of -- I'm sorry? 10 Q A term of art. Does it mean something 11 specific in your industry? 12 A Meta-analysis usually just means it's a 13 high-level analysis across whatever you're looking 14 at, examining. 15 Q So across what in particular? 16 A In this case, it's across five platforms. 17 Q Okay. And when you described earlier 18 that your methodology was sound and rooted in 19 academia, is that a meta-analysis that you were 20 talking about? 21 A So yes, looking at an aggregate is done 22 in academia as well as in practitioner -- in 23 practice. So you look at different social media 24 networks individually. And then in order to do a 25 larger analysis at the aggregate scale, you would</p>	<p style="text-align: right;">Page 220</p> <p>1 sorry. I'm back. 2 If you look at the screen, in the -- it 3 discusses the definition of "meta-analysis." 4 Do you see that? 5 A I do. From Karl Pearson, yes. 6 Q Yup, and it says Gene Glass coined the 7 term in 1976. 8 Do you see that? 9 A Yes. 10 Q So when you use the term "meta-analysis," 11 is this the meta-analysis that you're talking about? 12 MR. FRITZ: Objection. 13 THE WITNESS: So let me see how they're 14 describing it here, but several independent studies 15 considered to be combinable -- yes. At a high 16 level, this would be the definition. So looking at 17 doing different analysis and having them be able to 18 be aggregated. 19 BY MS. GOVERNSKI: 20 Q Okay. But what you just read said, "a 21 meta-analysis is a statistical method that 22 integrates the results of several independent 23 studies considered to be combinable." 24 So what independent studies analyzing 25 whether there was a coordinated campaign did you</p>
<p style="text-align: right;">Page 219</p> <p>1 then -- and maybe folks would call it different 2 things, but it's called meta-analysis most of the 3 time that I've interacted with it, whether, again, 4 in academia or as a practitioner. 5 Q Are you -- do you know who Professor Gene 6 Glass is? 7 A I don't think so. 8 Q Have you ever heard of Professor Gene 9 Glass? 10 MR. FRITZ: Objection. 11 THE WITNESS: The name sounds familiar, 12 but I don't know. It's not something that comes to 13 mind, no. 14 MS. GOVERNSKI: Okay. My colleague will 15 mark what will be Exhibit 7? Am I up to 7? 16 THE STENOGRAPHIC REPORTER: Yes, you are. 17 Exhibit 7. 18 (Exhibit 7 marked for identification.) 19 MS. GOVERNSKI: Let me know when it's in 20 there, and then we'll share it on the screen. 21 THE WITNESS: I downloaded it. 22 BY MS. GOVERNSKI: 23 Q Okay. Great. Oh, my gosh, my computer 24 just turned off. Okay. If you can look at -- I'm 25 sorry. I'm having some technical issues. I'm</p>	<p style="text-align: right;">Page 221</p> <p>1 integrate? 2 A So that specific definition I'm assuming 3 in 1976 when it was coined probably meant a very 4 specific thing. The way that Meta analysis are used 5 currently, literally from I would say 2022 up until 6 the present, is looking at individual analysis of 7 social media sites such as Instagram as a silo; 8 Facebook as a silo; Reddit as a silo. 9 And then using the same time period, the 10 exact same parameters or queries that you use would 11 be classified as the individual studies. And being 12 able to roll that up would be the meta-analysis in 13 aggregate. 14 Q Okay. Well, but this is from the 15 Encyclopedia of Research Design, and you can see I 16 pulled it on December 9th. It's not purporting to 17 define the term then. 18 Are you saying that this is not the way 19 that meta-analysis is defined in the research world? 20 MR. FRITZ: Objection. 21 THE WITNESS: In the research world, we 22 use it in the way that I just defined it. Or the 23 way that -- 24 BY MS. GOVERNSKI: 25 Q Okay.</p>

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<p style="text-align: right;">Page 222</p> <p>1 A Yeah.</p> <p>2 Q What authorities do you have for the way</p> <p>3 that you define meta-analysis?</p> <p>4 A We've used it at Ipsos. We've used it at</p> <p>5 Nielson. And this is not just in the U.S. but</p> <p>6 global studies in the U.S., China, parts of Asia for</p> <p>7 doing individual analysis across social media sites.</p> <p>8 And then looking at making sure that certain</p> <p>9 variables hold true. Which are things like the</p> <p>10 keywords or the parameters or the queries. Looking</p> <p>11 at the exact same time frame, and aggregating and</p> <p>12 doing an overall -- a roll-up analysis.</p> <p>13 Q I see. So as you used the term</p> <p>14 "meta-analysis," it's based on what you've done in</p> <p>15 your career?</p> <p>16 MR. FRITZ: Objection.</p> <p>17 THE WITNESS: Yes.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q But it's a different definition than in</p> <p>20 this encyclopedia that I showed you?</p> <p>21 A I would argue that it's not different.</p> <p>22 Some of the individual verbiage may be different,</p> <p>23 because it says "study."</p> <p>24 So I would argue that a study of</p> <p>25 Instagram, a study of Facebook, a study of Reddit</p>	<p style="text-align: right;">Page 224</p> <p>1 72 hours), proportional distribution</p> <p>2 stability, and identical decay</p> <p>3 patterns."</p> <p>4 This is paragraph 169.</p> <p>5 When opinion 5 refers to a meta-analysis,</p> <p>6 that's describing the analysis you just described</p> <p>7 which looks at your dataset, right?</p> <p>8 A I'm sorry. I found it. Can you just</p> <p>9 repeat the question again?</p> <p>10 Q Sure. When opinion number 5 refers to a</p> <p>11 meta-analysis, you're describing the analysis we</p> <p>12 just discussed which was your analysis of your</p> <p>13 dataset, right?</p> <p>14 A That is correct.</p> <p>15 Q Okay. And when I refer to your dataset,</p> <p>16 that's the 42,992 items, right?</p> <p>17 A Yes. The complete dataset that I</p> <p>18 submitted. Yes.</p> <p>19 Q When I refer to your dataset, you'll</p> <p>20 understand that I'm referring to that universe, that</p> <p>21 42,995 so I don't have to keep repeating that?</p> <p>22 A Yes.</p> <p>23 Q Okay. So you opined that your dataset</p> <p>24 showed:</p> <p>25 (As read):</p>
<p style="text-align: right;">Page 223</p> <p>1 would be exactly similar to what they're talking</p> <p>2 about here.</p> <p>3 Q But the study was just data from each of</p> <p>4 those, right?</p> <p>5 A That is a quantitative study.</p> <p>6 Q Okay. So it's your testimony that a</p> <p>7 meta-analysis also -- strike that.</p> <p>8 It's your testimony that when the</p> <p>9 definition of meta-analysis here refers to studies,</p> <p>10 it also means the combination of different datasets?</p> <p>11 A I agree with the fact that it says</p> <p>12 individual studies and those could be qualitative or</p> <p>13 quantitative. And then it talks about the</p> <p>14 combining, or being combinable.</p> <p>15 Q Okay. And when you talk about your</p> <p>16 definition of meta-analysis, can you provide me with</p> <p>17 any academic citation that supports that definition?</p> <p>18 A Offhand, no. Not readily available.</p> <p>19 Q Okay. Let's go to opinion 5 in your</p> <p>20 report. My colleague will share that again. Where</p> <p>21 you have opinion 5. And you say:</p> <p>22 (As read):</p> <p>23 "Cross-platform meta-analysis confirmed</p> <p>24 synchronous timing across all five</p> <p>25 platforms (peak activity within 48 to</p>	<p style="text-align: right;">Page 225</p> <p>1 "Synchronous timing across all five</p> <p>2 platforms based on peak activity within</p> <p>3 48 to 72 hours."</p> <p>4 What does "synchronous timing" means?</p> <p>5 A So it was timing that was -- that was on</p> <p>6 par -- sorry. If you look at like a bell curve,</p> <p>7 right, thinking of synchronous of the center of the</p> <p>8 bell curve. So it was where most of the activity</p> <p>9 took place. Which was in the normal -- sorry, I</p> <p>10 shouldn't say normal. In the on-average hours of</p> <p>11 when posting takes place for that particular time</p> <p>12 zone.</p> <p>13 Q So the synchronous timing didn't refer to</p> <p>14 the time period of 48 to 72 hours?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: So for UTC, which is how I</p> <p>17 do the data stamp, it looks at a specific period of</p> <p>18 time, when the posts were posted. And there is</p> <p>19 usually a 48 to 72 hour time frame for any oddities</p> <p>20 for when the reporting -- sorry -- when the data in</p> <p>21 the dataset ensures that it's available.</p> <p>22 So usually when I do the analysis, I</p> <p>23 would look at a 48 to 72 hour time frame to make</p> <p>24 sure that there is no outliers.</p> <p>25</p>

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<p style="text-align: right;">Page 226</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Okay. And so you consider anything</p> <p>3 posted within 48 to 72 hours to be synchronous?</p> <p>4 A As part of this analysis, yes.</p> <p>5 Q What about other analyses?</p> <p>6 A Within the context of this analysis for</p> <p>7 social media, then yes.</p> <p>8 Q So in any analysis of social media, 48 to</p> <p>9 72 hours is considered synchronous?</p> <p>10 A I can only talk about this particular</p> <p>11 analysis within these confines. There is a myriad</p> <p>12 of different social media analysis and different</p> <p>13 ways of looking at things. But in this context,</p> <p>14 yes.</p> <p>15 Q Okay. But so you could define</p> <p>16 synchronous in different ways depending on what</p> <p>17 you're looking at?</p> <p>18 MR. FRITZ: Objection.</p> <p>19 THE WITNESS: Depending on the domain and</p> <p>20 what you're trying to analyze. Yes.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q So there is not like a standard</p> <p>23 definition of what it means to be synchronous?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: I believe there's -- in</p>	<p style="text-align: right;">Page 228</p> <p>1 first person I would ask. Yes.</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q So if I wanted to find literature to</p> <p>4 support that 48 to 72 hours was synchronous, where</p> <p>5 could I look?</p> <p>6 MR. FRITZ: Objection.</p> <p>7 THE WITNESS: I don't know.</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q I just have to ask you?</p> <p>10 A In this context?</p> <p>11 MR. FRITZ: Objection.</p> <p>12 THE WITNESS: If I'm the expert, then</p> <p>13 yes.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q Let's go to paragraph 97. Where the</p> <p>16 report explains that the three-day period was</p> <p>17 between August 6th and 9th.</p> <p>18 How did you pick those dates?</p> <p>19 A What paragraph?</p> <p>20 Q Paragraph 97. You can go to -- keep</p> <p>21 going down, Autumn.</p> <p>22 A My paragraph 97?</p> <p>23 Q Sorry. Let's go to paragraph 36. It's</p> <p>24 miscited in my outline. Paragraph 36 says:</p> <p>25 (As read):</p>
<p style="text-align: right;">Page 227</p> <p>1 context, it is standard. So within this context, I</p> <p>2 do believe there is a standard definition.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q I don't understand how there is a</p> <p>5 standard definition, but only in this context.</p> <p>6 Can you explain that?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: If we were talking about</p> <p>9 social media data in the medical field or in</p> <p>10 finance, there is arguably -- and that's outside of</p> <p>11 my purview. There's arguably different ways of</p> <p>12 looking at synchronization, the same way as I know</p> <p>13 there is different ways of looking at forensics and</p> <p>14 tracking in those domains.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q So if I wanted to know which domain, how</p> <p>17 different domains define synchronous, where would I</p> <p>18 look?</p> <p>19 A I don't know. You would have to be a</p> <p>20 subject matter expert, assumingly, in that domain.</p> <p>21 Q Got it. So only an expert could</p> <p>22 determine what synchronous means in any given</p> <p>23 context?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: An expert would be the</p>	<p style="text-align: right;">Page 229</p> <p>1 "All five platforms exhibit virtually</p> <p>2 simultaneous activity surges between</p> <p>3 August 6th and 9th."</p> <p>4 Is that right?</p> <p>5 A Yes.</p> <p>6 Q You described this two to three-day</p> <p>7 period as "tight temporal synchronization", right?</p> <p>8 A I did.</p> <p>9 Q That's based on the definition that you</p> <p>10 just provided from your experience?</p> <p>11 A Yes.</p> <p>12 Q Okay. And if we look at -- go up to</p> <p>13 paragraph 33, just a couple paragraphs above this,</p> <p>14 where you state that:</p> <p>15 (As read):</p> <p>16 "Analysis of posting activity in August</p> <p>17 of 2024..."</p> <p>18 And you explain some of the data. And</p> <p>19 you say:</p> <p>20 (As read):</p> <p>21 "This increase was so unusual that,</p> <p>22 statistically speaking, it would occur</p> <p>23 by chance less than once if you</p> <p>24 observed 100,000 random pieces of</p> <p>25 data."</p>

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<p style="text-align: right;">Page 230</p> <p>1 Is that accurate?</p> <p>2 A Yes.</p> <p>3 Q Okay. And then the next paragraph says</p> <p>4 that:</p> <p>5 (As read):</p> <p>6 "The August 2024 posting represents an</p> <p>7 exceptional departure from typical</p> <p>8 patterns."</p> <p>9 Is that your testimony?</p> <p>10 A Yes. I should probably have caveated it</p> <p>11 for social media. But yes.</p> <p>12 Q Okay. And it's your opinion that the</p> <p>13 August 2024 spike was, quote:</p> <p>14 (As read):</p> <p>15 "Not a random fluctuation, but rather</p> <p>16 an extraordinary event requiring</p> <p>17 explanation."</p> <p>18 Right? That's your opinion?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: Yes, it is.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q So why does the August 2024 spike require</p> <p>23 explanation?</p> <p>24 A I would say it requires explanation</p> <p>25 because one would wonder what caused the spike. So</p>	<p style="text-align: right;">Page 232</p> <p>1 simultaneously, coinciding with the</p> <p>2 film's release date, suggests a</p> <p>3 connection between these events.</p> <p>4 However, while the statistics confirm</p> <p>5 something significant happened in</p> <p>6 August 2024, additional analysis would</p> <p>7 be needed to definitively establish</p> <p>8 that the film caused this increase</p> <p>9 rather than simply occurring at the</p> <p>10 same time."</p> <p>11 So does that paragraph that I just read</p> <p>12 outloud accurately summarize your opinion?</p> <p>13 MR. FRITZ: Objection.</p> <p>14 THE WITNESS: I'm sorry. Can you just</p> <p>15 tell me what paragraph you're on?</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q Yup. Paragraph 34. It's right on the</p> <p>18 screen, "the fact that this spike occurred across</p> <p>19 multiple platforms". Right there.</p> <p>20 A Yes.</p> <p>21 Q So that -- those sentences, "the fact</p> <p>22 that" ending in "at the same time," accurately</p> <p>23 summarizes your opinion?</p> <p>24 A Yes.</p> <p>25 MR. FRITZ: Objection.</p>
<p style="text-align: right;">Page 231</p> <p>1 you look at data points around that time period</p> <p>2 specifically in order to ideally explain what caused</p> <p>3 it.</p> <p>4 Q Okay. Let's look at the next paragraph.</p> <p>5 You say:</p> <p>6 (As read):</p> <p>7 "The August 2024 posting activity</p> <p>8 represents an exceptional departure</p> <p>9 from typical patterns."</p> <p>10 And then could you please go down,</p> <p>11 Autumn. And you say:</p> <p>12 "The fact that this spike occurred</p> <p>13 across multiple platforms</p> <p>14 simultaneously."</p> <p>15 So when you use the term "simultaneously"</p> <p>16 does that mean the same thing as that 48 to 72 hour</p> <p>17 window that we talked about earlier?</p> <p>18 A Yes. From -- sorry -- 48 to 72 hours</p> <p>19 from -- sorry, August. I don't have the date in</p> <p>20 front of me. But yes.</p> <p>21 Q Okay. So you use the term "simultaneous"</p> <p>22 which also could just mean synchronous. Okay.</p> <p>23 (As read):</p> <p>24 "The fact that this spike occurred</p> <p>25 across multiple platforms</p>	<p style="text-align: right;">Page 233</p> <p>1 THE WITNESS: What I put in the report</p> <p>2 does.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Okay. So you have not definitively</p> <p>5 established whether the film's release is what</p> <p>6 caused the August 2024 spike, right?</p> <p>7 A Definitely, no.</p> <p>8 Q Well, you used the word "definitively,"</p> <p>9 right?</p> <p>10 A Right. So I just wanted to answer it in</p> <p>11 that same context. So definitively, no.</p> <p>12 Q You would need additional analysis in</p> <p>13 order to make a definitive conclusion, right?</p> <p>14 A Having a definitive conclusion would be,</p> <p>15 number one, very difficult. Even if I had a</p> <p>16 forensics background. So that's why I say</p> <p>17 definitive is usually not something that you would</p> <p>18 get even from a sophisticated data analysis or</p> <p>19 computational science analysis. Because there are</p> <p>20 so many additional events that are unknown-unknowns</p> <p>21 that you would have to take into account.</p> <p>22 So based on what is -- what is</p> <p>23 accessible, which is news cycles, which is public</p> <p>24 commentary, public information, I was able to</p> <p>25 associate the spike with the news cycle -- excuse</p>

