

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.

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JENNIFER ABEL,  
Third-party Plaintiff,  
vs.  
JONESWORKS, LLC,  
Third-party Defendant.

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WAYFARER STUDIOS LLC, et al.  
Consolidated Plaintiffs,  
vs.  
BLAKE LIVELY, et al.  
Consolidated Defendants.

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**\*\*CONFIDENTIAL\*\***

VIDEO-RECORDED DEPOSITION OF ALEXANDRIA SAKS  
Los Angeles, California  
Wednesday, September 24, 2025

Stenographically Reported by: Ashley Soevyn,  
CALIFORNIA CSR No. 12019  
Job No. CA7624602  
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1 were you employed? 10:33:14

2 A A company called June Pictures that I  
3 co-owned.

4 Q Were you employed at June Pictures as a  
5 producer? 10:33:24

6 A Yes.

7 Q How are you generally compensated as a  
8 producer? Not the amount, but what your  
9 compensation is comprised of. For example, salary,  
10 bonus, royalties? 10:33:33

11 A As a producer now, on my fees on  
12 individual movies.

13 Q What do you mean by "on my fees on  
14 individual movies"?

15 A I'm compensated by fees from whoever is 10:33:49  
16 financing the movie.

17 Q And for each film, are you compensated a  
18 set amount that is decided upfront, or is that an  
19 amount that could vary based on the success of the  
20 film? 10:34:07

21 A Both.

22 Q You were a producer on It Ends with Us,  
23 correct?

24 A Correct.

25 Q How did you come to be a producer on the 10:34:19

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1 Q How often were you on the set in New 10:59:59  
2 Jersey?  
3 A Every day.  
4 Q You were present for every day of  
5 filming? 11:00:04  
6 A I think there is one that I missed  
7 because I had the premiere of No Hard Feelings, and  
8 then the last two days of shooting on the second  
9 round in January of 2024, I had already jumped onto  
10 another movie, so I didn't come back to Los Angeles. 11:00:20  
11 Q Do you recall which day or days you  
12 missed for the premiere of No Hard Feelings?  
13 A I don't remember the work we did that  
14 day.  
15 Q As a producer, did you report into 11:00:32  
16 Wayfarer?  
17 A Yes.  
18 Q Did you report to Mr. Baldoni as the  
19 director?  
20 A Yes. 11:00:40  
21 Q And did you also report to Mr. Heath as  
22 the CEO and co-studio head?  
23 A Yes.  
24 Q They were your bosses?  
25 A Yes. 11:00:50

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1 Q You mentioned Ange Giannetti earlier. 11:00:52

2 Who is she?

3 A She was the EVP at Sony who was our  
4 day-to-day creative.

5 Q How often do you recall Ms. Giannetti 11:01:03  
6 being on set?

7 A In the first round, she was there for a  
8 few days, from what I remember, maybe more than  
9 that. Definitely more than a normal executive is  
10 there in my experience. And then, on the second 11:01:20  
11 round, she was there most days.

12 Q When you say that Ms. Giannetti was on  
13 set "a few days in the first round," would it be  
14 fair to estimate two to four days?

15 A That sounds right. 11:01:36

16 Q As a producer of, it sounds like, a  
17 decade, is it important to you that cast and crew  
18 working on your projects have an outlet through  
19 which to report concerns about behavior in the  
20 workplace? 11:01:50

21 A Yes.

22 Q It's required practice on film sets that  
23 cast and crew members have a place to report  
24 concerns, right?

25 MS. GAROFALO: Objection. 11:01:59

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1 A No. 11:05:18

2 Q Did you understand whether HR would be  
3 available on set to cast and crew of the film?

4 A Eventually.

5 Q When did you become aware? 11:05:26

6 A At some point in early prep when we were  
7 starting to crew up and hire people.

8 Q Is it your understanding that Wayfarer  
9 does have a human resources department?

10 A I don't know. 11:05:44

11 Q Do you know -- was there a designated  
12 individual who would perform human resources  
13 functions on the film?

14 A I believe it was a number or an email  
15 that people contacted. And then, if I remember 11:05:59  
16 correctly, there was a third party. But I don't  
17 believe Wayfarer had official human resources.

18 Q Is it your recollection that there was a  
19 third party to provide human resources functions to  
20 cast and crew on set? 11:06:24

21 A I don't remember.

22 Q Do you have any memory of who that third  
23 party may have been?

24 A I don't.

25 Q As someone who was on set every day, did 11:06:46

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1 THE STENOGRAPHIC REPORTER: Yes, we are. 10:15:44

2 MS. ROESER: Perfect.

3 MS. GAROFALO: Is this 1 or 2?

4 MS. CLIMACO: I gave you two copies with

5 both exhibits. 11:08:19

6 BY MS. ROESER:

7 Q The first document I handed you is marked

8 as Exhibit 1. It's an email dated March 12th,

9 2023, and it bears the Bates-stamp, which is the

10 number on the corner, of AS62. 11:08:34

11 Do you see that?

12 A Uh-huh.

13 Q This is an email that you sent, correct?

14 A Yes.

15 Q To Jamey Heath, among others? 11:08:41

16 A Yes.

17 Q The second document I sent you is marked

18 as Exhibit 2. It is an email dated March 13, 2023,

19 and bears the Bates AS8.

20 Do you see that? 11:08:55

21 A Yes.

22 Q This is also an email that you sent,

23 correct?

24 A Correct.

25 Q Please direct your attention to 11:09:06

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1 Exhibit 1. As of March 12, 2023, when you sent this 11:09:07  
2 email, did you know whether Wayfarer had workplace  
3 harassment protocols in place?

4 A It looks like I didn't.

5 Q And at that time, you proposed that 11:09:21  
6 because of Justin's role, the harassment protocols  
7 come from Sony; is that right?

8 A Correct.

9 Q What did you mean when you wrote:

10 (As read): 11:09:35

11 "Because of Justin's role at Wayfarer,  
12 our workplace harassment protocols  
13 should come from Sony"?

14 A I assume I meant because he was the  
15 director, co-lead actor, and co-owned the studio. 11:09:46

16 Q Were you concerned that as co-lead actor,  
17 director, and co-owner of the studio, people may not  
18 feel comfortable raising concerns to Mr. Baldoni?

19 A Correct.

20 Q Did you have any other concerns with 11:10:03  
21 respect to Wayfarer overseeing the human resources  
22 or harassment protocols on set?

23 A Because Wayfarer -- it had become clear  
24 that they were a less experienced studio. The idea  
25 of Sony being responsible for something so important 11:10:17

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1 made me feel more secure. 11:10:21

2 Q All cast and crew reported to Mr. Baldoni  
3 and Mr. Heath on set, correct?

4 A Yes.

5 Q They were everyone's boss? 11:10:29

6 A Yes. And me as well. But again,  
7 Mr. Heath as the signer of checks, technical  
8 copyright holder, CEO of the owner of the film,  
9 technically was the boss.

10 Q When I refer to cast and crew, will you 11:10:50  
11 understand that I'm referring to the actor --  
12 basically, anyone who worked on set?

13 A Yes.

14 Q Did you also have concerns about Wayfarer  
15 overseeing the human resources function for the film 11:11:08  
16 given Mr. Heath's role is CEO?

17 A Less so, aside from his lesser  
18 experience.

19 Q You proposed that Sony provide a  
20 training, harassment training, for cast and crew; is 11:11:30  
21 that right?

22 A Correct.

23 Q Turn your attention to Exhibit 2, please.

24 Are you confirming in this email that

25 Mr. Heath agreed with you that Sony should provide 11:11:50

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1 Bates stamp AS4588. 11:36:58

2 (Exhibit 4 marked for identification.)

3 BY MS. ROESER:

4 Q Do you recognize this document as --

5 MS. GAROFALO: Can we wait until 10:15:44

6 everybody has a copy of the exhibit?

7 BY MS. ROESER:

8 Q Ms. Saks, do you recognize this email?

9 A Vaguely.

10 Q This is an email from Mr. Baldoni to you, 11:37:33

11 dated February 19, 2023, correct?