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<p style="text-align: right;">Page 234</p> <p>1 me -- the launch of the film itself.</p> <p>2 Q But you chose to use these words, that an</p> <p>3 additional analysis would be needed to definitively</p> <p>4 establish that the film release caused this increase</p> <p>5 rather than simply occurring at the same time.</p> <p>6 MR. FRITZ: Objection.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Right?</p> <p>9 A Definitely, yes, that is correct.</p> <p>10 Q And you did not perform that additional</p> <p>11 analysis that would be needed to definitively</p> <p>12 establish that the film release caused this increase</p> <p>13 rather than simply occurring at the same time,</p> <p>14 right?</p> <p>15 A I did not do an analysis of correlation</p> <p>16 to definitively prove it was in -- the spike was the</p> <p>17 outcome of the film launch.</p> <p>18 Q What does "correlation" mean?</p> <p>19 A Correlation means that there is a</p> <p>20 connection between what happened and the outcome.</p> <p>21 Q Okay. And is that different from</p> <p>22 causation?</p> <p>23 MR. FRITZ: Objection.</p> <p>24 THE WITNESS: So correlation and</p> <p>25 causation are different.</p>	<p style="text-align: right;">Page 236</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q What if you determined that you were</p> <p>3 missing a set of data from May, June, and July, how</p> <p>4 would that change your proportional analysis?</p> <p>5 A So the reason I chose to analyze data</p> <p>6 across five platforms was to mitigate any issues</p> <p>7 with not having sampling from the key social media</p> <p>8 sites that are used globally but specifically in the</p> <p>9 U.S.</p> <p>10 Q Okay. But my question is, if it turns</p> <p>11 out that the few hundred posts that you had from</p> <p>12 TikTok, the 688 posts from TikTok were just the ones</p> <p>13 you happened to capture, but really there were</p> <p>14 20,000 items on TikTok, wouldn't that end up</p> <p>15 changing your proportion for your subsequent</p> <p>16 analysis?</p> <p>17 A So I would have to look at the data in</p> <p>18 order to know that. Because, again, I'm scraping</p> <p>19 the public posts that are available. Because</p> <p>20 private posts, obviously, are not available as part</p> <p>21 of the API.</p> <p>22 So I would have to look to see if</p> <p>23 additional data, again with the same parameters,</p> <p>24 with the same time frame, if there would be any</p> <p>25 difference. But on average, because I'm looking at</p>
<p style="text-align: right;">Page 235</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q So you don't perform a causation</p> <p>3 analysis, right?</p> <p>4 A I did not. Not in this instance, no.</p> <p>5 Q Okay. Let's turn to paragraph 37. Which</p> <p>6 I think should be the next paragraph. You see</p> <p>7 paragraph 37 where it talks about Proportional</p> <p>8 Platform Distribution?</p> <p>9 Do you see that?</p> <p>10 A I do.</p> <p>11 Q It says:</p> <p>12 (As read):</p> <p>13 "The distribution of activity across</p> <p>14 the platforms during August 2024</p> <p>15 closely matched baseline proportions."</p> <p>16 What do you mean when you say "baseline</p> <p>17 proportions"?</p> <p>18 A So the baseline that we established and</p> <p>19 discussed earlier. Which was May, June, July.</p> <p>20 Q What if your May, June, July dataset was</p> <p>21 incomplete? How would the proportional analysis</p> <p>22 change?</p> <p>23 MR. FRITZ: Objection.</p> <p>24 THE WITNESS: I'm not sure what you mean</p> <p>25 by "incomplete."</p>	<p style="text-align: right;">Page 237</p> <p>1 not just one site but five different sites, this</p> <p>2 should mitigate any issues or I should be able to</p> <p>3 capture if there is any issue in a particular social</p> <p>4 media site having odd spikes or things of that</p> <p>5 nature.</p> <p>6 Q But you're analyzing a proportion based</p> <p>7 on the proportion that existed during the baseline</p> <p>8 period, right?</p> <p>9 A Based on a dataset during that time</p> <p>10 period, yes.</p> <p>11 Q My question is, if your dataset was not</p> <p>12 complete, if it missed certain posts from certain</p> <p>13 activities, wouldn't your proportion change?</p> <p>14 A So the net new dataset that you're</p> <p>15 hypothetically talking about would have to</p> <p>16 completely skew completely differently than the</p> <p>17 dataset that I was able to pull based on the raw</p> <p>18 data on that platform. So the chances of that is</p> <p>19 relatively small.</p> <p>20 Q But I'm not asking you the chances of it.</p> <p>21 I'm asking you, if it turns out that say the scraper</p> <p>22 you used for TikTok turned out not to scrape</p> <p>23 everything, and that really there was a different</p> <p>24 universe of TikTok posts that you did not capture,</p> <p>25 wouldn't that alter the proportion that you were</p>

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<p style="text-align: right;">Page 238</p> <p>1 using for your future analyses?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q I don't think this should be all that</p> <p>5 complicated. Like if a dataset for TikTok</p> <p>6 increases, wouldn't that change your</p> <p>7 proportionality?</p> <p>8 MR. FRITZ: Objection.</p> <p>9 THE WITNESS: To answer your question,</p> <p>10 the dataset would have to be completely different</p> <p>11 than the dataset that I pulled. And directionally,</p> <p>12 that wouldn't make sense. Because, again, it's a</p> <p>13 randomized pull based on those keywords.</p> <p>14 So you're getting a sampling of the</p> <p>15 parameters that I've selected, the keywords, and</p> <p>16 it's a random sample of the raw data that's</p> <p>17 reflective of that. So you shouldn't get -- with</p> <p>18 the same time frame, with the same keywords, you</p> <p>19 shouldn't have completely different raw data that</p> <p>20 wasn't represented in the initial pull.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q So I'm asking in the hypothetical. If</p> <p>23 what you've called a random sample turned out to be</p> <p>24 under inclusive, wouldn't that alter your</p> <p>25 proportionality analysis?</p>	<p style="text-align: right;">Page 240</p> <p>1 that you've shrunk this down to publicly available</p> <p>2 posts with your testimony that it's a random sample?</p> <p>3 I'm just trying to understand. Does your</p> <p>4 dataset reflect a random sample or does it reflect</p> <p>5 the universe of all public items that hit on your</p> <p>6 search terms?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: It is a random sample of</p> <p>9 all public posts across each of the social media</p> <p>10 sites. You can only scrape and only have access to</p> <p>11 data that is public and not private.</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q Okay. So but it's a sample; it's not</p> <p>14 everything that was publicly available?</p> <p>15 A It is everything that Apify -- let me</p> <p>16 rephrase that, actually, because Apify has access to</p> <p>17 the API. It's everything that the API across each</p> <p>18 of the social media networks allowed Apify to have</p> <p>19 access to.</p> <p>20 Q Okay. How do you know that?</p> <p>21 A I know how APIs work for -- APIs in</p> <p>22 general.</p> <p>23 Q But you didn't use APIs; you used</p> <p>24 scrapers?</p> <p>25 MR. FRITZ: Objection.</p>
<p style="text-align: right;">Page 239</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: I don't see how that's</p> <p>3 possible with the way that a scraper pulls from the</p> <p>4 raw data API. So I can't -- I can't give you -- I'm</p> <p>5 sorry, I can't give you a yes or no based on a</p> <p>6 hypothetical.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q So if -- let's just take this out of this</p> <p>9 report. If you were to determine proportionality</p> <p>10 based on ten to two, okay, like ten posts on X and</p> <p>11 two posts on Reddit, but it turned out there weren't</p> <p>12 really two posts on Reddit; there were 100.</p> <p>13 Wouldn't your proportionality analysis change as</p> <p>14 between ten and two and ten and 100?</p> <p>15 A Technically, that is always true because</p> <p>16 there are many other posts that we do not see</p> <p>17 because they are private. So, for instance, all of</p> <p>18 this is dependent on, number one, you're scraping a</p> <p>19 smaller amount of data than actually exists because</p> <p>20 you're scraping public posts. So you've already</p> <p>21 shrunk the universe down to what is public versus</p> <p>22 private. So if it is based on the same keywords,</p> <p>23 then there should be the same direction</p> <p>24 proportionally.</p> <p>25 Q Okay. So how do you reconcile saying</p>	<p style="text-align: right;">Page 241</p> <p>1 THE WITNESS: So the scraper is Apify's</p> <p>2 terminology. They scrape through an API. So in one</p> <p>3 instance, Instagram has an API. They allow access</p> <p>4 to their API which connects to a raw dataset for</p> <p>5 companies such as Apify, Sprout Social, a myriad of</p> <p>6 different organizations or content creators to</p> <p>7 scrape from.</p> <p>8 Meaning, that they say Instagram, for</p> <p>9 instance, says this is all the public posts based on</p> <p>10 the keywords that you have chosen. We are going to</p> <p>11 allow you access to be able to pull that data.</p> <p>12 So when I say that it's everything that</p> <p>13 Instagram, Reddit, YouTube, et cetera, gave access</p> <p>14 to, it simply means of the public data they say this</p> <p>15 is -- whatever the confines that they decide as a</p> <p>16 social media site -- this is the API's that they</p> <p>17 have available for you to pull from.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Okay. So it's your testimony that every</p> <p>20 actor on Apify acts the way you just described?</p> <p>21 MR. FRITZ: Objection.</p> <p>22 THE WITNESS: I don't know how every</p> <p>23 actor on Apify operates.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q Did you look at how the specific Apify</p>

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<p style="text-align: right;">Page 242</p> <p>1 actors that you used operate?</p> <p>2 A The ones that I used, yes. There are</p> <p>3 ones that I did not use that they have.</p> <p>4 Q So you understand how each of these four</p> <p>5 specific scrapers work?</p> <p>6 A Yes.</p> <p>7 Q Okay. And it's your testimony that these</p> <p>8 four specific scrapers captured all of the publicly</p> <p>9 available data that hit on your search terms during</p> <p>10 the January 2024 to October 2025 time period?</p> <p>11 A No. That's not what I said.</p> <p>12 Q Okay. Say it again, please.</p> <p>13 MR. FRITZ: Objection.</p> <p>14 THE WITNESS: Social media platforms give</p> <p>15 access to third-parties such as Apify through their</p> <p>16 API. Based on the keywords, I'm able to ask Apify</p> <p>17 to go in and quote/unquote scrape the API based on</p> <p>18 the time period and the keywords. Therefore, Apify</p> <p>19 and I have access to whatever the social media</p> <p>20 platforms have allowed them to have access to.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q So you don't know what the social media</p> <p>23 platforms have allowed the Apify actors to have</p> <p>24 access to?</p> <p>25 A I don't know what constraints, if any,</p>	<p style="text-align: right;">Page 244</p> <p>1 the API first. Just because I think in general,</p> <p>2 it's ideal. If I'm not -- if for whatever reason it</p> <p>3 wasn't available, I used Apify.</p> <p>4 Q If the APIs were not available, you used</p> <p>5 Apify?</p> <p>6 A Yes. So sometimes APIs can simply be</p> <p>7 down. They can be sensitive. They cannot run for a</p> <p>8 myriad of different reasons. You might just be</p> <p>9 500th in the queue versus in Apify or Sprout Social,</p> <p>10 that could be number one in the queue.</p> <p>11 Q Okay. You just used what happened --</p> <p>12 what was available to you at the time when you were</p> <p>13 ready to scrape, right?</p> <p>14 A Yes. I used the best source available to</p> <p>15 what I had access to.</p> <p>16 Q Okay. Let's go to report, paragraph 22,</p> <p>17 where you say that:</p> <p>18 (As read):</p> <p>19 "Data was collected through publicly</p> <p>20 available application programming</p> <p>21 interfaces or authorized data-scraping</p> <p>22 tools between January 2024 and</p> <p>23 October 2025."</p> <p>24 So did you -- I'm trying to understand.</p> <p>25 Did you run the tools during that entire time</p>
<p style="text-align: right;">Page 243</p> <p>1 social media sites put on their APIs.</p> <p>2 Q Okay. So it's possible that they only</p> <p>3 allow Apify to access a small amount of the data</p> <p>4 that would have hit on your search terms, right?</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: So, no. That's not what I</p> <p>7 would say. Apify would have the same access as</p> <p>8 Sprouts Social or any other assuming third-party.</p> <p>9 What I mean is that I don't -- of the</p> <p>10 universe that Instagram, as an example, has access</p> <p>11 to give of public posts. I'm simply saying they can</p> <p>12 put constraints, the same way as YouTube can, the</p> <p>13 same way as X can, on what is available to be</p> <p>14 harvested from the API.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q Right. And so you don't know what those</p> <p>17 constraints are?</p> <p>18 MR. FRITZ: Objection.</p> <p>19 THE WITNESS: I do not.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q And your Appendix C says that you used</p> <p>22 the YouTube data API; is that right?</p> <p>23 A Yes.</p> <p>24 Q So you didn't use Apify for YouTube?</p> <p>25 A So I used -- I used all of the -- I used</p>	<p style="text-align: right;">Page 245</p> <p>1 period, or you ran the tools to capture information</p> <p>2 from that time period?</p> <p>3 A I ran the tools to capture information</p> <p>4 from that time period.</p> <p>5 Q Okay. So when -- and you didn't run the</p> <p>6 tools, right; your assistant ran the tools?</p> <p>7 A My assistant, Taylor Hunter, ran the</p> <p>8 tools. I double checked the tools. I also am the</p> <p>9 one who ran the API scrape -- sorry, the YouTube,</p> <p>10 YouTube API scrape.</p> <p>11 Q When did those tools run?</p> <p>12 A October 2025.</p> <p>13 Q On a single day or?</p> <p>14 A No. Over the course of -- so each of the</p> <p>15 platforms ran on a single day. But each platform</p> <p>16 ran on a subsequent day. So I'm just giving this as</p> <p>17 an example. This is not the specifics. YouTube ran</p> <p>18 on Monday, Twitter ran on Tuesday, so on and so</p> <p>19 forth.</p> <p>20 Q Got it. So you ran each network on a</p> <p>21 single day, but not all on the same day?</p> <p>22 A Correct.</p> <p>23 Q And you produced to us your backup data,</p> <p>24 right?</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 246</p> <p>1 Q You produced a number of -- actually</p> <p>2 let's, you know, we have -- we're going to mark as</p> <p>3 exhibit -- am I at 8?</p> <p>4 THE REPORTER: Yeah. And I would like a</p> <p>5 break as soon as we can. We've been going a long</p> <p>6 time. Thank you.</p> <p>7 MS. GOVERNSKI: Yeah, sure. Let's take a</p> <p>8 break. Ms. Alexander, I realize we worked right</p> <p>9 through lunch and it's almost dinner. Do you want</p> <p>10 to take a longer break and get something to eat or</p> <p>11 do you want to just take a quick break and get back</p> <p>12 into it?</p> <p>13 THE WITNESS: I prefer to take a quick</p> <p>14 break and get back into it.</p> <p>15 MS. GOVERNSKI: Okay. Let's go off the</p> <p>16 record.</p> <p>17 THE VIDEOGRAPHER: We're off the record.</p> <p>18 It's 5:20 p.m.</p> <p>19 (Recess.)</p> <p>20 THE VIDEOGRAPHER: We are back on the</p> <p>21 record. It is 5:31 p.m.</p> <p>22 BY MS. GOVERNSKI:</p> <p>23 Q Ms. Alexander, you describe a sentiment</p> <p>24 classification analysis and in paragraph 52 of your</p> <p>25 report, you state that:</p>	<p style="text-align: right;">Page 248</p> <p>1 Q Neutral. How do you define each of those</p> <p>2 three terms?</p> <p>3 A So positive in the classifier looks at</p> <p>4 things that positive -- I'm trying to figure out how</p> <p>5 to define something without using the word. Looks</p> <p>6 at things that are --</p> <p>7 THE REPORTER: Sorry, can you guys hold</p> <p>8 on for a second? I can't hear anything.</p> <p>9 MS. GOVERNSKI: Yeah, let's go off the</p> <p>10 record.</p> <p>11 THE VIDEOGRAPHER: Sure. We're off the</p> <p>12 record. It's 5:33 p.m.</p> <p>13 (Off the record due to audio issues on Zoom.)</p> <p>14 THE VIDEOGRAPHER: We are back on the</p> <p>15 record. 5:44 p.m.</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q Ms. Alexander, can you please explain how</p> <p>18 your sentiment analysis defined positive, negative</p> <p>19 and neutral?</p> <p>20 A So the way that the classifier looks at</p> <p>21 it versus how I would define it, in general, is</p> <p>22 slightly different. The classifier I used for -- it</p> <p>23 looks at it from a score system. So if something is</p> <p>24 based on natural language processing, based on</p> <p>25 fine-tuning, if something is more positive, it has a</p>
<p style="text-align: right;">Page 247</p> <p>1 (As read):</p> <p>2 "Statistical volume analysis alone</p> <p>3 provides an incomplete picture of</p> <p>4 online reputation dynamics."</p> <p>5 And that:</p> <p>6 "A systematic sentiment classification</p> <p>7 analysis was essential."</p> <p>8 That is your opinion, right?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 THE WITNESS: Yes.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q Okay. And what is a systematic sentiment</p> <p>13 classification analysis?</p> <p>14 A Going through and having it look at -- I</p> <p>15 use the three score, which is positive, negative,</p> <p>16 and neutral, on a classifier like BERT. Which is a</p> <p>17 natural language processing solution that is used</p> <p>18 academically, practitionerly. It shows up in</p> <p>19 research, to systematically associate each of the</p> <p>20 data or verbatims qualitative post with a sentiment</p> <p>21 score.</p> <p>22 Q And what is -- you used the terms</p> <p>23 "positive and negative", and what was the third you</p> <p>24 used?</p> <p>25 A The third is neutral.</p>	<p style="text-align: right;">Page 249</p> <p>1 higher positive score. If something is more</p> <p>2 negative, based on its training model, it classifies</p> <p>3 it as negative. And if it's more neutral, is --</p> <p>4 neutral is normally something that is -- I don't</p> <p>5 know want to say factual -- it's something that is</p> <p>6 usually more just straightforward without -- without</p> <p>7 additional nuance of being positive or negative.</p> <p>8 But they're score systems, in BERT.</p> <p>9 Q So the way -- when you were describing</p> <p>10 the classifier, which is positive, negative, or</p> <p>11 neutral, that's the classifiers that BERT itself</p> <p>12 assigns; is that right?</p> <p>13 A Yes. Based on the model, based on</p> <p>14 fine-tuning, the BERT model looks at natural</p> <p>15 language processing to derive if it's positive,</p> <p>16 negative or neutral.</p> <p>17 Q What is "fine-tuning"?</p> <p>18 A Fine-tuning means the sensitivity, the --</p> <p>19 a myriad of different factors. It could be to</p> <p>20 reduce bias, to reduce how the model takes into</p> <p>21 account different parameters.</p> <p>22 Q Did you fine tune your BERT model?</p> <p>23 A No, I did not.</p> <p>24 Q Why not?</p> <p>25 A One, I didn't have access to fine tune.</p>