12 A Yes.

13 Q If you direct your attention to the

14 second paragraph, it reads:

15 (As read): 11:37:45

16 "I want to apologize to the group,

17 especially to Alex."

18 Do you see that?

19 A Yes.

20 Q What did you understand Mr. Baldoni to be 11:37:52

21 apologizing to you for?

22 A I believe the day before, we were on a

23 call or a Zoom where he yelled at me.

24 Q Mr. Baldoni yelled at you?

25 A I believe so. 11:38:09

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1 Q When you say he yelled at you, did he 11:38:12  
2 raise his voice?

3 A I believe so.

4 Q Do you recall who else was on the Zoom?

5 A I believe everyone on the email chain, 11:38:24  
6 and it may have been a call.

7 Q Ms. Giannetti, Mr. Calof, AJ Marbory,  
8 yourself, and Mr. Baldoni were in the meeting?

9 A I don't know that AJ was. That's his  
10 assistant. But Ange, Jamey and Calof probably were, 11:38:43  
11 along with Justin.

12 Q What do you recall about this meeting, in  
13 February of 2023, in which Mr. Baldoni yelled at  
14 you?

15 A I don't remember much. But reading the 11:38:55  
16 email, I believe he was talking about his own abuse.  
17 Yeah, when I tried to voice an opinion, he yelled at  
18 me. But I don't remember exactly what the words  
19 were.

20 Q Do you recall the gist of what he yelled 11:39:27  
21 at you?

22 A I don't.

23 Q Do you recall what opinion you were  
24 voicing at the time?

25 A I don't. 11:39:40

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1 Q In the second paragraph, Mr. Baldoni 11:39:47  
2 writes:

3 (As read):

4 "I feel I have failed at being a safe  
5 place for others. So I want to 11:39:52  
6 apologize as my behavior yesterday, for  
7 me, was not acceptable. I try very  
8 hard not to interrupt the women in my  
9 life, and unfortunately, I've been  
10 failing in that on quite a few 11:40:06  
11 occasions over the last few months  
12 oftentimes and yesterday in particular  
13 to you."

14 Do you see that?

15 A Yes. 11:40:16

16 Q Did you agree with Mr. Baldoni that he  
17 had failed at being a safe place for others?

18 A I have no idea.

19 Q Did you feel that he had failed at being  
20 a safe space for you? 11:40:29

21 A I didn't need him to be a safe space for  
22 me.

23 Q Did you agree with Mr. Baldoni that his  
24 behavior and yelling at you during the February 2023  
25 meeting was not acceptable? 11:40:42

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1 A Yes. 11:40:44

2 Q Why?

3 A I don't yell at work colleagues, nor do I  
4 like being yelled at.

5 Q You think it's inappropriate to yell at 11:40:57  
6 your colleagues?

7 A Personally.

8 Q Do you recall during this February 2023  
9 call, Mr. Baldoni interrupting you?

10 A I don't recall. 11:41:10

11 Q Was it your experience on the set that  
12 Mr. Baldoni would often interrupt you when you were  
13 speaking?

14 A Did you say on the set?

15 Q In connection with the film? 11:41:21

16 A Oh, yes.

17 Q Mr. Baldoni often interrupted you while  
18 you were speaking?

19 A Sometimes.

20 Q Did you observe Mr. Baldoni interrupt 11:41:30  
21 other women in connection with the film?

22 A I can't recall.

23 Q Towards the end of that paragraph,  
24 Mr. Baldoni writes:

25 (As read): 11:41:46

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1	A The other times that I recall were	11:45:12
2	usually in group meetings where other women were	
3	present, but I never saw him directly mansplain to	
4	one woman or a group of women. It was more a big	
5	conversation with a group in a production meeting or	11:45:31
6	something.	

7 Q Did you observe Mr. Baldoni yell at  
8 anyone else in connection with the film, other than  
9 you?

10	A	Not that I can recall.	11:45:42
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11 Q Did Mr. Baldoni yell at you more than  
12 once in connection with the film?

13	A	Yes.
----	---	------

14	Q How many times would you estimate that	
15	Mr. Baldoni yelled at you?	11:45:50

16           A     I believe it was three.

17 Q Would that be two times in addition to  
18 this February 2023 meeting?

19	A	I believe so.
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20 Q What are the other two incidents that you 11:46:01  
21 recall Mr. Baldoni yelling at you?

22           A       One other was also on -- as I believe the  
23       other time was on a Zoom. It was a notes Zoom. I  
24       don't remember the details beyond that. And then on  
25       a follow-up Zoom, he apologized to me in front of           11:46:20

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1 the entire group for doing so on the previous Zoom. 11:46:26

2 Q So on the -- you mentioned a notes Zoom?

3 A Uh-huh.

4 Q What is that?

5 A Where we would get on a Zoom and have a 11:46:40

6 meeting about the latest draft and talk about

7 whatever creative notes we all had.

8 Q So during a meeting to discuss notes of  
9 the draft -- on the draft of the script, Mr. Baldoni  
10 yelled at you? 11:46:58

11 A Yes.

12 Q Do you recall what he yelled at you?

13 A I don't.

14 Q Do you recall the topic that was being  
15 discussed at the time that he yelled at you? 11:47:07

16 A I don't.

17 Q Do you recall who else was present during  
18 the Zoom when he yelled at you on the Zoom with  
19 respect to discussing notes about the current draft  
20 of the script? 11:47:21

21 A I believe Ange, Jamey, and probably  
22 Calof.

23 Q Is that Andrew Calof?

24 A Yes.

25 Q Roughly when do you recall the Zoom -- 11:47:36

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1 the notes Zoom occurring during which Mr. Baldoni 11:47:37  
2 yelled at you?

3 A I believe it was in January of 2023.

4 Q Do you recall the general topic of  
5 discussion during that Zoom? 11:47:55

6 A Just the script.

7 Q Do you recall Mr. Baldoni also  
8 mansplaining to you during that note Zoom in January  
9 of 2023?

10 MS. GAROFALO: Objection. 11:48:07

11 THE WITNESS: I don't recall.

12 BY MS. ROESER:

13 Q Do you recall whether he interrupted you  
14 during that notes Zoom in January of 2023?

15 A I don't recall. 11:48:13

16 Q You mentioned that there was a third  
17 incident in which Mr. Baldoni yelled at you; is that  
18 right?

19 A Yes.

20 Q And when was that, roughly? 11:48:42

21 A That was on set towards the end of the  
22 first round of shooting.

23 Q Would that have been roughly June 2023?

24 A I believe so.

25 Q What do you recall about the meeting on 11:49:03

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1 set with Mr. Baldoni in which he yelled at you? 11:49:06

2 A We were shooting at the Root location.

3 It was a very stressful day of shooting because we

4 had a lot of work to do in a short amount of time.

5 He came up behind monitor, where I was sitting. 11:49:24

6 Jamey and Ange were behind me. And he came up to me

7 and asked me how I thought the scene was going, and

8 if he was getting it, which I thought he did and

9 also expressed that I didn't believe that he needed

10 more coverage. 11:49:44

11 And then he yelled at me and said that, I

12 don't remember exactly, but something to the effect

13 of -- I actually don't remember exactly what he

14 said. But he yelled something and then slammed his

15 hands on the director's chair next to me, and walked 11:50:03

16 away.

17 And then I turned around and looked at

18 Amy -- Ange and Jamey, and said that if he did

19 that -- something like that to me one more time,

20 that I was going to walk off the movie. 11:50:19

21 Q Why did you feel like you would walk off

22 the movie if he behaved in that manner again?

23 A It was the first time I felt physically

24 intimidated.

25 Q Why did you feel physically intimidated 11:50:44

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1 during that interaction with Mr. Baldoni? 11:50:47

2 A Because he slammed his hands on a chair  
3 right next to me while yelling at me and saying my  
4 name. That's the one thing I remember is he said,  
5 "Alex." 11:50:58

6 Q He yelled "Alex" and then slammed his  
7 hands on the chair?

8 A Yes.

9 Q Can you describe for me where you were  
10 when that happened? I know you mentioned that you 11:51:14  
11 were filming a Root scene. What did that look like?