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<p style="text-align: right;">Page 250</p> <p>1 It is -- the BERT model is for social media 2 analysis. Well, I'm sorry -- it's for natural 3 language processing, so I would argue that it 4 doesn't need to be fine tuned. And I wouldn't -- I 5 wouldn't make any adjustments to the -- 6 Q So what would be -- strike that. 7 What did the -- what types of contents 8 did the BERT model designate as negative in this 9 case? 10 A What types of content -- content that 11 was -- had different degrees. Because again, it's 12 not just negative, it labels it as a score, first, 13 that's on a negative side. It would be things that 14 are derogatory -- derogatory, mean, rude, things of 15 that nature. 16 Q Okay. Derogatory as to whom? 17 A Well, in this case, Blake Lively. 18 Q Okay. So how would it classify content 19 that was derogatory of Mr. Baldoni? 20 A So it would -- if it looked at 21 Mr. Baldoni, based on keywords, it would look at 22 things like the association of the name, the context 23 that his name appeared in, and if the -- if the 24 negative sentiment or -- sorry. If the negative 25 words were applied to Baldoni versus anyone in the</p>	<p style="text-align: right;">Page 252</p> <p>1 THE WITNESS: So if there was negative 2 content in the post that had Blake Lively, because 3 again, there had -- Blake Lively had to show up 4 based on the keyword or parameters I put in. If 5 there was also -- if there was negative content 6 about Baldoni in the same post, then it would, 7 again, associate what the -- what the sentiment was 8 for Lively and not Baldoni. 9 BY MS. GOVERNSKI: 10 Q And how did you teach BERT to look for 11 the sentiment as to Ms. Lively and not look for the 12 sentiment as to Mr. Baldoni? 13 A So it's part of the parameters that I put 14 in around the keywords that you saw in my report. 15 Q What parameters did you put in? How 16 would I know that? 17 MR. FRITZ: Objection. 18 THE WITNESS: Those are the keywords that 19 you see in my report that I've included. 20 BY MS. GOVERNSKI: 21 Q So your keywords were Ms. -- Blake Lively 22 and we can go through some of the specifics, but how 23 did BERT -- how was BERT able to derive from 24 Blake Lively that you're only looking for content 25 that is negative as to Ms. Lively as opposed to</p>
<p style="text-align: right;">Page 251</p> <p>1 post -- in the post. 2 Q So what if a post was about both 3 Ms. Lively and Mr. Baldoni and included positive and 4 negative language, how would BERT know how to 5 classify such a piece of content? 6 A So BERT is trained on natural language 7 processing. It has context, so it looks at the 8 sentence structure and it looks at -- similar to, I 9 guess, deconstructing the English language about who 10 the negative or the positive personifier is 11 associated with, and then it would classify it as 12 positive, negative, or neutral, depending on the 13 keywords -- 14 Q So were you able to tell BERT -- 15 A -- that you're looking for. 16 Q -- that negative content about Ms. Lively 17 should be classified as negative, but negative 18 content about Mr. Baldoni should not? 19 A So I was not -- I didn't include negative 20 content about Baldoni because it was out of scope 21 for the analysis. 22 Q Well, what if your search terms hit on a 23 post that included negative language about 24 Mr. Baldoni? 25 MR. FRITZ: Objection.</p>	<p style="text-align: right;">Page 253</p> <p>1 negative as to any other of the content in the 2 report? 3 A So you're able to isolate who the subject 4 of the sentiment is for. So in this case, it was 5 for Blake Lively. It could mention six other people 6 in the content, but I was only concerned with the 7 sentiment as associated with Blake Lively. 8 BY MS. GOVERNSKI: 9 Q Okay. How are you able to give BERT that 10 direction? 11 MR. FRITZ: Objection. 12 THE WITNESS: So it's part of the 13 parameters when you're setting up the classifier 14 run. 15 BY MS. GOVERNSKI: 16 Q Okay. So did you produce your parameters 17 when you set up the classifier run? 18 A I'm sorry? Did I produce? 19 Q Did you provide to us the parameters for 20 your classifier run? 21 A No, because it specifically negates 22 any -- so the way that you put it into the system, 23 you specify who the subject matter is. And in this 24 case, it's the keywords around Lively. So it's not 25 fine-tuning or anything like that. I'm simply</p>

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<p style="text-align: right;">Page 254</p> <p>1 saying negate anyone other than Lively when applying 2 sentiment scores. 3 Q And where have you explained that in your 4 report? 5 A I don't believe I did. 6 Q So if I wanted to understand all the 7 different parameters that you instructed BERT to 8 follow, how would I do that? 9 A You would still be able to take my 10 dataset, put it into BERT, based on python code that 11 I provided you and keywords and the time frame. 12 There is an element that says do you -- I'm not sure 13 exactly what it says -- but should I focus on the 14 core keywords only or should I analyze additional 15 keywords. Using the keywords I provided, that's the 16 focus of the analysis. 17 Q So the only way that you educate BERT was 18 by putting in the keywords -- 19 MR. FRITZ: Objection. 20 BY MS. GOVERNSKI: 21 Q -- in the instructions? 22 A In the dataset, yes. 23 Q Okay. And you refer to BERT as "the BERT 24 family." You understand that there are multiple 25 types of BERT models, right?</p>	<p style="text-align: right;">Page 256</p> <p>1 of the BERT models. 2 BY MS. GOVERNSKI: 3 Q Too many to even enumerate, right? 4 MR. FRITZ: Objection. 5 THE WITNESS: I don't know if that's 6 true. It's the current version of BERT. 7 BY MS. GOVERNSKI: 8 Q Okay. But if we wanted to replicate your 9 sentiment analysis based on what you disclose in 10 your report, we would have to guess what BERT model 11 you used? 12 MR. FRITZ: Objection. 13 THE WITNESS: I would say you could do 14 that by going to the current BERT model, the latest 15 version. 16 BY MS. GOVERNSKI: 17 Q And just guessing that that's the one you 18 used. 19 MR. FRITZ: Objection. 20 BY MS. GOVERNSKI: 21 Q Is that right? We'd have to just 22 guess -- 23 A Was that statement or a question? 24 Q A question. We would have to just guess 25 that you used the most recent BERT model?</p>
<p style="text-align: right;">Page 255</p> <p>1 A Yes. 2 Q So what BERT model did you use? 3 A I used the most recent BERT model, and I 4 believe I specify it in my report. 5 Q Where did you specify that in your 6 report? 7 A Let's see. I don't put it in there. 8 It's currently the only BERT model that is available 9 through Google. I don't think I specify the date -- 10 the launch date of the BERT model. 11 Q Okay. Well, can you identify the BERT 12 model that you used? 13 MR. FRITZ: Objection. 14 THE WITNESS: I would have to go and 15 reference it. I would have to look it up. 16 BY MS. GOVERNSKI: 17 Q Okay. Is there a reason you didn't 18 disclose the specific BERT model you used? 19 A There's no reason. It's part of the BERT 20 family so it's the one that's is currently 21 accessible. 22 Q But BERT models -- in order to replicate 23 it, there is a lot BERT models, right? 24 MR. FRITZ: Objection. 25 THE WITNESS: There's different versions</p>	<p style="text-align: right;">Page 257</p> <p>1 MR. FRITZ: Objection. 2 THE WITNESS: You -- you -- there would 3 be an inference that the latest one would be the one 4 that you could default to. 5 BY MS. GOVERNSKI: 6 Q Okay. Is BERT or LLM a newer model? 7 A LLM stands for Large Language Model. So 8 you'd have to be specific on what LLM you're 9 referring to. 10 Q Okay. Well, did BERT models precede 11 large language models? 12 A They did. 13 Q Okay. So it doesn't depend on what type 14 of LLM, right, it just -- BERT preceded LLMs? 15 MR. FRITZ: Objection. 16 THE WITNESS: So BERT is natural language 17 processing. And BERT is -- I believe BERT models 18 came out, I'm guessing, but maybe 20 -- 15 to 20 19 years ago. 20 BY MS. GOVERNSKI: 21 Q Okay. And where did you obtain your BERT 22 model from, you said Google? 23 A Yes, correct. 24 Q Did you run the BERT model using a 25 computer program?</p>

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<p style="text-align: right;">Page 258</p> <p>1 A Using Python, yes.</p> <p>2 Q And how did you write the code to call</p> <p>3 the specific model and version that you mentioned?</p> <p>4 A So my assistant wrote the code, and I</p> <p>5 shared the code for each of the -- for each of the</p> <p>6 scrapes and for the sentiment.</p> <p>7 Q Do you know how to write code?</p> <p>8 A I know how to write code, enough. I</p> <p>9 wouldn't say I am the person to write code for</p> <p>10 complex matters by any means.</p> <p>11 Q Okay. So in the code that you produced,</p> <p>12 what version of the BERT model does it reflect?</p> <p>13 MR. FRITZ: Objection.</p> <p>14 THE WITNESS: It should reflect the most</p> <p>15 recent version.</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q The most recent as of what date?</p> <p>18 MR. FRITZ: Objection.</p> <p>19 THE WITNESS: As of October 2025.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Okay. Did you apply the BERT model on</p> <p>22 all of your dataset?</p> <p>23 A Yes.</p> <p>24 Q Okay. If I want to understand how your</p> <p>25 BERT model classified all of the information in your</p>	<p style="text-align: right;">Page 260</p> <p>1 Q But I'm not asking for an aggregate, I'm</p> <p>2 asking for the score for each individual post.</p> <p>3 MR. FRITZ: Objection.</p> <p>4 THE WITNESS: So the output from BERT is</p> <p>5 it clusters together. So it provided the score</p> <p>6 of -- the score of positive, negative and neutral.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q So there is no way to see how it</p> <p>9 classified any individual social media item?</p> <p>10 MR. FRITZ: Objection.</p> <p>11 THE WITNESS: Is there a way to classify,</p> <p>12 no.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q So you have no way of knowing if it</p> <p>15 accurately classified any of the 43,992 pieces of</p> <p>16 social media items?</p> <p>17 MR. FRITZ: Objection.</p> <p>18 THE WITNESS: I'm sorry. You mean</p> <p>19 44,000?</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q 43,992.</p> <p>22 A So I was able to go in the system and we</p> <p>23 hand verified a certain portion, which I reference</p> <p>24 in my report. So we went through and looked at 300</p> <p>25 different posts. I believe it was 300, I'd have to</p>
<p style="text-align: right;">Page 259</p> <p>1 dataset, how would I do that?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 THE WITNESS: How it classified? You</p> <p>4 would have to go into BERT to understand its general</p> <p>5 classifier system.</p> <p>6 BY MS. GOVERNSKI:</p> <p>7 Q But if I wanted to understand any one</p> <p>8 post to understand how your BERT model classified</p> <p>9 that one post, how would I do that?</p> <p>10 MR. FRITZ: Objection.</p> <p>11 THE WITNESS: So you can see the score</p> <p>12 based on the dataset I provide. You can see the</p> <p>13 score that BERT gave each piece of -- each piece</p> <p>14 of -- of -- excuse me -- each post. But if your</p> <p>15 question is how it classified, there is -- you would</p> <p>16 have to go into the BERT model itself when</p> <p>17 replicating the run. Actually, I'm sorry. I'm</p> <p>18 going to -- that wouldn't be. You would have to go</p> <p>19 into BERT itself to understand, into the developer</p> <p>20 tools.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q So where did you disclose the score for</p> <p>23 each post?</p> <p>24 A So I provided an aggregate, and it's in</p> <p>25 the zip file that was submitted.</p>	<p style="text-align: right;">Page 261</p> <p>1 just double check.</p> <p>2 Q Okay.</p> <p>3 A To -- hand eye verify the sentiment</p> <p>4 scores that they were correct in conjunction with</p> <p>5 the individual posts.</p> <p>6 Q Well, how did you know sentiment scores</p> <p>7 of those 300 posts?</p> <p>8 A Because it provides it in a -- you can</p> <p>9 open the tabs to see how their -- how the system is</p> <p>10 identifying the individual pieces of content.</p> <p>11 Q So you -- there is a way in the system to</p> <p>12 know how it's identifying each individual post?</p> <p>13 A Yes. To verify it, correct.</p> <p>14 Q And why haven't you provided us with that</p> <p>15 underlying classification data?</p> <p>16 MR. FRITZ: Objection.</p> <p>17 THE WITNESS: Because it wasn't necessary</p> <p>18 in order to replicate my work.</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q Well, if we want to be able to check how</p> <p>21 your BERT analyzer classified each one of the 43,992</p> <p>22 social media items, how could we do that?</p> <p>23 MR. FRITZ: Objection.</p> <p>24 THE WITNESS: You could -- you could</p> <p>25 replicate the run itself, based on the data that I</p>

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<p style="text-align: right;">Page 262</p> <p>1 provided.</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q But if we wanted to understand how your</p> <p>4 BERT model, the way you ran it, classified each one</p> <p>5 of those posts, how could we do that?</p> <p>6 MR. FRITZ: Objection.</p> <p>7 THE WITNESS: The only way would be to</p> <p>8 rerun it based on the code and dataset that I</p> <p>9 provided.</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q Well, if you were able to go in and see</p> <p>12 how all of the 43,000 social media items were</p> <p>13 classified, couldn't you just produce the outcome of</p> <p>14 that for us?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: So the extract was an</p> <p>17 aggregate, was -- the downloadable version is an</p> <p>18 aggregate.</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q But for the 300 posts, couldn't you just,</p> <p>21 like, take a screenshot of it?</p> <p>22 MR. FRITZ: Objection.</p> <p>23 THE WITNESS: I'm sure, yes, that's one</p> <p>24 feasible way of capturing something that is on the</p> <p>25 screen. You wouldn't get all 300 in said</p>	<p style="text-align: right;">Page 264</p> <p>1 is -- because it's just the subset, it's a</p> <p>2 randomized subset. So that was, again, randomized,</p> <p>3 so we went through and hand confirmed that the score</p> <p>4 made sense to the physical post. And we did that in</p> <p>5 the environment itself.</p> <p>6 BY MS. GOVERNSKI:</p> <p>7 Q I understand. But how long did it take</p> <p>8 you to pull the specific sentiment classify --</p> <p>9 strike that.</p> <p>10 How long did it take you -- I'm not</p> <p>11 talking about performing the analysis -- just to</p> <p>12 pull the information about how the 300 posts were</p> <p>13 classified?</p> <p>14 MR. FRITZ: Objection.</p> <p>15 THE WITNESS: So I'm not sure how much</p> <p>16 time it took because we looked at 300 randomized</p> <p>17 rows in the environment to confirm or disconfirm</p> <p>18 that the score itself was accurate.</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q So if you don't know how long that took,</p> <p>21 how do you know how long it would take you to run</p> <p>22 the same instruction on all of the social media</p> <p>23 items in your dataset?</p> <p>24 A So doing a -- performing by eye or hand</p> <p>25 to confirm if the score is accurate or not is done</p>
<p style="text-align: right;">Page 263</p> <p>1 screenshot, but yes.</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q Yeah, but there is a feasible way that</p> <p>4 you could give us the classifications of your</p> <p>5 sentiment analysis, right?</p> <p>6 MR. FRITZ: Objection.</p> <p>7 THE WITNESS: So I did in aggregate. I</p> <p>8 didn't on each individual post.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q But there is a way, a feasible way that</p> <p>11 you could do it for each individual post, right?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: It would have -- it would</p> <p>14 have been more work to extract it, and I didn't</p> <p>15 believe it was necessary.</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q How much more work?</p> <p>18 A I'd have to go through in the system to</p> <p>19 see, but it's not just a download of the CSV.</p> <p>20 Q So how long did it take you to do those</p> <p>21 300 posts?</p> <p>22 A To do the verification of the 300 posts?</p> <p>23 Q No, to pull that data of 300 posts.</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: So the verification which</p>	<p style="text-align: right;">Page 265</p> <p>1 in real time in the environment. I simply can't</p> <p>2 tell you how long that took. I'm not sure what your</p> <p>3 question...</p> <p>4 Q Yeah, what I'm asking you is --</p> <p>5 MR. FRITZ: Objection.</p> <p>6 BY MS. GOVERNSKI:</p> <p>7 Q -- you were able to identify 300 posts,</p> <p>8 right? You were able to do a query and say pull 300</p> <p>9 posts and tell me how you classified these 300,</p> <p>10 right?</p> <p>11 A We looked at 300 posts that were</p> <p>12 classified.</p> <p>13 Q Okay. So how were you able to understand</p> <p>14 the classifications of those 300 specific items?</p> <p>15 A We looked at the content. So the post</p> <p>16 itself, the verbiage, and we looked at the score</p> <p>17 that was given by BERT, the classifier to understand</p> <p>18 if that score was accurate, based on general</p> <p>19 knowledge of reading the posts and interpreting,</p> <p>20 based on just general knowledge of what would be</p> <p>21 positive, negative or neutral.</p> <p>22 Q Okay. And if you wanted to understand</p> <p>23 how your sentiment analysis classified each of the</p> <p>24 42,000, how would you do that? 43,000. Sorry.</p> <p>25 MR. FRITZ: Objection.</p>

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<p style="text-align: right;">Page 266</p> <p>1 THE WITNESS: So one way is to go through 2 and eyeball every single one, to go through and look 3 at the score and to look at the copy that is from 4 the post. 5 BY MS. GOVERNSKI: 6 Q I'm trying to understand where you would 7 look to see the score for each individual post. 8 MR. FRITZ: Objection. 9 THE WITNESS: You would look in the BERT 10 model itself, after it's classified, each piece of 11 content. 12 BY MS. GOVERNSKI: 13 Q Okay. So there exists, in the BERT 14 model, a way to see how it classified each 15 individual post? 16 A In the environment, yes. 17 Q And you did not produce to us any 18 individual scores for any individual posts, right? 19 MR. FRITZ: Objection. 20 THE WITNESS: I did not produce scores 21 for each individual piece of content. 22 BY MS. GOVERNSKI: 23 Q And you didn't produce even -- sorry. 24 Scratch that. 25 You didn't identify the specific 300</p>	<p style="text-align: right;">Page 268</p> <p>1 MR. FRITZ: Objection. 2 THE WITNESS: That is correct. 3 MS. GOVERNSKI: My colleague is going to 4 move nine documents into being Exhibit Share. I'm 5 going to mark them as exhibits -- starting with 6 Exhibit 8. So it will be 8, 9, 10, 11, 12, 13, 14, 7 15, 16. So she's going to move them all in there. 8 BY MS. GOVERNSKI: 9 Q And while she does, can you tell me what 10 BERT stands for? 11 A Bidirectional -- bidirectional is the 12 most important part. I'm not sure what the rest of 13 it stands for. 14 Q And how often have you used BERT other 15 than in this case? 16 A Probably once a week, this particular -- 17 from September to present. I use it for class. I 18 use it for work previously. Yeah, often. 19 Frequently. 20 Q So you personally run BERT weekly? 21 A I personally use BERT for a myriad of 22 different things in relation to my class. So my 23 students are asked to run simulations, things of 24 that nature. I use it for nonwork-related elements, 25 as well as previously for work-related.</p>
<p style="text-align: right;">Page 267</p> <p>1 posts that you checked, right? 2 A No, it was a randomized post -- it was 3 randomized 300 in order to confirm that the 4 classifier was accurate. Again, to reproduce it, 5 you wouldn't need that. You're able to reproduce it 6 based on what we provided. 7 Q Are we? Are we able to reproduce a 8 randomized -- how do you know that my randomized 9 sample would be the same as your randomized sample? 10 MR. FRITZ: Objection. 11 THE WITNESS: You're able to produce 12 the -- in aggregate, the classifier, based on the 13 model that I gave you -- or based on the BERT family 14 using the latest model and the dataset. 15 BY MS. GOVERNSKI: 16 Q But that's not my question. My question 17 is: How could I receive the exact same 300 posts 18 that you conducted your manual review on? 19 MR. FRITZ: Objection. 20 THE WITNESS: If it's randomized, you 21 cannot. 22 BY MS. GOVERNSKI: 23 Q So I cannot identify what 300 posts you 24 manually reviewed based on the information that 25 you've disclosed, right?</p>	<p style="text-align: right;">Page 269</p> <p>1 Q Okay. Do you see Exhibits 8 through 16 2 in your Exhibit Share? Or it's 8 to 11 right now. 3 But there are more coming in. Why don't you go 4 ahead and open Exhibit 8. And my colleague, Autumn, 5 will also put it on the screen. 6 A One second. Eleven is the last one? 7 Q I'm looking at Exhibit 8 right now. 8 A I'm downloading, is 11 the last one? 9 MS. GOVERNSKI: Oh, there is 13. Well, 10 it should be 8 through 16. There's going to be nine 11 altogether. 12 (Exhibit 8 marked for identification.) 13 THE WITNESS: Okay. Go right ahead. 14 BY MS. GOVERNSKI: 15 Q Okay. So you see the post on your 16 screen, it's looks like a Twitter post. 17 A Exhibit 6? 18 Q Exhibit 8. 19 A Sorry. 8. 20 Q It's also on your screen, you can see it 21 marked. 22 A Yes. 23 Q Okay. And you see the second tweet that 24 says: 25 (As read):</p>

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<p style="text-align: right;">Page 270</p> <p>1 "Paying their effing salaries and 2 pensions. WTF is wrong with us? 3 That's \$5 billion we sent to Ukraine 4 this week. Eff @ZelenskyyUA. It will 5 be great when this grift ends." 6 Do you see that? 7 A Yes. I have it, yes. 8 Q Do you have any opinions as to this 9 tweet? 10 A I don't have any opinions, no. 11 Q Does it have anything to do with 12 Ms. Lively? 13 MR. FRITZ: Objection. 14 THE WITNESS: Sorry. Not based on what 15 I'm looking at right now, no. 16 BY MS. GOVERNSKI: 17 Q Okay. Based on what you're looking at 18 right now, would you include this tweet in your 19 dataset? 20 A Would I include it or would it come up in 21 my dataset? I'm sorry. I just need to specify. 22 Q Both. 23 MR. FRITZ: Objection. 24 BY MS. GOVERNSKI: 25 Q Both.</p>	<p style="text-align: right;">Page 272</p> <p>1 as neutral. 2 Q And if we wanted to figure that out, we 3 would have to go into your BERT system? 4 MR. FRITZ: Objection. 5 THE WITNESS: The BERT system? 6 BY MS. GOVERNSKI: 7 Q Yes. 8 A Yes. 9 MS. GOVERNSKI: Okay. Let's go to 10 Exhibit 9. Hopefully, we can get through these 11 pretty quick. 12 (Exhibit 9 marked for identification.) 13 BY MS. GOVERNSKI: 14 Q This is a tweet -- let's zoom in a little 15 bit -- that says: 16 (As read) 17 "@DrainBamager, MJF is better than us 18 and we all know it. Pretty sad Adam 19 Cole with his henchman and the devil 20 garbage. Can't wait till MJF kicks his 21 chulo and ends this story." 22 Do you have any opinions on this tweet? 23 A No, I don't have any opinions. 24 Q Would you expect to see this tweet in 25 your dataset?</p>
<p style="text-align: right;">Page 271</p> <p>1 MR. FRITZ: Objection. 2 THE WITNESS: So I don't include any of 3 the data in my dataset, just to be clear. The data 4 that I pull, for instance, comes from the keywords 5 through Apify from the API. 6 BY MS. GOVERNSKI: 7 Q Okay. Would you expect to see this tweet 8 in your dataset? 9 MR. FRITZ: Objection. 10 THE WITNESS: I wouldn't expect it. I 11 would have to see why it would have come up, maybe 12 because of a hashtag or something. But no. 13 BY MS. GOVERNSKI: 14 Q Okay. But based on the content on your 15 screen, you wouldn't expect this to be in your 16 dataset? 17 A No. 18 Q And how would your BERT sentiment 19 analysis categorize this tweet? 20 A I can't say definitively how BERT would 21 classify it because that's just outside of my 22 knowledge set. You would have to go in and run it 23 through BERT. But if it was asked to classify it 24 for Blake Lively around the keywords that I use in 25 my report, it would either negate it or classify it</p>	<p style="text-align: right;">Page 273</p> <p>1 A So if it showed up in the dataset, it 2 should be either negated or marked as neutral. 3 Q So when you say "negated," what does that 4 mean? 5 A Negated meaning that it -- it wouldn't 6 actually be a part of the extraction of the data 7 that was pulled. 8 Q So how do we know if posts have been 9 negated? 10 MR. FRITZ: Objection. 11 THE WITNESS: So as part of the dataset 12 that I sent you, it wouldn't be in that dataset. 13 BY MS. GOVERNSKI: 14 Q Oh, okay. So it would -- if it was 15 negated, it wouldn't be in the dataset you sent us? 16 A So there's two ways of negating. There's 17 negating at the extraction through Apify. So 18 confirming that the content is -- is based on the 19 parameters that we plugged into Apify. The second 20 area of negation when it comes to -- when it comes 21 to sentiment scoring. So on the sentiment scoring 22 side, it would either be marked as neutral or it 23 wouldn't say N/A., but it would have, like, a score 24 of zero. 25 Q So it would be included in the dataset</p>

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<p style="text-align: right;">Page 274</p> <p>1 you provided us?</p> <p>2 A If it wasn't negated at the Apify pull</p> <p>3 and it was one of the posts in the dataset, then it</p> <p>4 wouldn't have been reflective in the sentiment</p> <p>5 analysis as a positive or negative.</p> <p>6 Q And how could we check to understand if</p> <p>7 your sentiment analysis negated a post like this?</p> <p>8 A So the classifier would negate it because</p> <p>9 it's not talking about Blake Lively. The terms that</p> <p>10 it's looking to categorize the sentiment.</p> <p>11 Q But my question is: How would we know if</p> <p>12 your sentiment analyzer negated this post or</p> <p>13 classified it?</p> <p>14 MR. FRITZ: Objection.</p> <p>15 THE WITNESS: So it's not my sentiment</p> <p>16 classifier. The BERT classifier would usually look</p> <p>17 at something like this, and based on it not having</p> <p>18 Blake Lively or the terms that I referenced in my</p> <p>19 report, then there is no negative or positive</p> <p>20 scoring to put in conjunction with that name.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q So we should just assume that sentiment</p> <p>23 analysis that you did, did something with this post?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: So this post, number one, I</p>	<p style="text-align: right;">Page 276</p> <p>1 not count this in your dataset?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 THE WITNESS: Based on my knowledge of</p> <p>4 how BERT as a classifier works --</p> <p>5 MS. GOVERNSKI: Okay. Let's go to</p> <p>6 Exhibit 10, which is a Reddit -- a post from Reddit</p> <p>7 about Sabrina Carpenter.</p> <p>8 (Exhibit 10 marked for identification.)</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q What is this post? Do you know?</p> <p>11 A It's about her Eras tour.</p> <p>12 Q So is this a Reddit or a subreddit?</p> <p>13 A Well, subreddit is a part of Reddit --</p> <p>14 Q Can you explain the difference?</p> <p>15 A It just means it's a sub-domain on</p> <p>16 Reddit.</p> <p>17 MR. FRITZ: Objection.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Okay. Understood. So that R/pop culture</p> <p>20 chat, is that a subreddit?</p> <p>21 A So that would be construed as a sub -- a</p> <p>22 section in Reddit, yes.</p> <p>23 Q So that's a subreddit?</p> <p>24 A There is -- I want to be specific because</p> <p>25 people define subReddits in very different ways. So</p>
<p style="text-align: right;">Page 275</p> <p>1 don't recognize this post so I can't say if this is</p> <p>2 one of the posts from the dataset or not. And if it</p> <p>3 went into the classifier, then the classifier would</p> <p>4 operate as though, again, because we don't see any</p> <p>5 context for Blake Lively in here, so the classifier</p> <p>6 would not give it a positive or negative scoring.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q And that's just based on your own hunch</p> <p>9 about this, about how the classifier would treat</p> <p>10 this post?</p> <p>11 MR. FRITZ: Objection.</p> <p>12 THE WITNESS: That's how the BERT family</p> <p>13 works.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q But I'm talking about this specific post.</p> <p>16 If this specific post was in your sentiment</p> <p>17 analyzer, how would you confirm how it handled it?</p> <p>18 A The classifier operates that it takes</p> <p>19 into account context and it takes into account who</p> <p>20 is being spoken about, whether it's a brand or a</p> <p>21 person. So because I asked for Blake Lively, along</p> <p>22 with the other keywords that I referenced, Blake</p> <p>23 Lively does not show up so it can't score sentiment</p> <p>24 to something that doesn't exist.</p> <p>25 Q So it's your assumption that BERT would</p>	<p style="text-align: right;">Page 277</p> <p>1 it is a section on Reddit or a group on Reddit.</p> <p>2 Q Well, how do you define "subReddits"?</p> <p>3 A I -- rather, instead using the word, I</p> <p>4 would rather just be specific in distinguishing what</p> <p>5 it is.</p> <p>6 So if you go to Reddit, this looks like</p> <p>7 it was pulled from an area of Reddit or group that's</p> <p>8 called -- I'm sorry -- that's called pop culture</p> <p>9 chat.</p> <p>10 Q And do you have any opinions on this</p> <p>11 post?</p> <p>12 A No --</p> <p>13 Q Would you expect to see this post in your</p> <p>14 dataset?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MS. GOVERNSKI:</p> <p>18 Q And how would your BERT sentiment</p> <p>19 analysis categorize this post?</p> <p>20 MR. FRITZ: Objection.</p> <p>21 THE WITNESS: If it was put into BERT</p> <p>22 based on parameters that I used, the keywords, then</p> <p>23 it would classify it as neutral or ignore it.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q What is the difference between neutral or</p>

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<p style="text-align: right;">Page 278</p> <p>1 ignore?</p> <p>2 A So it might come back with an error --</p> <p>3 sorry, I shouldn't say error. It might come back</p> <p>4 with code of no. Depending on, again, if -- if</p> <p>5 there was multiple rows of data that didn't have</p> <p>6 keywords for Blake Lively.</p> <p>7 MS. GOVERNSKI: Okay. Let's go to</p> <p>8 Exhibit 11, which is another piece of content from</p> <p>9 Reddit. If we can scroll up a little bit, Autumn.</p> <p>10 (Exhibit 11 marked for identification.)</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q So it says:</p> <p>13 (As read):</p> <p>14 "r/FauxMoi"</p> <p>15 So would you describe that as a</p> <p>16 subsection of Reddit?</p> <p>17 A It looks like it's a group on Reddit,</p> <p>18 yes.</p> <p>19 Q Okay. And the title of this is: "Frances</p> <p>20 Bean Cobain Pays Tribute to her Father, Kurt Cobain,</p> <p>21 30 years After His Death."</p> <p>22 Would you expect this post on Reddit to</p> <p>23 be part of your dataset?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: I wouldn't. No.</p>	<p style="text-align: right;">Page 280</p> <p>1 A I see that.</p> <p>2 Q Okay. Would you expect this Instagram</p> <p>3 post to be in your dataset?</p> <p>4 A So it appears that there is multiple</p> <p>5 images in this. So I would have to see -- as you</p> <p>6 can see from the arrow on the right-hand side. So I</p> <p>7 would have to understand what data was scraped on</p> <p>8 the other pages.</p> <p>9 Q But from this specific comment.</p> <p>10 (As read):</p> <p>11 "Okay and this show of course! What's</p> <p>12 your comfort read, song, show?"</p> <p>13 Would you expect that specific comment to</p> <p>14 be included in your dataset?</p> <p>15 A Just the comment?</p> <p>16 Q Yup.</p> <p>17 A Just that one specific comment?</p> <p>18 Again, I would have to look at additional</p> <p>19 context of the entire Instagram post. But I'm not</p> <p>20 sure.</p> <p>21 MS. GOVERNSKI: Okay. Let's go to</p> <p>22 Exhibit 13 which is an Instagram post that says --</p> <p>23 has a lot of hashtags and says.</p> <p>24 (As read):</p> <p>25 "Choose what makes your heart bloom."</p>
<p style="text-align: right;">Page 279</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q How would your BERT sentiment analysis</p> <p>3 categorize this post?</p> <p>4 MR. FRITZ: Objection.</p> <p>5 THE WITNESS: Again, similarly as what I</p> <p>6 mentioned previously, it would either come back as a</p> <p>7 null or it would classify it as neutral.</p> <p>8 MS. GOVERNSKI: Okay. Let's go to 12,</p> <p>9 Exhibit 12, which is an Instagram post.</p> <p>10 (Exhibit 12 marked for identification.)</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q You see the first comment is</p> <p>13 "bookishrhapsodic."</p> <p>14 Do you see that post that I'm referring</p> <p>15 to?</p> <p>16 A The one on the screen, "me, my books"?</p> <p>17 Q No, on the right side, you see the first</p> <p>18 comment:</p> <p>19 (As read):</p> <p>20 "Okay. And this show of course!</p> <p>21 What's your comfort read, song, show?"</p> <p>22 Do you see that?</p> <p>23 A Yes.</p> <p>24 Q And that's by someone, book IS --</p> <p>25 bookishrhapsodic?</p>	<p style="text-align: right;">Page 281</p> <p>1 (Exhibit 13 marked for identification.)</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q Do you see that?</p> <p>4 A Yes.</p> <p>5 Q So would you expect this to be in your</p> <p>6 dataset?</p> <p>7 MR. FRITZ: Objection.</p> <p>8 THE WITNESS: So again, you can see this</p> <p>9 is one of two images based on the dots along the</p> <p>10 bottom. I would have to see the full context.</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q What about this one quote:</p> <p>13 (As read):</p> <p>14 "Choose what makes your heart bloom."</p> <p>15 Followed by hashtags. Would you expect</p> <p>16 that one comment to be in your dataset?</p> <p>17 A If it was, again, it would be negated</p> <p>18 from a sentiment perspective. But yeah, no.</p> <p>19 MS. GOVERNSKI: Okay. And let's go to</p> <p>20 Exhibit 14, which is a post on TikTok. It's really</p> <p>21 hard to see, Autumn, can you Zoom in as much as you</p> <p>22 can to the bottom where you see "moon struck fate."</p> <p>23 (Exhibit 14 marked for identification.)</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q And it says "finale" followed by a series</p>

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<p style="text-align: right;">Page 282</p> <p>1 of hashtags.</p> <p>2 "IP, only pen voiceover on hyphen be</p> <p>3 lift on hyphen island -- hyphen is</p> <p>4 island.</p> <p>5 Do you see that?</p> <p>6 A Yeah. I can't make it out but I see the</p> <p>7 post itself.</p> <p>8 Q Would you expect that -- this post to be</p> <p>9 included in your dataset?</p> <p>10 A Not sure. I would say no.</p> <p>11 MS. GOVERNSKI: Okay. Let's look at the</p> <p>12 next one. Exhibit 15, which is another TikTok and</p> <p>13 let's zoom way in again, Autumn.</p> <p>14 (Exhibit 15 marked for identification.)</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q The message on the bottom says:</p> <p>17 (As read):</p> <p>18 "Massage is a path to a happier life.</p> <p>19 Book a massage appointment and let's be</p> <p>20 happy."</p> <p>21 And then it has a series of hashtags.</p> <p>22 Do you see that?</p> <p>23 A I do.</p> <p>24 Q Would you expect this to be in your</p> <p>25 dataset?</p>	<p style="text-align: right;">Page 284</p> <p>1 looking at it, it would classify this either as</p> <p>2 again going to null or as neutral.</p> <p>3 Q Okay. So you produced your underlying</p> <p>4 data to us, right?</p> <p>5 A Yes.</p> <p>6 Q And you produced a series of README</p> <p>7 files, actually five of them. One for each</p> <p>8 platform; is that correct?</p> <p>9 A That's correct.</p> <p>10 Q Okay. Who -- what are the README files?</p> <p>11 MR. FRITZ: Objection.</p> <p>12 THE WITNESS: The README files are</p> <p>13 instructions.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q Instructions to what?</p> <p>16 A Instructions to the recipient to give</p> <p>17 context, to give additional information, to</p> <p>18 contextualize.</p> <p>19 Q Who wrote the content of the README</p> <p>20 files?</p> <p>21 A My assistant wrote the content for the</p> <p>22 README files.</p> <p>23 Q Your assistant we talked about?</p> <p>24 A Taylor Hunter.</p> <p>25 Q Okay. Ms. Hunter. Did you review the</p>
<p style="text-align: right;">Page 283</p> <p>1 A Again, just because this is obviously a</p> <p>2 video still, I don't know what the rest of the video</p> <p>3 content is. So based on just the content that I can</p> <p>4 see at the bottom, then I would say no.</p> <p>5 Q So when your BERT sentiment analyzer was</p> <p>6 looking at content, would it look at the actual</p> <p>7 video?</p> <p>8 MR. FRITZ: Objection.</p> <p>9 THE WITNESS: It would look at the -- it</p> <p>10 would look at the data around the post. So when</p> <p>11 it's video for instance, it looks at things like the</p> <p>12 metadata. It looks at context around what the --</p> <p>13 what the hashtags are, what the posts are, written</p> <p>14 content is underneath. And any other data points</p> <p>15 that are able to be extracted.</p> <p>16 BY MS. GOVERNSKI:</p> <p>17 Q Okay. So that way you just described</p> <p>18 what's underneath, it would look at included in what</p> <p>19 it would look at would be this text: "Massage is a</p> <p>20 path to a healthier life", et cetera?</p> <p>21 A Correct. That would be one of the pieces</p> <p>22 it would look at.</p> <p>23 Q How would your BERT analyzer classify</p> <p>24 this post?</p> <p>25 A In the context of the keywords that I was</p>	<p style="text-align: right;">Page 285</p> <p>1 content of the README files?</p> <p>2 A Yes.</p> <p>3 Q Did you -- is all of the README files you</p> <p>4 produced to us accurate?</p> <p>5 A I would have flagged anything that I saw</p> <p>6 as an issue. So accuracy on a README file is -- I'm</p> <p>7 not sure how to say if something is right or</p> <p>8 wrong --</p> <p>9 Q But you would have reviewed all of the</p> <p>10 README files before you produced them to us?</p> <p>11 A Before I submitted them. Yes.</p> <p>12 MS. GOVERNSKI: I'm going to mark as</p> <p>13 Exhibit 16 the README file that you produced to us</p> <p>14 in connection with your Reddit analysis. Just give</p> <p>15 Autumn a second. Okay. It should be in there and</p> <p>16 Autumn will put it on the screen.</p> <p>17 (Exhibit 16 marked for identification.)</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Okay. Ms. Alexander, is this the Reddit</p> <p>20 README file that you produced to us?</p> <p>21 A I'm sorry. Which -- is this Exhibit 16?</p> <p>22 Q Yes.</p> <p>23 A Yes. It looks like.</p> <p>24 Q It says here.</p> <p>25 (As read):</p>