12 A We were in a restaurant, and the front of  
13 the restaurant is where we were filming. And then  
14 there was sort of a divider in the restaurant and  
15 village was behind the divider towards the back of 11:51:28  
16 the restaurant. And that's where I was sitting in  
17 one of the first chairs closest to the monitor at  
18 village.

19 Q So you were sitting at the village. Was  
20 anyone -- who was around you? 11:51:49

21 A Ange and Jamey were sitting in two chairs  
22 behind me.

23 Q Was anyone else there?

24 A There was probably lots of crew milling  
25 around, but no one I can remember specifically. 11:52:02

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1 Q The crew would have been milling around 11:52:11  
2 the village and also the area where the actual  
3 filming was taking place in the front of the  
4 restaurant?

5 A Correct, but also bringing either 11:52:14  
6 equipment or props back and forth from the back  
7 entrance up to the front where the shooting was  
8 happening.

9 Q Did you say that what prompted  
10 Mr. Baldoni to yell your name and slam his hands 11:52:24  
11 down on a chair was that you gave him a note that  
12 you didn't think he needed more coverage of the  
13 scene?

14 A Yeah. I said I didn't think he needed  
15 more coverage of the scene, and I think he wanted to 11:52:38  
16 shoot more coverage of the scene.

17 Q What -- what do you mean when you say  
18 "coverage of the scene"?

19 A Coverage of a scene is shooting a scene  
20 from various different angles. 11:52:51

21 Q Mr. -- so your impression was that  
22 Mr. Baldoni wanted to shoot the scene from more  
23 angles?

24 A Correct.

25 Q And you didn't think that was necessary? 11:53:05

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1 A Correct. 11:53:06

2 Q And simply noting to him that you didn't  
3 think he needed the scene from additional angles,  
4 prompted Mr. Baldoni to yell and slam a chair?

5 MS. GAROFALO: Objection. 11:53:20

6 THE WITNESS: I was answering his  
7 question. So, yes.

8 BY MS. ROESER:

9 Q You answered a question that he asked  
10 you, and he responded by yelling at you and slamming 11:53:29  
11 a chair on the ground?

12 A Yes.

13 Q And you were physically intimidated by  
14 that?

15 A Yes. 11:53:41

16 MS. GAROFALO: Objection.

17 BY MS. ROESER:

18 Q Were there any other physical movements  
19 that Mr. Baldoni was making? Was he getting big,  
20 for example? Was he approaching you? 11:53:47

21 A Not that I can recall.

22 Q Do you feel that was appropriate behavior  
23 for your boss?

24 A No.

25 Q And Mr. Baldoni yelled at you and slammed 11:54:11

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1 the chair, it sounds like in front of several other 11:54:13  
2 people; is that right?

3 A Yes.

4 Q In front of Ms. Giannetti, Mr. Heath, as  
5 well as multiple crew members? 11:54:23

6 A From what I remember.

7 Q How many crew members could you estimate  
8 were around at the time?

9 A I have no idea.

10 Q Would it be more than ten? 11:54:33

11 A I don't think so.

12 Q Somewhere between five and ten, maybe?

13 A Could be under five; could be more than  
14 five. I really don't remember.

15 Q Was Mr. Baldoni in the scene that 11:54:47  
16 prompted him to yell at you?

17 A Yes.

18 Q Was it your impression that he wanted  
19 more coverage of himself in the scene?

20 A Not necessarily. 11:55:02

21 Q Did Mr. Baldoni ever explain to you why  
22 he yelled at you during that time?

23 A No.

24 Q Did he apologize?

25 A I don't remember. 11:55:19

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1 A Yes. 12:04:32

2 Q Okay. So it either would have been --

3 Mr. Baldoni's behavior and yelling at you either

4 would have occurred at the time of filming the scene

5 in which his character meets Lily's mother or the 12:04:39

6 scene in which Mr. Baldoni's character gets in a

7 fight with Atlas?