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<p style="text-align: right;">Page 286</p> <p>1 "Quick Analysis of Blake Lively Reddit 2 posts, (January 2024 to October 2025) 3 879 posts total from the dataset." 4 Do you see that? 5 A I'm sorry. What are you? 6 Q Just reading the first two lines. 879 7 posts total from the dataset. 8 Do you see that? 9 A I do. 10 Q Okay. So this references posts, not 11 comments, right? 12 A This is referring to posts. Correct. 13 Q So you didn't collect comments. Only 14 posts on Reddit? 15 A So with the posts, there are comments 16 associated with them as well. 17 Q But this doesn't say that. This says 879 18 posts. 19 MR. FRITZ: Objection. 20 THE WITNESS: So with the posts, comments 21 are usually associated. So you just showed me 22 TikTok. That was a post. And then you README the 23 comments that were associated with that post. 24 BY MS. GOVERNSKI: 25 Q So is the database that you produced of</p>	<p style="text-align: right;">Page 288</p> <p>1 Q The comments would be contained within 2 the spreadsheet? 3 A Within the row, yes. 4 Q Okay. And the date here is January 2024 5 to October 2025. Why for purposes of Reddit did you 6 include posts that went back to January 2024? 7 A So the target that I was looking at was 8 January 2024 to the present, which for this report, 9 was October 2025. 10 Q But if your baseline was May to June of 11 2024, why did you include in your Reddit analysis 12 posts between January and May 2024? 13 A So that helps when doing the forecast 14 that is in my report to have a larger period of data 15 in order to look at a regression and to forecast 16 with and without the spike. 17 Q Okay. So the specific -- if we were 18 to -- wanted to understand what of the 18,879 posts 19 were from the baseline period, we would look in your 20 backup data and look at the dates of the posts 21 themselves? 22 A I'm sorry. Say that once more? 23 Q Let's look. It says baseline period is 24 May to July 2024. Mean is about 20 posts a month. 25 Do you see that?</p>
<p style="text-align: right;">Page 287</p> <p>1 Reddit, does it include all of the posts and the 2 comments that were -- that comprised your dataset? 3 A So the -- I have to go back and look. 4 But the posts should include the comments that were 5 on that post. 6 MS. GOVERNSKI: Okay. So it's your 7 position when it says 879 posts, that each 8 individual one would include however many comments 9 were part of that post? 10 A If they were associated with the post. 11 Q Associated with the post means under the 12 post? Responding to the post? 13 A So if the data extract allowed for the 14 comments to be pulled with the post, then yes, the 15 comments would be associated with the post. 16 Q Well, this isn't hypothetical. Did your 17 Reddit scraper that you used allowed you to pull the 18 comments? 19 MR. FRITZ: Objection. 20 THE WITNESS: I would need to go in and 21 actually look at the data. 22 BY MS. GOVERNSKI: 23 Q How would it look like in the data? What 24 would it look like? 25 A It would be a row of data.</p>	<p style="text-align: right;">Page 289</p> <p>1 A Yes. 2 Q So 20 posts a month for three months 3 would be 60 posts? 4 A Baseline period May through July. 5 August 2024. Mean is approximately 20 posts per 6 month. Yes. The average is approximately 20 posts 7 per month. 8 Q Your dataset of May to July 2024, the 9 baseline period is around 60 posts? 10 A Sixty posts via -- 11 Q Reddit. 12 A This particular. Yes. 13 Q Okay. And in your opinion is 60 posts 14 sufficient to draw any conclusions about that 15 baseline period? 16 A So in itself, no. In aggregate, yes. 17 Q In aggregate with the other baseline 18 numbers in your other dataset? 19 A Right. Which is why I looked at five 20 different -- 21 Q Okay. 22 A -- social media platforms. 23 Q Okay. And this is accurate that August 24 of 2024 had 105 posts? 25 A I would have to go back and just double</p>

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<p style="text-align: right;">Page 290</p> <p>1 check.</p> <p>2 Q But you have no reason to think that your</p> <p>3 README files are not accurate, right?</p> <p>4 A No. There's no reason to assume that.</p> <p>5 Q Actually do you know how many comments</p> <p>6 and posts on Reddit were included in Dr. Mayzlin's</p> <p>7 dataset?</p> <p>8 A How many comments and posts from Reddit</p> <p>9 were included in Mayzlin's? I don't have offhand.</p> <p>10 I have to refer to the report.</p> <p>11 Q If I were to represent to you that there</p> <p>12 were 250,000 comments and posts on Reddit just</p> <p>13 between May 2024 and February 2025, would that</p> <p>14 number surprise you?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: It wouldn't surprise me. I</p> <p>17 believe Reddit was the one that she scraped the most</p> <p>18 data from.</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q Okay. So how do you reconcile that you</p> <p>21 pulled 879 posts from a longer time period than</p> <p>22 Dr. Mayzlin's from a shorter time period?</p> <p>23 A Again she -- based on my recollection of</p> <p>24 her approach, she used an LLM to produce this</p> <p>25 information. So again, I tried to replicate it in</p>	<p style="text-align: right;">Page 292</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Okay. But 250,000 comments and posts is</p> <p>3 250,000 plus more than your entire dataset.</p> <p>4 MR. FRITZ: Objection.</p> <p>5 THE WITNESS: So again, quantity is not</p> <p>6 always a factor in accuracy or representation.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Right. But you did not do any analysis</p> <p>9 of Dr. Mayzlin's actual data to understand if it's</p> <p>10 representative, right?</p> <p>11 MR. FRITZ: Objection.</p> <p>12 THE WITNESS: I couldn't replicate what</p> <p>13 she developed in order to analyze it.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q But you didn't just look at the comments</p> <p>16 and do any of your own spot checking on the 250</p> <p>17 posts in her Reddit data?</p> <p>18 MR. FRITZ: Objection.</p> <p>19 THE WITNESS: No. Because that wasn't to</p> <p>20 my understanding my assignment.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q But it didn't strike you as a proffered</p> <p>23 expert in this case that, I don't know, 870 versus</p> <p>24 250, that seems a little off, maybe we should check?</p> <p>25 MR. FRITZ: Objection.</p>
<p style="text-align: right;">Page 291</p> <p>1 order to understand the post, the sentiment,</p> <p>2 et cetera. And I wasn't able to do that.</p> <p>3 Q Sorry. Go on.</p> <p>4 A Period. I will end there.</p> <p>5 Q But what I don't understand is why didn't</p> <p>6 you just look at the 250,000 posts and comments on</p> <p>7 Reddit and look at them and compare them with just</p> <p>8 the 879 in your dataset?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 THE WITNESS: Because I needed to</p> <p>11 understand the origins and verify the origins in</p> <p>12 order to do any subsequent analysis.</p> <p>13 I'm not able to verify where the data</p> <p>14 came from, from her dataset, based on the</p> <p>15 information I was given in her expert report. So</p> <p>16 alternatively, I went to pull a more diverse set of</p> <p>17 data across more networks in order to analyze it.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q I'm having trouble understanding how 879</p> <p>20 posts from Reddit is a greater set of data points</p> <p>21 than the 250,000 comments and posts in Dr. Mayzlin's</p> <p>22 Reddit dataset.</p> <p>23 MR. FRITZ: Objection.</p> <p>24 THE WITNESS: I refer to a larger number</p> <p>25 of social media sites for diversity.</p>	<p style="text-align: right;">Page 293</p> <p>1 THE WITNESS: No, it did not.</p> <p>2 BY MS. GOVERNSKI:</p> <p>3 Q Okay. It says:</p> <p>4 (As read):</p> <p>5 "September dropped back down to 25,</p> <p>6 (76 percent decline.)"</p> <p>7 Dropped down to 25 what?</p> <p>8 A Baseline period.</p> <p>9 (Witness reading.)</p> <p>10 So that's looking at volume.</p> <p>11 Q So in September, the posts dropped down</p> <p>12 to 25 posts?</p> <p>13 A Yes, based on this. So August was 175</p> <p>14 posts and we saw -- sorry -- a 76 percent decline in</p> <p>15 September down to 25 posts is what --</p> <p>16 Q Okay. So your conclusions about what the</p> <p>17 Reddit data showed after the August spike was based</p> <p>18 on 25 posts?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: I'm sorry. Can you just</p> <p>21 repeat the last question?</p> <p>22 BY MS. GOVERNSKI:</p> <p>23 Q Sure. Your opinion based on the Reddit</p> <p>24 dataset of what occurred after the August spike was</p> <p>25 based on 25 posts.</p>

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<p style="text-align: right;">Page 294</p> <p>1 A A piece of the analysis was based on 25 2 posts that month during that -- on Reddit. 3 Q Well, I'm talking about just Reddit. 4 So were there other posts other than the 5 25 mentioned here that you considered with respect 6 to Reddit? 7 A No. I would have to go into the dataset. 8 But it would be the amount in the file. 9 Q Okay. So under Results, it says: 10 (As read): 11 "Spike is real and statistically 12 significant." 13 Which refers to the August spike. "But" 14 in capital letters. 15 (As read): 16 "BUT the timing is right when the movie 17 came out (August 9th) and when the 18 alleged campaign started (August 2nd). 19 So can't really say which caused it 20 from temporal data alone." 21 That's an accurate statement, right? 22 A All right. Just one second. Yes. But 23 you would have to go on and read the results in its 24 entirety. 25 Q Okay. Well, it says:</p>	<p style="text-align: right;">Page 296</p> <p>1 materials -- materials referenced. 2 Q Okay. Do you have any personal knowledge 3 about whether or when -- sorry strike that. 4 Do you have any personal knowledge about 5 whether the alleged digital manipulation started on 6 August 2nd? 7 A Sorry. Did you say personal knowledge? 8 Q Yeah. 9 A No. 10 Q Do you have any knowledge generally based 11 on what you reviewed in this case? 12 A Maybe I don't understand what you're 13 asking. 14 Q Let me ask the question in a better way. 15 MR. FRITZ: Objection. 16 BY MS. GOVERNSKI: 17 Q Do you have any reason to believe that 18 the digital campaign started on August 2nd? 19 MR. FRITZ: Objection. 20 THE WITNESS: Based on the discovery 21 material I was given, the alleged campaign had a 22 date associated with it. And I believe that's where 23 I pulled the August 2nd date specifically. 24 BY MS. GOVERNSKI: 25 Q Okay. And what if it turned out that the</p>
<p style="text-align: right;">Page 295</p> <p>1 (As read): 2 "The fact it immediately crashed 3 76 percent in September suggests movie 4 hype more than sustained campaign. 5 Bots would be consistent over time." 6 Is that what you were referring to? 7 A Yes. And: 8 (As read): 9 "Activity patterns look normal. 10 79.5 percent weekday posting, natural 11 hourly curve - excuse me -- and doesn't 12 have the hallmark of coordinated 13 activity." 14 Q Okay. So the results for Reddit were 15 based on the about 60 posts for the baseline period 16 and 100 posts for August and 25 posts for September, 17 right? 18 A Yes. Based on the README, I would 19 probably go in and just double check the dataset. 20 But yes. 21 Q Okay. So this README says that the 22 alleged campaign started on August 2nd. What is 23 that based on? 24 A I'd have to check. But I believe that is 25 in the discovery materials that I referenced on</p>	<p style="text-align: right;">Page 297</p> <p>1 digital part of the campaign started after 2 August 2nd? 3 MR. FRITZ: Objection. 4 THE WITNESS: That would not change my 5 analysis. 6 BY MS. GOVERNSKI: 7 Q It wouldn't, say, if the campaign started 8 on August 9th as opposed to August 2nd, wouldn't 9 removing the data between August 2nd and August 9th 10 have an impact on your outcome? 11 MR. FRITZ: Objection. 12 THE WITNESS: I hate to answer a question 13 with a question but I guess my question would be why 14 would we remove the data between August 2nd and 15 August 9th? 16 BY MS. GOVERNSKI: 17 Q Well, if the campaign started August 9th, 18 wouldn't the period between August 2nd and 19 August 9th be part of the baseline? 20 A So there is a reason why I didn't include 21 August 1, for instance. And I wouldn't have 22 included August 8th if the assumption was it 23 started on the ninth. 24 So the baseline should be a period before 25 there is any alleged manipulation, before there is</p>

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<p style="text-align: right;">Page 298</p> <p>1 an actual launch of a movie. Whatever could 2 aggressively increase sentiment one way or the 3 other. Which is why I chose that for the baseline. 4 Q Right. So I mean your August spike is 5 only one month. So August 1st through ninth or 6 August 2nd through ninth is a whole week, right, 7 that's seven days? 8 A Yes. 9 MR. FRITZ: We'll stipulate to that. 10 BY MS. GOVERNSKI: 11 Q So your data about the August spike would 12 go from three weeks of data -- or from four weeks of 13 data to three weeks of data, right? 14 A No. 15 MR. FRITZ: Objection. 16 THE WITNESS: The spike itself is based 17 on just data. Based on what happened in real life. 18 So there was a spike in sentiment, in overall 19 volume. Just overall. So the spike happened 20 irrespective of if it was a marketing campaign, 21 despite whatever caused it. The spike still 22 occurred. 23 BY MS. GOVERNSKI: 24 Q So why would the period from August 2nd 25 to August 9th not be included in the baseline?</p>	<p style="text-align: right;">Page 300</p> <p>1 increased. I believe I gave a date in the report. 2 BY MS. GOVERNSKI: 3 Q Okay. And you said that in your report 4 that you used the Reddit scraper actor, right? 5 A Yes. The API. 6 Q Okay. The Reddit scraper actor does not 7 allow users to perform searches. 8 Are you aware of that? 9 MR. FRITZ: Objection. 10 THE WITNESS: So in Apify, you are able 11 to pull Reddit based on keywords. 12 MS. GOVERNSKI: Let's pull up what will 13 be Exhibit 17. 14 (Exhibit 17 marked for identification.) 15 MS. ADAMS-JACK: Which document, Meryl? 16 MS. GOVERNSKI: The Reddit scraper actor. 17 While we're here, let's go into the README where it 18 says -- sorry, Autumn, while you're pulling that up, 19 can you scroll down to the bottom of this? 20 BY MS. GOVERNSKI: 21 Q Okay. It says: 22 (As read): 23 "Reddit API pulls for Blake Lively, It 24 Ends With Us, Justin Baldoni, top subs, 25 pop-culture chat, 265 posts, Fauxmoi,</p>
<p style="text-align: right;">Page 299</p> <p>1 MR. FRITZ: Objection. 2 THE WITNESS: I wouldn't include it in 3 the baseline because I would end the baseline at a 4 month -- a month outside of where we see an 5 effective month. So you would want ideally several 6 months of -- I don't want to say clean -- several 7 months of un-destructive data as much as you can 8 isolate those factors. 9 BY MS. GOVERNSKI: 10 Q So if the campaign started August 28th, 11 would you include all of August in the spike? 12 A So irrespective of the alleged campaign, 13 irrespective of -- a spike occurred in August 14 outside of causation. So I took the baseline as the 15 months previous to that spike in order to develop a 16 baseline. 17 Q So you don't know or can't say one way or 18 the other whether the spike started the first week 19 in August or the second week of August? 20 You just didn't look at that, right? 21 MR. FRITZ: Objection. 22 THE WITNESS: I had daily data but the 23 spike in general was in August and it's -- I think I 24 specify in the report when the spike, when the spike 25 occurred, when we saw the data, when volume</p>	<p style="text-align: right;">Page 301</p> <p>1 189 posts, Romance books, 154." 2 Do you see that? 3 A Yes. 4 Q Are you aware that 265 plus 189 plus 154 5 adds up to 608. Maybe. 6 MS. GOVERNSKI: Kevin, you can stipulate 7 that. 8 MR. FRITZ: Not without a calculator. 9 BY MS. GOVERNSKI: 10 Q I can represent to you they add up to 11 608. So I'm trying to understand are 608 of your 12 Reddit -- of the data in the Reddit dataset from 13 those three top subs? 14 A I'm not sure. The question is -- is it 15 from Blake Lively, It Ends with Us, Justin Baldoni? 16 Q No. You see it says "top subs", right? 17 A Yes. 18 Q What are top subs? 19 A Top subs are the higher volume subs 20 across Reddit. 21 Q And subs are subReddits? 22 A Yes. That's how Reddit refers to them. 23 Q Okay. So when you resisted using that 24 term earlier, and you instead said subcategories, do 25 they mean the same thing?</p>

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<p style="text-align: right;">Page 302</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: So subsections, I believe,</p> <p>3 is a more general use of looking at groups or</p> <p>4 sections across websites. SubReddits is very</p> <p>5 specific in someone understanding and knowing the</p> <p>6 architecture of Reddit.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q When you recall that we actually looked</p> <p>9 at posts from pop -- sub Reddit called pop culture</p> <p>10 chat and from FauxMoi, right?</p> <p>11 A From pop culture chat, yes. I don't</p> <p>12 remember the FauxMoi.</p> <p>13 Q Do you remember the Kurt Cobain one?</p> <p>14 A Yes.</p> <p>15 Q So 608 of the Reddit posts in your</p> <p>16 dataset were from these three subReddits, right?</p> <p>17 A Top subs, yes. So 265 posts, 189, and</p> <p>18 154.</p> <p>19 Q Okay. And then it says Reddit API pulls.</p> <p>20 You didn't list Reddit API in your data sources.</p> <p>21 Why not?</p> <p>22 A So we didn't use the Reddit API pulls.</p> <p>23 We used the Apify -- excuse me -- Apify Reddit pull.</p> <p>24 Q Let's -- now the exhibit should be in</p> <p>25 there. Exhibit 17. The Reddit post scraper. You</p>	<p style="text-align: right;">Page 304</p> <p>1 Q Well, what are you double checking?</p> <p>2 A I am looking at the exhibit that you</p> <p>3 provided in the README files.</p> <p>4 Q In the README file where it says "top</p> <p>5 subs, pop culture, chat fauxmoi, and romance books"?</p> <p>6 A No. To see if we stated in the README</p> <p>7 file that there was any -- so that should have been</p> <p>8 left blank.</p> <p>9 Q Well, then how would you search?</p> <p>10 Because as we just looked at, this</p> <p>11 scraper requires you to either enter the subreddit</p> <p>12 or the username or the specific link or the</p> <p>13 homepage.</p> <p>14 MR. FRITZ: Objection.</p> <p>15 THE WITNESS: Here, we would have entered</p> <p>16 the homepage and the --</p> <p>17 BY MS. GOVERNSKI:</p> <p>18 Q I'm not asking what you would have done.</p> <p>19 What did you do?</p> <p>20 MR. FRITZ: Objection.</p> <p>21 THE WITNESS: So for this run, we would</p> <p>22 not have filled out any of the optional.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q What would you have filled out?</p> <p>25 Let's go back, Autumn, please to the</p>
<p style="text-align: right;">Page 303</p> <p>1 see it's Reddit scraper. Is this the API that you</p> <p>2 used?</p> <p>3 You can see in the bottom, it's</p> <p>4 Apify.com.</p> <p>5 A Yes. That should be the scraper.</p> <p>6 Q That you used?</p> <p>7 A Yes, I believe so.</p> <p>8 Q Okay. And you can see it says:</p> <p>9 (As read):</p> <p>10 "Fastest, the most affordable, and</p> <p>11 stable, doesn't need any login or</p> <p>12 authentication, scrapes data (detailed</p> <p>13 posts, comment with votes, media,</p> <p>14 links, and replies) from Reddit based</p> <p>15 on a provided subReddits, username,</p> <p>16 specific link, or the homepage, with an</p> <p>17 optional limit on the number of posts</p> <p>18 retrieved."</p> <p>19 Do you see that?</p> <p>20 A I do.</p> <p>21 Q So what subReddits did you enter here?</p> <p>22 A So the -- excuse me. So the subreddit is</p> <p>23 optional.</p> <p>24 Q What did you provide for this?</p> <p>25 A I do not -- let me just double check.</p>	<p style="text-align: right;">Page 305</p> <p>1 scraper that Ms. Alexander said she used, 17. Which</p> <p>2 says that it can provide these things based on a</p> <p>3 provided subreddit, username, specific link or the</p> <p>4 homepage. So you have to give one of them.</p> <p>5 A No. So one of the options when you go</p> <p>6 in, again, they are all optional. So we would have</p> <p>7 provided the keywords --</p> <p>8 Q Where on?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q Sorry. Go on.</p> <p>12 A We would have provided the keywords</p> <p>13 under, I believe it's under information.</p> <p>14 MS. GOVERNSKI: Okay. I actually have</p> <p>15 that. So let's go to the next Reddit scraper,</p> <p>16 Autumn.</p> <p>17 THE WITNESS: Sorry. This is on manual</p> <p>18 so I would just look at the Json. So if you would</p> <p>19 like, I can refer to the Json file.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Did you produce the Json file?</p> <p>22 A So that would have been part of</p> <p>23 assumingly the raw data or the script that Taylor</p> <p>24 used to fill this out.</p> <p>25 Q The script that Taylor used. Did you</p>

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<p style="text-align: right;">Page 306</p> <p>1 review the script that Taylor used?</p> <p>2 A The Json, no. I reviewed the python and</p> <p>3 the extracts.</p> <p>4 Q Okay. So you don't actually know what</p> <p>5 Taylor filled out to scrape Reddit?</p> <p>6 MR. FRITZ: Objection.</p> <p>7 THE WITNESS: I don't have the data</p> <p>8 readily available in front of me to reference.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q As you sit here today, you don't know</p> <p>11 what Ms. Hunter did to scrape Reddit?</p> <p>12 MR. FRITZ: Objection.</p> <p>13 THE WITNESS: I'm happy to reference it</p> <p>14 to provide an answer.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q Well, you don't provide an answer in your</p> <p>17 report, right?</p> <p>18 A The question isn't posed in my report.</p> <p>19 Q But describing how you identified the</p> <p>20 content on Reddit is not described in your report,</p> <p>21 other than saying that you used an Apify scraper?</p> <p>22 MR. FRITZ: Objection.</p> <p>23 THE WITNESS: That's what I provided in</p> <p>24 my report. Yes.</p> <p>25</p>	<p style="text-align: right;">Page 308</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: So in the README file, it's</p> <p>3 looking at showing where the greatest amount of</p> <p>4 volume came from and again, if those are the major</p> <p>5 subReddits, then that would take up a large amount</p> <p>6 of volume. Irrespective of the rest of Reddit.com.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q Okay. Well, let's look at your input.</p> <p>9 Let's mark as Exhibit 18 your Reddit input. Sorry.</p> <p>10 It was Exhibit 19, which is an Excel spreadsheet.</p> <p>11 By the way, who created the input</p> <p>12 spreadsheets?</p> <p>13 (Exhibit 19 marked for identification.)</p> <p>14 A Those were done by Taylor.</p> <p>15 Q Did you review them?</p> <p>16 A I looked through each of the Excels</p> <p>17 before submitting them.</p> <p>18 Q Okay. And so these input spreadsheets</p> <p>19 accurately reflect all of the data on which your</p> <p>20 opinions are based?</p> <p>21 MR. FRITZ: Objection.</p> <p>22 THE WITNESS: As a whole, it's based on</p> <p>23 all of the data that we collected and analyzed.</p> <p>24 BY MS. GOVERNSKI:</p> <p>25 Q Yeah, so all of the five input files that</p>
<p style="text-align: right;">Page 307</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q So Exhibit 18 is the information tab for</p> <p>3 the same Reddit scraper you can say it says based on</p> <p>4 a provided subreddit username specific link or the</p> <p>5 homepage and you see the specific input fields.</p> <p>6 The actor accepts the following input</p> <p>7 fields. If none are provided, it defaults to just</p> <p>8 scraping Reddit.com.</p> <p>9 (Exhibit 18 marked for identification.)</p> <p>10 A Yes. I see that. So you don't have to</p> <p>11 define an optional -- like I said, on the first</p> <p>12 page, they were all optional. So if you do not put</p> <p>13 a definition in, it scrapes Reddit as a whole.</p> <p>14 Q Okay. So your dataset scraped Reddit as</p> <p>15 a whole?</p> <p>16 A I can answer that definitively if I</p> <p>17 reference the Json file that she used.</p> <p>18 Q But the Json file --</p> <p>19 A Because we didn't specify any optional</p> <p>20 input in the README file, then I would say there</p> <p>21 were no optional inputs that were added.</p> <p>22 Q So was it just a coincidence that 608 of</p> <p>23 the items in your Reddit dataset are from those</p> <p>24 three specific subReddits identified in the README</p> <p>25 file?</p>	<p style="text-align: right;">Page 309</p> <p>1 comprise your entire dataset is what your opinions</p> <p>2 are based on, correct?</p> <p>3 A That is correct.</p> <p>4 Q Okay. So let's scroll down to row 161.</p> <p>5 I'm told that all this weird stuff on top is from</p> <p>6 the CSV file conversion to Excel.</p> <p>7 So if we go to 161, you see that this is</p> <p>8 a post from January 5th 2024, which is consistent</p> <p>9 with the README file explaining that the Reddit</p> <p>10 dataset started back in January, right?</p> <p>11 A So this is a time stamp of January 2024,</p> <p>12 yes, via Reddit.</p> <p>13 Q Okay. So that is consistent with the</p> <p>14 README file which said that the Reddit dataset</p> <p>15 collected content dating back to January 2024,</p> <p>16 right?</p> <p>17 A Yes. So the input date for Reddit should</p> <p>18 have started in January 2024. That was input.</p> <p>19 Q Okay. And if we go to column F, you see</p> <p>20 it says "pop culture chat", right?</p> <p>21 A I see that.</p> <p>22 Q Okay. And that's one of those subReddits</p> <p>23 that we talked about?</p> <p>24 A Yes. That's one of them.</p> <p>25 Q Okay. Can you look at the content and</p>

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<p style="text-align: right;">Page 310</p> <p>1 tell me how your BERT sentiment analyzer 2 characterized this post?</p> <p>3 A I would have to -- I don't want to make 4 an assumption. I would have to go back and look at 5 the score that was given.</p> <p>6 Q Okay. So we couldn't, based on this 7 data, know how your sentiment analyzer categorized 8 this post?</p> <p>9 MR. FRITZ: Objection.</p> <p>10 THE WITNESS: Unless you reproduced it in 11 the BERT classifier.</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q Okay. And if you scroll down. Let's 14 just, Autumn, scroll down to column F a little bit.</p> <p>15 We see movies, movies, romance books, 16 fauxmoi, movies, pop culture chat, pop culture chat, 17 romance books.</p> <p>18 So does this column, row F, adequately 19 capture the subReddits that are comprised in your 20 Reddit dataset?</p> <p>21 A This would pull from the subReddits, yes. 22 This would attach where the post pulled from across 23 Reddit.</p> <p>24 Q Okay. And we've already established that 25 608 of these posts in this column were from those</p>	<p style="text-align: right;">Page 312</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q And isn't the most logical conclusion 3 that you typed in -- or that Ms. Hunter typed in 4 these three subReddits into the scraper?</p> <p>5 MR. FRITZ: Objection.</p> <p>6 THE WITNESS: No, because I believe there 7 is data outside of the subReddits.</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q Right, but I'm talking about just the 608 10 within the subreddit.</p> <p>11 A I'm not sure I understand. You're asking 12 did she input into the optional field to identify 13 those specific subReddits?</p> <p>14 Q The specific subReddits that she noted in 15 her file that add up to 608 of the posts, isn't it 16 possible that she just searched those Reddits using 17 the data scraper we talked about?</p> <p>18 A If she only searched those, then you 19 wouldn't have data from any other section.</p> <p>20 Q Unless she did an additional search, 21 right, for that remaining 100 plus?</p> <p>22 A I don't believe that's what she did.</p> <p>23 Q But you don't know?</p> <p>24 MR. FRITZ: Objection.</p> <p>25 THE WITNESS: I would say with confidence</p>
<p style="text-align: right;">Page 311</p> <p>1 three subReddits that we identified in the README 2 file, right?</p> <p>3 A Yes. From a volume perspective. Yes.</p> <p>4 Q And you don't really know why the scraper 5 pulled 608 items specifically from those three 6 subReddits, right?</p> <p>7 A I would guess that it was because the 8 keywords were relevant or the content somehow was 9 relevant based on, again, Blake Lively, 10 It Ends with Us, and the other keywords that I 11 specify in the report.</p> <p>12 Q Well, why do you have to guess?</p> <p>13 A Because I didn't write the code for the 14 scraper.</p> <p>15 Q So we would have to ask Ms. Hunter to 16 really understand how you identified your dataset?</p> <p>17 MR. FRITZ: Objection.</p> <p>18 THE WITNESS: No, I'm not the one who 19 wrote the API, for instance, for Reddit because the 20 question, I believe, was why did it pull this 21 particular data. So that wouldn't be necessarily on 22 the README file. That would also be on how the 23 scraper itself is -- or how API is used across 24 Reddit. 25</p>	<p style="text-align: right;">Page 313</p> <p>1 that that is not -- not how she utilized the 2 scraper.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q But as you sit here today, you can't tell 5 us what she did to utilize the scraper.</p> <p>6 MR. FRITZ: Objection.</p> <p>7 THE WITNESS: I did not give her any 8 direction to add in optional fields, so I do not 9 believe that she took it on her own onus to add in 10 subreddit classifiers into fields that were 11 optional.</p> <p>12 BY MS. GOVERNSKI:</p> <p>13 Q But how do you explain that the API 14 scraper that you used specifically does not 15 contemplate entering search terms?</p> <p>16 MR. FRITZ: Objection.</p> <p>17 THE WITNESS: So the subReddits, or the 18 categories that are the largest across any social 19 media platform, will be ones that come back most 20 often with data, especially if the information is 21 relevant to that particular genre, classification, 22 subreddit.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q Okay. Let's go to row 225. And sorry -- 25 oh, no. Sorry. 227. You see the post "Frances</p>

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<p style="text-align: right;">Page 314</p> <p>1 Bean Cobain Pays Tribute to Her father, Kurt Cobain, 2 30 years After His Death," and in column F it's 3 FauxMoi. 4 Do you see that? 5 A Yes, I'm on that row. 6 Q Okay. And that's the post we looked at 7 earlier, right? 8 A It has the same title, yes. 9 Q Okay. And the same subreddit, FauxMoi? 10 A Yes. 11 Q Okay. So how did your BERT sentiment 12 analyzer characterize this post? 13 MR. FRITZ: Objection. 14 THE WITNESS: So I think -- you asked me 15 that question when we were looking at the actual 16 image. So again, I would say it should have 17 classified it as null or neutral. 18 BY MS. GOVERNSKI: 19 Q Okay. So how many of the posts in this 20 dataset should have been qualified as null or 21 neutral? 22 A I would have to go through and look at 23 them individually to see which ones would be 24 classified as positive sentiment, negative 25 sentiment, null, or neutral.</p>	<p style="text-align: right;">Page 316</p> <p>1 that's global or U.S. 2 BY MS. GOVERNSKI: 3 Q But it doesn't sound crazy to you that 4 there would be tens of millions of TikTok videos 5 every day posted? 6 A No, that sounds rational. 7 Q Okay. Exhibit 20 is your -- the TikTok 8 README file. Do you see that on your screen? 9 A Yes. 10 Q Okay. And you see it says "Analysis of 11 Blake Lively TikTok videos, 688 videos total from 12 the dataset." 13 Is that right -- is that right? 14 A Sorry, just give me a second. 15 August 27th, I believe that's correct. 16 Q Okay. So when you look at what it 17 calculates, you see the baseline period mean about 18 eleven videos per month; is that right? Is that 19 accurate? 20 MR. FRITZ: Objection. 21 THE WITNESS: I'd want to go into the 22 dataset to just confirm, but that's what this reads, 23 yes. 24 BY MS. GOVERNSKI: 25 Q Okay. But we talked about earlier that</p>
<p style="text-align: right;">Page 315</p> <p>1 Q Okay. From this, we wouldn't be able to 2 determine these things? 3 A On how the classifier would classify it, 4 no, we're not able to tell based on this. 5 MS. GOVERNSKI: Let's -- Autumn, if you 6 can move the TikTok README and we will mark that as 7 Exhibit 20. 8 (Exhibit 20 marked for identification.) 9 BY MS. GOVERNSKI: 10 Q Do you know, Ms. Alexander, how many 11 videos are on TikTok every month? 12 A In TikTok? 13 Q Uh-huh. 14 A I don't know offhand, no. 15 Q What about every day? 16 A I don't know offhand. 17 Q Ballpark? 18 MR. FRITZ: Objection. 19 THE WITNESS: I couldn't even venture to 20 guess. 21 BY MS. GOVERNSKI: 22 Q Does 34 million sound like maybe around 23 what you would expect? 24 MR. FRITZ: Objection. 25 THE WITNESS: I guess it would depend if</p>	<p style="text-align: right;">Page 317</p> <p>1 you would have confirmed the accuracy of the README 2 files before you produced them to us, right? 3 A I would have gone through and README each 4 of the README me files. 5 Q So this README file says that there were 6 eleven videos per month, which is about 33 videos 7 from May to July 2024; is that right? 8 A That's what this says, yes. 9 Q Okay. And it says the August spike is 10 187 videos, right? 11 A It does. 12 Q Okay. So your analysis of the August 13 spike, with respect to TikTok, was based on 187 14 videos? 15 A That's what this says. Again, I would 16 want to check the data. 17 Q Okay. We'll do that. And then September 18 dropped to 31, right? 19 A Based on this read my file, yes. 20 Q Okay. And then the -- in the results, 21 the results in the README file would be based on the 22 other data described in the README file, right? 23 A I'm not sure I understand the question. 24 Q I mean, the results here are based on the 25 number of posts it describes that we just discussed,</p>

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<p style="text-align: right;">Page 318</p> <p>1 right?</p> <p>2 A So --</p> <p>3 MR. FRITZ: Objection.</p> <p>4 THE WITNESS: -- again, I would want to</p> <p>5 go in and just double check that the -- that the</p> <p>6 total numbers are, indeed, accurate. But the</p> <p>7 results should be consistent with what I have in my</p> <p>8 report.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q And the comment that:</p> <p>11 (As read):</p> <p>12 "The same timing issue as to all</p> <p>13 platforms: Movie came out August 9th,</p> <p>14 alleged campaign, August 2nd, can't say</p> <p>15 what caused it from timing alone"</p> <p>16 Is still your opinion, right?</p> <p>17 A Yes, again, going back to use of the word</p> <p>18 "definitive" that we talked about earlier.</p> <p>19 Q Okay. So you -- but they don't use the</p> <p>20 word -- she doesn't use the word "definitive" here,</p> <p>21 right?</p> <p>22 A I believe I use it in my report.</p> <p>23 Q Right. But not it's not in the README</p> <p>24 file, right?</p> <p>25 MR. FRITZ: Objection.</p>	<p style="text-align: right;">Page 320</p> <p>1 refresh your recollection. If you can put it on the</p> <p>2 screen on page 109. Okay. You see it says "Apify</p> <p>3 TikTok hashtag crawler actor."</p> <p>4 Do you see that?</p> <p>5 A Oh, so if that's the way I identified it</p> <p>6 there, then I'm assuming that is the way it is -- it</p> <p>7 has named itself, yes.</p> <p>8 Q Well, why are you assuming if you put it</p> <p>9 in your appendix?</p> <p>10 A So if that's the way that it is</p> <p>11 described, then when I use it in sourcing, I use the</p> <p>12 verbiage of what it is called.</p> <p>13 Q Okay. And do you understand that TikTok</p> <p>14 hashtag scraper allows you to extract data from</p> <p>15 TikTok videos that used a particular hashtag?</p> <p>16 A Yes.</p> <p>17 Q So what specific hashtags did you use?</p> <p>18 A So you don't have to specify a hashtag,</p> <p>19 just to be clear. You can use keywords in that</p> <p>20 scraper as well.</p> <p>21 MS. GOVERNSKI: Okay. Well, let's take a</p> <p>22 look at that scraper. Actually, before we do, the</p> <p>23 TikTok hashtag scraper is called TikTok hashtag</p> <p>24 crawler actor. Okay. Let's look at Exhibit 21.</p> <p>25 And Autumn, go ahead and do Exhibit 22 as the TikTok</p>
<p style="text-align: right;">Page 319</p> <p>1 THE WITNESS: The README file was written</p> <p>2 by Taylor Hunter, the report was written by myself.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Oh, so do you not stand behind</p> <p>5 Ms. Hunter's work as described in the README files?</p> <p>6 MR. FRITZ: Objection.</p> <p>7 THE WITNESS: I use different verbiage,</p> <p>8 based on, again, analyzing and doing the</p> <p>9 interpretation of the data. That's why I am the end</p> <p>10 publisher of the report. This is information that</p> <p>11 Taylor is feeding in based on her analysis,</p> <p>12 aggregation, and pulling of the datasets.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q But you didn't make any edits to her</p> <p>15 comments in the README file, right?</p> <p>16 A No, I did not.</p> <p>17 Q And you used a TikTok hashtag crawler</p> <p>18 actor, right?</p> <p>19 A I'm sorry. A hashtag crawler actor?</p> <p>20 Q Uh-huh.</p> <p>21 A So it was the actor for the API for</p> <p>22 TikTok, I don't believe it actually calls itself a</p> <p>23 crawler. I don't remember that verbiage in the way</p> <p>24 that it's --</p> <p>25 Q Okay. Let's look at your report to</p>	<p style="text-align: right;">Page 321</p> <p>1 input.</p> <p>2 (Exhibit 21 marked for identification.)</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q You should have Exhibit 21 in your</p> <p>5 Exhibit Share. We will put it in up on screen.</p> <p>6 You see this is Apify TikTok hashtag</p> <p>7 scraper, right?</p> <p>8 A Yes.</p> <p>9 Q It says:</p> <p>10 (As read):</p> <p>11 "What is TikTok Hashtag Scraper. It's</p> <p>12 a . . . powerful tool that allows you to</p> <p>13 extract data from TikTok videos that</p> <p>14 use a particular hashtag."</p> <p>15 Do you see that?</p> <p>16 A Yes, I'm reading it.</p> <p>17 Q Okay. And then if you look, it provides</p> <p>18 how to scrape TikTok with the TikTok hashtag</p> <p>19 scraper. And it has five specific points. The</p> <p>20 third of one, says "Add one or more TikTok</p> <p>21 hashtags."</p> <p>22 Do you see that?</p> <p>23 A Yes, I do.</p> <p>24 Q So what hashtags did you use to scrape</p> <p>25 TikTok?</p>