8 A Correct.

9 Q In -- am I correct that production on the  
10 film was split into two phases? 12:05:01

11 A Yes.

12 Q One before the Hollywood strikes and one  
13 after?

14 A That's correct.

15 Q During roughly what time period did the 12:05:07  
16 first phase of production take place?

17 A May and June of 2023.

18 Q And during what time frame did the second  
19 phase of production take place, roughly?

20 A January into February of 2024. 12:05:22

21 Q When I refer to production phase one or  
22 something similar, will you understand that I am  
23 referring to the time period of May -- from May to  
24 June of 2023?

25 A Yes. 12:05:39

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1 Q During that first phase of production, 12:05:45  
2 would you describe the set as well organized?

3 A I'm sorry, you said phase one?

4 Q Correct.

5 A No. 12:05:56

6 Q Why not?

7 A Because it was not being well run and  
8 managed.

9 Q The set was not being well run or managed  
10 during the first phase of production by Mr. Baldoni? 12:06:13

11 A It wasn't just Mr. Baldoni. We started  
12 the shoot with a very weak first AD. Our production  
13 team was very tiny and overwhelmed. And then we had  
14 Wayfarer as the decision-making studio, who was also  
15 very green. 12:06:37

16 Q Who was the very weak first AD that you  
17 mentioned?

18 A Julie Bloom.

19 Q Why did you believe Ms. Bloom to be very  
20 weak? 12:06:53

21 A She had come from, more recently, the  
22 television world, which does not require ADs unless  
23 you're working on the pilot to really construct the  
24 framework for how a production is going to run. And  
25 so doing this film, from my memory, she had not done 12:07:08

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1 one in a while, and we just were not set up for 12:07:12  
2 success as an operation.

3 Q How would you generally expect a first AD  
4 in a film set to -- let me rephrase.

5 What are your expectations for how a 12:07:26  
6 first AD on a film set performs?

7 A That they are hyper-communicative, in  
8 constant communication with all departments,  
9 understanding the timeline of any given day in  
10 addition to the prep work to get to that given day. 12:07:48  
11 They're also in lockstep with the director and the  
12 DP on what the shot list is for the entire day.

13 They also should have a really acute  
14 understanding of the hair and makeup timings, and  
15 how the actors are going to be operating on set in 12:08:08  
16 terms of needing rehearsal, not needing rehearsal,  
17 how long it takes for their hair, makeup and  
18 costumes to be done. They are -- they are the clock  
19 of the day.

20 Q In your view, did Ms. Bloom meet those 12:08:26  
21 expectations for how a first AD on a film set should  
22 perform?

23 A No, I think she -- she tried very hard,  
24 but was not able to wrap her head around the entire  
25 machine. 12:08:42

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1 Q Did you recommend terminating Ms. Bloom 12:08:43  
2 as first AD on the film?

3 A I was not the first to recommend it, but  
4 ultimately, yes.

5 Q And you supported terminating 12:08:51  
6 Ms. Bloom --

7 A I did.

8 Q -- as the first AD?

9 A Sorry.

10 THE STENOGRAPHIC REPORTER: One more 12:08:59  
11 time, Steph. There was cross talk.

12 MS. ROESER: That's okay.

13 BY MS. ROESER:

14 Q You supported terminating Ms. Bloom as  
15 the first AD on the film set; is that right? 12:08:59

16 A I did.

17 Q What were your impressions, if any, of  
18 how Mr. Baldoni performed his responsibilities as a  
19 director during phase one?

20 A I think he was deeply overwhelmed. And 12:09:24  
21 despite a long prep, very unprepared on a daily  
22 basis for a lot of reasons.

23 Q Fair to say you did not find him to be an  
24 effective director during phase one?

25 A Not necessarily. There's a lot of facets 12:09:46

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1 A Yes. 01:14:14

2 Q Do you recall the brunch with Jenny -- is  
3 that Jenny Slate?

4 A Yes.

5 Q Do you recall having brunch with Jenny 01:14:23  
6 Slate in May 29, 2023, or around that time?

7 A I do.

8 Q And tell me about that brunch.

9 A I -- Jenny and I had had a meal prior to  
10 this one, so I went into it thinking that it was a 01:14:35  
11 friendly brunch, which it was to a degree. But  
12 during it, she brought up some concerns that she was  
13 having on the movie, which was the first time I was  
14 hearing about them.