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<p style="text-align: right;">Page 322</p> <p>1 A So we would not have used hashtags. So I</p> <p>2 would have to go back into the dataset to see if</p> <p>3 this is the appropriate scraper or if it's a</p> <p>4 different one.</p> <p>5 Q So when you listed a TikTok hashtag</p> <p>6 crawler, it's your testimony that you did not</p> <p>7 actually ask it to crawl certain hashtags?</p> <p>8 MR. FRITZ: Objection.</p> <p>9 THE WITNESS: No. So hashtags -- some</p> <p>10 hashtags came with the data, but the point of the</p> <p>11 data analysis was not to specify a hashtag, so it</p> <p>12 shouldn't have been this particular scraper.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q How would I determine what scraper you</p> <p>15 used if it's not the scraper that you listed in your</p> <p>16 materials?</p> <p>17 A So I would have to check the output data,</p> <p>18 but we did not use a hash -- we did not use</p> <p>19 hashtags. We identified the keywords that I</p> <p>20 mentioned in my report. So it would have to be a</p> <p>21 scraper that was not hashtag only.</p> <p>22 MS. GOVERNSKI: Okay. So let's go to</p> <p>23 Exhibit 22, which is your TikTok input data. And</p> <p>24 we'll mark this as Exhibit 22.</p> <p>25 (Exhibit 22 marked for identification.)</p>	<p style="text-align: right;">Page 324</p> <p>1 Q Okay. Let's go to 31 and 32. These are</p> <p>2 the same two, right, as each other?</p> <p>3 A Yes.</p> <p>4 Q Do you have any idea of how many of the</p> <p>5 entries in your TikTok data are actually duplicates?</p> <p>6 A I don't know.</p> <p>7 Q Isn't it important for you to know that?</p> <p>8 MR. FRITZ: Objection.</p> <p>9 THE WITNESS: It's not necessarily</p> <p>10 important. Because again, as I'm pulling them from</p> <p>11 the scraper -- or from the API, TikTok is looking at</p> <p>12 these as individual entries, which is why they are</p> <p>13 on individual rows, assuming on the conversion</p> <p>14 process from the file that I submitted. So they may</p> <p>15 be duplicative, but if you were to back out why they</p> <p>16 show up twice, the assumption is they would show up</p> <p>17 twice on two different accounts.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Okay. So let's assume, hypothetically,</p> <p>20 that every single one of your TikTok videos is in</p> <p>21 here twice, that would mean that your dataset of</p> <p>22 TikTok videos is not actually 688, it's 688 divided</p> <p>23 by two, right?</p> <p>24 A Based on the assumption that you just</p> <p>25 outlined?</p>
<p style="text-align: right;">Page 323</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q Okay. Let's -- well, I don't know, let's</p> <p>3 look at rows 3 and 4. That looks like the exact</p> <p>4 same post, right?</p> <p>5 A Rows 3 and 4?</p> <p>6 Q Uh-huh.</p> <p>7 A Yes.</p> <p>8 Q Why does your data include two of the</p> <p>9 same posts?</p> <p>10 A Let's look at the time stamp.</p> <p>11 Q Let's scroll over. We can look at all</p> <p>12 the columns to see that they are all the same.</p> <p>13 A I'm not sure why there's duplicate, but</p> <p>14 it could be from translation, it could be from --</p> <p>15 I'm not sure --</p> <p>16 Q Okay.</p> <p>17 A -- each post should be a unique post.</p> <p>18 Q It should be. Why is that?</p> <p>19 A So again, it may be a unique post. It</p> <p>20 may be an identical post so it could have been from</p> <p>21 two different --</p> <p>22 (Witness reading.)</p> <p>23 I don't see any differentiation across</p> <p>24 any of the columns, so I'm not sure why it shows up</p> <p>25 twice.</p>	<p style="text-align: right;">Page 325</p> <p>1 Q Yup.</p> <p>2 A Based on your assumption, that's one way</p> <p>3 of calculating, yes.</p> <p>4 MS. GOVERNSKI: Okay. Let's go to what</p> <p>5 we will mark as Exhibit 23, which will be the</p> <p>6 YouTube README.</p> <p>7 (Exhibit 23 marked for identification.)</p> <p>8 BY MS. GOVERNSKI:</p> <p>9 Q You should have Exhibit 23 now.</p> <p>10 A Yes.</p> <p>11 Q And you see that this says "16,337</p> <p>12 comments."</p> <p>13 Do you see that?</p> <p>14 A 1,789 comments?</p> <p>15 Q 16,337 comments, right?</p> <p>16 A This is YouTube analysis?</p> <p>17 Q YouTube analysis, on the screen.</p> <p>18 A Oh, at the top, it says 16,337. Yes.</p> <p>19 Q Okay. That says "comments," not videos,</p> <p>20 right?</p> <p>21 A This says "comments," yes.</p> <p>22 Q So your YouTube analysis looked only at</p> <p>23 comments?</p> <p>24 A I would have to go back into the data,</p> <p>25 but to see how -- how it was collapsed. So if it</p>

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<p style="text-align: right;">Page 326</p> <p>1 looked at comments only, or if each line had a 2 comment, along with any additional metadata or data 3 from the videos. 4 Q But that would be in your input files, 5 right? 6 A No, not necessarily. 7 Q What do you mean? 8 A So if I classify something as a post on 9 Instagram, you can interpret that as one post, or as 10 some of the images that you showed me, there was one 11 post but there were multiple frames that you have to 12 analyze. So depending how the data -- what is able 13 to be extracted with the data, it could show 14 information for that one Instagram post that you 15 show. But as I mentioned, there were like five 16 different tabs. So it could also give information 17 for those different tabs. 18 Q So that wouldn't be in the Excels that 19 you produced to us? 20 A No, it should. If it was available, it 21 should. 22 Q So that was my question. If you pulled 23 more than the comments, that would be reflected in 24 the input Excel that you provided us. 25 A In the dataset, yes.</p>	<p style="text-align: right;">Page 328</p> <p>1 explanation." 2 Do you see that? 3 A I do. 4 Q Is that your opinion or is that 5 Ms. Hunter's opinion? 6 MR. FRITZ: Objection. 7 THE WITNESS: So that is an inference 8 that Ms. Hunter made. It is an inference that I've 9 also made in addition to that. 10 BY MS. GOVERNSKI: 11 Q Okay. So what is your basis for 12 understanding that spikes in January and February 13 and October were related to newsworthy events? 14 A So based on the data, we saw that there 15 was the spike initially in August. And then in 16 December, around the time of filing the lawsuit, 17 there was additional spike. 18 Q So you didn't consider any other events 19 that occurred in December that could have caused 20 that spike? 21 A I didn't see -- I didn't find any other 22 data that highlighted other key news cycles that 23 would be able to be considered. 24 Q In the dataset, in your dataset, right? 25 A Correct.</p>
<p style="text-align: right;">Page 327</p> <p>1 Q Okay. And if -- let's go down to 2 results. Well, actually, we can start with what it 3 calculates. It shows 85 comments per month for the 4 May to July. 1789 comments for August. And 445 for 5 September. Do you have any reason to think that 6 those numbers are inaccurate? 7 A No, I don't believe they are. I believe 8 they are accurate. 9 Q Okay. And then in results, it again says 10 "spike is absolutely massive." And in the second 11 paragraph, it says: 12 (As read): 13 "Same timing issue as all other 14 platforms - movie came out August 9, 15 alleged campaign August 2. Can't 16 definitively say which caused it." 17 Right? 18 A Yes, I'm reading that. 19 Q Then is says: 20 (As read): 21 "Then there were additional spikes in 22 January/February (when lawsuit was 23 filed) and October 2025 - which shows 24 that volume correlates with newsworthy 25 events, supporting organic</p>	<p style="text-align: right;">Page 329</p> <p>1 Q You didn't go out and look for other 2 explanations? 3 A No, I didn't actively look at 4 macroeconomic factors. 5 MS. GOVERNSKI: Okay. Let's look at the 6 input for your YouTube, which should be Exhibit 24. 7 (Exhibit 24 marked for identification.) 8 BY MS. GOVERNSKI: 9 Q This is your underlying YouTube data, 10 right? 11 A Yes, this looks like the CSV. 12 Q Okay. And so column B shows the time 13 stamp, you see it starts with May 16, right? 14 A Yup. 15 Q Okay. And let's go over to column I, you 16 see "search term," so that reflects the search terms 17 that you used in YouTube, right? 18 A That is the search term that is used with 19 the scraper, yes. 20 Q Yeah, so why -- well, a scraper, you 21 didn't use a scraper, you used the YouTube data API, 22 right? 23 A With the API. 24 Q Okay. So why does this spreadsheet have 25 a search term and your other spreadsheets don't?</p>

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<p style="text-align: right;">Page 330</p> <p>1 A It would be the way we were able to 2 extract the file itself.</p> <p>3 Q So if you didn't actually use search 4 terms with the other scrapers, could that also be an 5 explanation of why there is not a column that says 6 "search terms"?</p> <p>7 A No, the output of the files is dependent 8 on the parameters that either a scraper or an API 9 gives you back. So you wouldn't add or remove 10 anything.</p> <p>11 Q So if we go to -- there is video ID 12 column, column F and a title of the video in J.</p> <p>13 Do you see that?</p> <p>14 A Column F, yes --</p> <p>15 Q And J.</p> <p>16 Do you see that?</p> <p>17 A Yes.</p> <p>18 Q Okay. And you see the video title for -- 19 gosh, everything on screen right now is 20 It Ends with Us official trailer, right?</p> <p>21 A For video title, yes.</p> <p>22 Q Yeah. So who picked this video?</p> <p>23 A I'm not sure what you mean "who picked 24 the video."</p> <p>25 Q Well, who picked to analyze this video?</p>	<p style="text-align: right;">Page 332</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: So we collected what was 3 available via the keywords that we entered and the 4 time frame. This is the dataset that was given back 5 from the API.</p> <p>6 MS. GOVERNSKI: Okay. Autumn, let's get 7 Exhibit 25, which is the post that matches what we 8 just looked at, the It Ends with Us trailer. 9 (Exhibit 25 marked for identification.)</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q And how many comments do you see in this 12 document?</p> <p>13 A In total -- let's see, 8,582 comments.</p> <p>14 Q Okay. So why does your dataset only 15 include 200 of them?</p> <p>16 A There's -- one of the possible reasons is 17 because there is a maximum amount of comments that 18 are available via the API. I'd have to go back to 19 YouTube's API to just double check that. But 20 there's usually a maximum. It could also mean that, 21 at the time, that was all that was available. I 22 mean, I'm not sure of the specific reason why.</p> <p>23 Q That's a pretty big difference between 24 208,000. Wouldn't that be important for you to 25 understand?</p>
<p style="text-align: right;">Page 331</p> <p>1 A So all of this data came back based on 2 the keywords and the time that we provided to 3 YouTube's API.</p> <p>4 MS. GOVERNSKI: So Autumn, can you copy 5 the video ID here? The Dlet_U31, can you copy that? 6 And then can you do a filter for that? If you go to 7 the -- yeah, perfect. Oh, no. You just took it 8 away. Thank you. And go to video ID, and let's 9 look for that one. Autumn, if you just go -- wait, 10 Autumn. Can you just -- go to -- go out of this. 11 Just go to the top -- the arrow, the arrow on F, on 12 F, the arrow on F. Right there and paste it right 13 here under "search." Okay? And then do "okay."</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q So do you see on the bottom left, 16 Ms. Alexander, it's 200 of 16,337 records?</p> <p>17 A 200 -- yes, I see that.</p> <p>18 Q So why are there exactly 200 comments to 19 this trailer?</p> <p>20 MR. FRITZ: Objection.</p> <p>21 THE WITNESS: I wouldn't know why there 22 is 200 comments on a trailer.</p> <p>23 BY MS. GOVERNSKI:</p> <p>24 Q Do you know whether you could have 25 collected all of the comments to this trailer?</p>	<p style="text-align: right;">Page 333</p> <p>1 MR. FRITZ: Objection.</p> <p>2 THE WITNESS: So it wouldn't if the 200 3 is a randomized sample of the 8,352.</p> <p>4 BY MS. GOVERNSKI:</p> <p>5 Q Well, how do you know whether the 200 is 6 an accurate sample of the 8,000 posts?</p> <p>7 A All I can say is that based on the API, 8 that is the data that we would have received from -- 9 from scraping or from providing those keywords. So 10 I would assume that there is a maximum. I would 11 have to go into -- I'm not as familiar with 12 YouTube's API, I would have to confirm and why it 13 would cut off. But the likely assumption is that 14 there are sometimes maximum amounts of downloads 15 that you could get. And I'm assuming it was cut off 16 at 200, which is why it's a specific number.</p> <p>17 Q Well, I don't understand why you have to 18 assume that if this is your report and your search.</p> <p>19 MR. FRITZ: Objection.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q Why don't you know whether the API that 22 you used was capped at 200 comments?</p> <p>23 A That's not readily -- that's not 24 knowledge I readily have available.</p> <p>25 Q Who would have that my knowledge readily</p>

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<p style="text-align: right;">Page 334</p> <p>1 available?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q Ms. Hunter?</p> <p>5 A Google -- no, Google.</p> <p>6 Q Okay.</p> <p>7 A YouTube.</p> <p>8 Q And you didn't think it was important for</p> <p>9 you to understand that.</p> <p>10 MR. FRITZ: Objection.</p> <p>11 THE WITNESS: I don't think that it would</p> <p>12 change the analysis.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q Okay. Are you aware of how many people</p> <p>15 viewed this trailer? Are you aware when the trailer</p> <p>16 came out?</p> <p>17 A No, no.</p> <p>18 Q Are you aware that the trailer came out</p> <p>19 during the baseline period?</p> <p>20 A I wasn't until you just mentioned it.</p> <p>21 Q Wouldn't that affect your analysis of</p> <p>22 what the appropriate baseline period is?</p> <p>23 A It could have an effect, yes. It would</p> <p>24 actually make the baseline higher.</p> <p>25 Q Wouldn't the baseline need to come from a</p>	<p style="text-align: right;">Page 336</p> <p>1 was: These are exact duplicates, right?</p> <p>2 MR. FRITZ: Okay. You can answer that.</p> <p>3 THE WITNESS: I don't know if they are</p> <p>4 exact duplicates. I will say the content appears to</p> <p>5 be the same. There could be different reasons for</p> <p>6 that. It could be the same user posted twice.</p> <p>7 There could be -- I don't know possibly other</p> <p>8 reasons.</p> <p>9 BY MS. GOVERNSKI:</p> <p>10 Q Okay. But posted twice at the exact same</p> <p>11 time?</p> <p>12 A I'm not sure what caused this.</p> <p>13 Q And do you know how many pieces of data</p> <p>14 in this YouTube dataset reflect duplicates?</p> <p>15 A I do not.</p> <p>16 Q Okay. Let's go to row 344, which is from</p> <p>17 August 9th. And you start seeing comments saying:</p> <p>18 (As read):</p> <p>19 "Justin Baldoni is a huge part of this</p> <p>20 movie and deserves to promote it as</p> <p>21 much as Blake Lively does."</p> <p>22 Do you see that? We can expand this so</p> <p>23 you can see it.</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 335</p> <p>1 period that didn't include a film-related event?</p> <p>2 MR. FRITZ: Objection.</p> <p>3 THE WITNESS: Not necessarily. So</p> <p>4 ideally, a baseline should be of a non-statistically</p> <p>5 significant news cycle or period of time without any</p> <p>6 large media cycles. So if, as you said, this came</p> <p>7 out during that period of the baseline, that would</p> <p>8 actually increase, assumingly, my overall baseline</p> <p>9 and not lower it. Which would then mean the spike,</p> <p>10 subsequently -- again, assumptions -- that the spike</p> <p>11 subsequently wasn't as high from the baseline as I</p> <p>12 originally thought.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q Okay. Let's look back at the YouTube</p> <p>15 rows 2 through 7, you see rows 2 and 3, 4 and 5, 6</p> <p>16 and 7, 8 and 9, 10 and 11, 12 and 13, I mean, all</p> <p>17 the way down, they're exact duplicates, right, they</p> <p>18 are counted twice?</p> <p>19 MR. FRITZ: Objection.</p> <p>20 THE WITNESS: So duplicate -- so I just</p> <p>21 want to clarify.</p> <p>22 MR. FRITZ: I don't think there is a</p> <p>23 question pending.</p> <p>24 So just note my objection.</p> <p>25 MS. GOVERNSKI: There was. My question</p>	<p style="text-align: right;">Page 337</p> <p>1 Q How would your sentiment analysis --</p> <p>2 actually, Ms. Lively's name doesn't appear in this.</p> <p>3 Oh, yes, it does.</p> <p>4 Okay. "As much as Blake Lively does." so</p> <p>5 how did your sentiment analyzer categorize this</p> <p>6 text -- I mean this post?</p> <p>7 A I would have to go back and refer to the</p> <p>8 number that it gave this post.</p> <p>9 Q Okay. Let's go to row 353. And it says:</p> <p>10 (As read):</p> <p>11 "Justin deserves more spotlight."</p> <p>12 How -- Ms. Lively is not mentioned in</p> <p>13 that post, how would your analyzer categorize this</p> <p>14 statement?</p> <p>15 MR. FRITZ: Objection.</p> <p>16 THE WITNESS: The classifier should put</p> <p>17 that in either null or neutral.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q Okay. How many of the posts that we're</p> <p>20 looking at here, in your YouTube data, should have</p> <p>21 been classified as null or neutral?</p> <p>22 A I can't answer that just offhand. I'd</p> <p>23 have to go into the data to look.</p> <p>24 Q The data that you didn't provide us?</p> <p>25 A Or this data specifically, and go through</p>

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<p style="text-align: right;">Page 338</p> <p>1 each one.</p> <p>2 Q Okay. Well, let's do that. How do you</p> <p>3 know how this one was categorized?</p> <p>4 A So I could replicate that, as you could,</p> <p>5 by putting the data into the classifier that's</p> <p>6 accessible and seeing the output on what the score</p> <p>7 is.</p> <p>8 Q Was this one of the posts that you</p> <p>9 manually checked?</p> <p>10 A I do not know.</p> <p>11 MS. GOVERNSKI: Okay. I think we can</p> <p>12 pause right now. I'd like to go off the record.</p> <p>13 THE VIDEOGRAPHER: We're off the record.</p> <p>14 MS. GOVERNSKI: John, can you tell me how</p> <p>15 much time we've been on the record?</p> <p>16 THE VIDEOGRAPHER: Sure. Off the record.</p> <p>17 It's 7:42 p.m.</p> <p>18 (Recess).</p> <p>19 THE VIDEOGRAPHER: We're back on the</p> <p>20 record. It's 7:49 p.m.</p> <p>21 BY MS. GOVERNSKI:</p> <p>22 Q Ms. Alexander, you create -- your report</p> <p>23 says you performed a network structure analysis; is</p> <p>24 that right?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 340</p> <p>1 A I would have to check the data file -- I</p> <p>2 mean, sorry. The data folder itself. If they are</p> <p>3 not in there, to caveat, that's not necessary to</p> <p>4 reproduce it.</p> <p>5 Q So how would we know what nodes you used?</p> <p>6 A So unless I'm fine-tuning the nodes</p> <p>7 themselves, you can use any nodes outside of Google</p> <p>8 or any other third party in order to look at a</p> <p>9 similar analysis.</p> <p>10 Q And what are your edges?</p> <p>11 A I don't know without looking.</p> <p>12 Q Okay. So you wouldn't know unless you</p> <p>13 looked at the data?</p> <p>14 A Correct.</p> <p>15 Q Okay. And you conducted a time series</p> <p>16 forecasting, right?</p> <p>17 A That's in the report, yes.</p> <p>18 Q But you didn't use your BERT sentiment</p> <p>19 analysis for purposes of the time series</p> <p>20 forecasting, right?</p> <p>21 A No, I did not.</p> <p>22 Q Why didn't you?</p> <p>23 A Because BERT is -- is -- does its best</p> <p>24 job on looking at natural language processing versus</p> <p>25 forecasting. I used it for the sentiment analysis</p>
<p style="text-align: right;">Page 339</p> <p>1 Q Have you -- well, what are your notes?</p> <p>2 A I'm sorry. What are my notes?</p> <p>3 Q Nodes. N-O-D-E-S.</p> <p>4 A Oh, I'm sorry. So the nodes that I used</p> <p>5 for the analysis are from Google -- sorry, there's a</p> <p>6 word associated with it.</p> <p>7 Q What are you looking at right now,</p> <p>8 Ms. Alexander?</p> <p>9 A I'm looking at my report.</p> <p>10 Q Okay. Where in your report does it</p> <p>11 describe your nodes?</p> <p>12 A On page -- actually, so it doesn't</p> <p>13 describe it on the report itself.</p> <p>14 Q Okay. So how would I know what your</p> <p>15 nodes were?</p> <p>16 A I would have to go back into the dataset</p> <p>17 that I provided you in the -- in the -- in the</p> <p>18 README file. I'm not sure where I included it.</p> <p>19 Q You didn't produce any work product</p> <p>20 relating to your network structure analysis?</p> <p>21 A So that's not necessary to replicate the</p> <p>22 data.</p> <p>23 Q Well, you just described that the nodes</p> <p>24 would be located in a README file, but you didn't</p> <p>25 produce to us with the README file, right?</p>	<p style="text-align: right;">Page 341</p> <p>1 specifically.</p> <p>2 Q What is your basis for that statement</p> <p>3 about BERT being best used for the way you used it</p> <p>4 but not for time series forecasting?</p> <p>5 A BERT was built to be a natural language</p> <p>6 processor. It has a myriad of data that backs it up</p> <p>7 for contextualization, tonality. It's -- it's an</p> <p>8 industry standard for use.</p> <p>9 Q But why wouldn't you -- well, what did</p> <p>10 you use for your sentiment -- time series</p> <p>11 forecasting sentiments?</p> <p>12 A I used the -- I used the -- I used just</p> <p>13 the forecasting. I used a regression model and a</p> <p>14 forecasting technique.</p> <p>15 Q How did you identify the sentiment of the</p> <p>16 posts for purposes of your time series forecasting?</p> <p>17 A I took it from the sentiment, the</p> <p>18 aggregate sentiment of the -- of the output of BERT.</p> <p>19 Q Oh, so you did use the BERT outcome for</p> <p>20 purposes of the time series forecasting?</p> <p>21 A As the baseline for sentiment, but the</p> <p>22 forecast itself was done with a regression model.</p> <p>23 Q Okay. So you did not use a keyword-based</p> <p>24 classification for your time series forecasting?</p> <p>25 A For my time series, with the spike and</p>

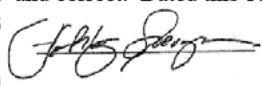
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<p style="text-align: right;">Page 342</p> <p>1 without the spike, that's a specific chart in my 2 report, the baseline is the outputs of BERT, which 3 is a classifier. And I used a regression model 4 forecasted with the spike and without the spike. 5 Q And so when, in your report, you describe 6 using 20 positive keywords and 20 negative keywords, 7 how did you use those keywords? 8 A So those keywords are still the keywords 9 based on the inputs that I provide in my report. 10 Those keywords were the ones that I used 11 consistently for the scraper across the APIs and 12 were part of the aggregate of the data that came out 13 of the classifier. And I used that into the 14 regression model. 15 Q Well, you have 20 -- you have specific 16 keywords here. You say positive keywords like love, 17 amazing, talented, support, and then negative 18 keywords like hate, terrible, toxic, boycott. So 19 it's your testimony that you used those terms in 20 your BERT analysis? 21 A So I pulled out the major cluster of -- 22 based on volume. I pulled those out, and I asked 23 it -- sorry. I instructed the system to give me a 24 sentiment score based on those keywords. Based on 25 the output from the BERT model, or BERT classifier,</p>	<p style="text-align: right;">Page 344</p> <p>1 A So in order to recreate the forecast with 2 spike and without spike, you are able to go into the 3 dataset I provided and Python code, and you should 4 be able to replicate it, based on everything I 5 provided. 6 Q Well, you didn't provide us with all of 7 your positive and negative keywords. 8 A But it's not based on all of the positive 9 and negative keywords. So if you look -- so if you 10 take the output from BERT, which is the classifier, 11 it provided aggregate sentiment scores. I used that 12 as a base. Outside of that, I also looked at 13 keywords that were associated with the sentiment, 14 and I provided a forecast and a counterfactual. 15 Q So if we wanted to recreate, how would we 16 find the complete list of the keywords that you 17 used? 18 A You don't need the complete list of the 19 keywords in order to recreate it. So if you go into 20 the files that I provided, you should be able to see 21 the details in the dataset and the README file. 22 Q Who came up with the list of keywords? 23 A For that specific -- for the forecast and 24 the counterfactual? 25 Q Uh-huh.</p>
<p style="text-align: right;">Page 343</p> <p>1 I then conducted a regression analysis. 2 Q So why didn't you just use the sentiment 3 scores from the BERT model that we discussed 4 earlier? 5 A Because the total sentiment was an 6 aggregate. So I needed more granular information 7 than the aggregate scores. 8 Q But you testified earlier that you could 9 look at the specific scores for each post. 10 A And in a subsequent question that you 11 asked me was why I did not give that as an output. 12 One of the reasons is because it was difficult to 13 get the data on a subaggregate level out of BERT in 14 order to do the analysis. So -- 15 Q I understand -- sorry. Go on. 16 A So I used specific keywords. 17 Q Okay. So your time series forecasting 18 depends on both, as an initial level, the BERT 19 sentiment classifier and then -- and keywords from 20 the BERT sentiment analysis? 21 A So it's the sentiment scores, the 22 keywords that I provided, and then outside of that, 23 the final step is to do a forecast. 24 Q Okay. So if I wanted to recreate what 25 you just described, how would I do that?</p>	<p style="text-align: right;">Page 345</p> <p>1 A I believe that was me. 2 Q Okay. So do you have that list? 3 A I would have to look at the -- I would 4 have to look at my data folder. 5 Q Do you have a data folder of -- 6 A The zip file that I provided to -- to 7 counsel. 8 Q Okay. So you're saying that the data 9 file you provided us should include the list of 10 keywords that you used? 11 A It should provide you with everything you 12 need to replicate -- 13 Q That wasn't my question. 14 MR. FRITZ: Objection. 15 BY MS. GOVERNSKI: 16 Q Does the data you provided us include the 17 list of all the keywords you used? 18 A I would have to look to see if that is 19 included. 20 Q Okay. So how often have you created a 21 regression model? 22 A How often? 23 Q Yeah. 24 A I -- so a regression analysis, I've done 25 it at Ipsos, as well as Nielsen, as part of leading</p>

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<p style="text-align: right;">Page 346</p> <p>1 the Bases team, which is a product that we use on a 2 daily basis for clients. 3 Q How often did you create a regression? 4 A I probably did regressions or checked 5 regressions that my team did on a weekly basis. 6 Q Okay. Your report lists certain 7 documents including Ms. Lively's discovery 8 responses. Did you personally review all of her 9 responses to the interrogatories? 10 A The last word was "interrogatories"? 11 Q Yup. 12 A I'm not sure what -- what you mean. 13 Q In your Exhibit Appendix C, it states 14 that you reviewed Ms. Lively's third amended 15 responses and objections to a set of 16 interrogatories. It lists four documents. I'm 17 wondering if you reviewed personally all of those 18 interrogatory responses. 19 A I would have, yes. I went through the 20 files meticulously, so -- 21 Q Okay. 22 A -- I went through everything that was 23 provided. 24 Q Okay. And did you review the underlying 25 materials that are referenced in the</p>	<p style="text-align: right;">Page 348</p> <p>1 I'm not sure if it's from the amended or from 2 Dr. Mayzlin and Dr. Humphreys. 3 Q Okay. So in one of the communications, 4 they talked about successfully shifting the 5 narrative online. Did you consider that 6 communication? 7 A The communication, no, that was not part 8 of my consideration. So the goal that I went into 9 with analyzing was to look at it without assumptions 10 or applied assumptions to look at the dataset from a 11 clean perspective. 12 MR. FRITZ: John, how long have we been 13 on the record? 14 MS. GOVERNSKI: Well, we can go off the 15 record, if you want to get a check of the time. 16 THE VIDEOGRAPHER: Seven hours exactly. 17 MS. GOVERNSKI: Was his question included 18 in that? 19 Okay. I have one final question. Are we 20 still on the record, John? 21 THE VIDEOGRAPHER: Yes. 22 BY MS. GOVERNSKI: 23 Q One final question. So when you said you 24 wanted to look at the data without considering the 25 external materials, you then did not consider any of</p>
<p style="text-align: right;">Page 347</p> <p>1 interrogatories? 2 A I'm not sure I reviewed the underlying 3 materials, no. 4 Q Okay. What was your response to parts of 5 the interrogatory that discussed how the defendants 6 boosted contents on social media? 7 A I can't -- I don't recall the data 8 that -- or the context that you're referring to. 9 Q Okay. Well, what is your reaction to 10 understanding that the defendants communicated about 11 boosting social media? 12 MR. FRITZ: Objection. 13 THE WITNESS: So I read through -- I 14 recall some of the claims, but I can't remember if 15 it was in that report or if it was part of 16 Dr. Mayzlin's and Dr. Humphreys' report and them 17 referencing it. I can't tease out the difference 18 between where the information came from in my mind. 19 BY MS. GOVERNSKI: 20 Q Okay. Well, Ms. Lively's interrogatory 21 included multiple pages of quotes from direct emails 22 and communications amongst the defendants. 23 Do you remember reviewing those? 24 A Not offhand. I remember some of it, but 25 again, I'm not sure if it's from the report or --</p>	<p style="text-align: right;">Page 349</p> <p>1 the communications amongst the defendants when you 2 were reaching your conclusions? 3 A I'm not sure I understand the question. 4 Are you talking about the underlying data that 5 was -- or the material that is referenced outside of 6 the actual amended itself? 7 Q I'm talking about in the interrogatory, 8 the specific quotes over multiple pages from email 9 communications and text communications amongst the 10 defendants. 11 A So, I'm sorry. So you keep using the 12 word "interrogatories," and that's not something I'm 13 familiar with. So I read through the amended -- the 14 amendment from Ms. Lively. If you're referring to 15 references of emails or, I don't know, any content 16 that was not in that amended document, then no, I 17 probably did not review and/or consider it. 18 MS. GOVERNSKI: Okay. I'm going to keep 19 this deposition open and seek relief from the Court 20 to have an additional 30 minutes of time, given how 21 the deposition started. 22 MS. ADAMS-JACK: Can we claw back 23 Exhibit 26? We didn't get to it, and I think it 24 expired my ability to pull it back. 25 THE STENOGRAPHIC REPORTER: That's a</p>

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<p style="text-align: right;">Page 350</p> <p>1 Maggie question.</p> <p>2 THE A/V TECHNICIAN: I think that should</p> <p>3 be -- that can be done. I won't be able to do that</p> <p>4 right now. I also don't have access to that because</p> <p>5 of the time that's elapsed. But we can -- we can</p> <p>6 figure that out.</p> <p>7 MS. GOVERNSKI: Okay. I will send an</p> <p>8 email.</p> <p>9 THE STENOGRAPHIC REPORTER: Thank you.</p> <p>10 MS. GOVERNSKI: Okay. Well,</p> <p>11 Ms. Alexander, we may be back here, at least for</p> <p>12 some time, so we will work to schedule that</p> <p>13 promptly.</p> <p>14 MR. FRITZ: And the record should reflect</p> <p>15 we proposed an additional five minutes to avoid</p> <p>16 judicial intervention and that was rejected by</p> <p>17 Ms. Lively's counsel.</p> <p>18 THE STENOGRAPHIC REPORTER: And Counsel,</p> <p>19 do we need that part with the judge earlier on that</p> <p>20 court call, do we need that transcribed with the</p> <p>21 same transcript?</p> <p>22 MS. GOVERNSKI: It should be transcribed,</p> <p>23 but it can be its own separate transcript. We</p> <p>24 probably need to then provide that to the Court.</p> <p>25 THE STENOGRAPHIC REPORTER: Okay.</p>	<p style="text-align: right;">Page 352</p> <p>1 REPORTER'S CERTIFICATE</p> <p>2 I, ASHLEY SOEVYN, a Certified Shorthand</p> <p>3 Reporter of the State of California, do hereby</p> <p>4 certify:</p> <p>5 That the foregoing proceedings were taken</p> <p>6 before me at the time and place herein set forth;</p> <p>7 at which time the witness was put under oath by me;</p> <p>8 That the testimony of the witness, the</p> <p>9 questions propounded, and all objections and</p> <p>10 statements made at the time of the examination were</p> <p>11 recorded stenographically by me and were thereafter</p> <p>12 transcribed;</p> <p>13 That a review of the transcript by the</p> <p>14 deponent was/ was not requested;</p> <p>15 That the foregoing is a true and correct</p> <p>16 transcript of my shorthand notes so taken.</p> <p>17 I further certify that I am not a relative</p> <p>18 or employee of any attorney of the parties, nor</p> <p>19 financially interested in the action.</p> <p>20 I declare under penalty of perjury under</p> <p>21 the laws of California that the foregoing is true</p> <p>22 and correct. Dated this 16th day of December, 2025.</p> <p>23 </p> <p>24 _____</p> <p>25 ASHLEY SOEVYN</p> <p>25 CSR No. 12019</p>
<p style="text-align: right;">Page 351</p> <p>1 MS. GOVERNSKI: Thank you.</p> <p>2 THE VIDEOGRAPHER: Okay to go off the</p> <p>3 record, everybody?</p> <p>4 MS. GOVERNSKI: Yes, thank you.</p> <p>5 THE VIDEOGRAPHER: Okay. We're off the</p> <p>6 record. It's 8:06 p.m.</p> <p>7 (WHEREUPON THE DEPOSITION CONCLUDED AT 5:06 p.m.</p> <p>8 PST, 8:06 p.m. EST)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 353</p> <p>1 BLAKE LIVELY vs. WAYFARER STUDIOS LLC, ET AL.</p> <p>2 12/15/2025 - NICOLE ALEXANDER</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE____ LINE____ CHANGE_____</p> <p>5 _____</p> <p>6 REASON_____</p> <p>7 PAGE____ LINE____ CHANGE_____</p> <p>8 _____</p> <p>9 REASON_____</p> <p>10 PAGE____ LINE____ CHANGE_____</p> <p>11 _____</p> <p>12 REASON_____</p> <p>13 PAGE____ LINE____ CHANGE_____</p> <p>14 _____</p> <p>15 REASON_____</p> <p>16 PAGE____ LINE____ CHANGE_____</p> <p>17 _____</p> <p>18 REASON_____</p> <p>19 PAGE____ LINE____ CHANGE_____</p> <p>20 _____</p> <p>21 REASON_____</p> <p>22 _____</p> <p>23 _____</p> <p>24 NICOLE ALEXANDER Date _____</p> <p>25</p>

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1 BLAKE LIVELY vs. WAYFARER STUDIOS LLC, ET AL.

2 12/15/2025 - NICOLE ALEXANDER

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, NICOLE ALEXANDER, do hereby declare that I

5 have read the foregoing transcript, I have made

6 any corrections, additions, or changes I deemed

7 necessary as noted on the Errata to be appended

8 hereto, and that the same is a true, correct and

9 complete transcript of the testimony given by me.

10

11 _____

12 NICOLE ALEXANDER Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16

17

18 _____

19 NOTARY PUBLIC

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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MOTION TO SEAL



Kevin Fritz
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December 23, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL

Dear Judge Liman:

On behalf of Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal Exhibit 2 to the Declaration of Kevin Fritz, which is submitted by the Wayfarer Parties in opposition to Blake Lively’s motion for sanctions and other relief. (Dkt. 1133). Exhibit 2 contains excerpts from the transcript of the deposition of non-party Jenny Slate, which has been designated as confidential by her counsel.

By this letter, the Wayfarer Parties also respectfully request that the Court permanently seal the excerpts of the transcript of the deposition of one of their experts, which contains specifics of an illness from which she recently suffered. (Dkt. 1133-1). The Wayfarer Parties have filed contemporaneously herewith the full transcript of that deposition, which redacts the aforementioned information. (*See* Dkt. 1134) (approving the redaction of medical information).

Respectfully submitted,

/s/ Kevin Fritz

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