15 Q What concerns did Ms. Slate bring up 01:14:57  
16 during your brunch on or around May 29th?

17 A I don't remember exact language that was  
18 used, but there were a few. One was that in a  
19 scene, I believe the week prior, Justin had  
20 commented on her physical appearance, which made her 01:15:20  
21 uncomfortable. That in an initial creative Zoom  
22 meeting between Justin, Blake, and Jenny, Jenny and  
23 Blake only found out at the very end of the Zoom  
24 that Justin had been recording it the whole time.  
25 And that made both Blake and Jenny, from Jenny's 01:15:44

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1 point of view, feel very uncomfortable. 01:15:49

2 There was a mention of some -- some kind  
3 of comments that Jamey had made to Jenny regarding  
4 how generous they had been with her housing  
5 allowance and that it was important for them to take 01:16:07  
6 care of new mothers, and that made her  
7 uncomfortable. And then, there was a lot of other  
8 conversation, nonspecific, but that she was  
9 uncomfortable in both of their presences and really  
10 would prefer to never see Jamey again, knowing that 01:16:28  
11 Justin was the director and co-star she would have  
12 to.

13 Q Ms. Slate says that she never wanted to  
14 see Mr. Heath again?

15 A Correct. 01:16:41

16 Q And it's your impression that Ms. Slate  
17 knew that she would have to see Mr. Baldoni because  
18 he was the director and co-star, but perhaps she  
19 didn't want to see him either?

20 A I can't speak to that, but that was my 01:16:50  
21 assumption.

22 Q You said a lot there. So I want to break  
23 it down a little, okay?

24 A Okay.

25 Q You mentioned that Ms. Slate raised -- 01:17:03

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1 MS. ROESER: Sorry. My transcript is 01:17:05  
2 just not following along.

3 BY MS. ROESER:

4 Q Sorry about that.

5 You raised -- so you testified that 01:17:05  
6 Ms. Slate raised, during your brunch in May, that  
7 Mr. Baldoni had commented on her physical appearance  
8 which made her uncomfortable, right?

9 A That Justin commented on her physical  
10 appearance, yes. 01:17:37

11 Q And do you recall if Ms. Slate told you  
12 whether that happened while a scene was being  
13 filmed, while they were on set, or at some other  
14 time?

15 MS. GAROFALO: Objection. Did you mean 01:17:49  
16 Ms. Slater -- Slate?

17 MS. ROESER: I said Ms. Slate.

18 MS. GAROFALO: I'm sorry. I thought you  
19 said Ms. Blake. I didn't hear you.

20 BY MS. ROESER: 01:18:05

21 Q Do you recall if Ms. Slate told you where  
22 she was when Mr. Baldoni commented on her  
23 appearance?

24 A I -- I don't remember which location it  
25 was, but it was on set in costume prior to filming. 01:18:12

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1 Q During a time when -- during a time when 01:18:19  
2 no scene was being filmed?

3 A We were not filming.

4 Q Okay.

5 A Yet. 01:18:26

6 Q Did Ms. Slate tell you what the comment  
7 about what her appearance was?

8 A It was -- I don't recall if it was that  
9 he called her hot or sexy, and I don't recall if it  
10 was once or twice. The first time would have been 01:18:40  
11 in the flower shop when she was wearing an  
12 all-leather jumpsuit, and the second would have been  
13 in the karaoke scene. I don't remember what she was  
14 wearing that day, and I don't remember which comment  
15 was attributed to which. 01:18:59

16 Q But you recall Ms. Slate informing you  
17 that Mr. Baldoni had called her hot and sexy?

18 A Or.

19 Q Hot or sexy?

20 A Correct. 01:19:13

21 Q Okay. And you don't recall the  
22 specific --

23 A I don't.

24 Q You don't recall what she was wearing at  
25 the time? 01:19:18

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1 A I don't. 01:19:18

2 Q Did Ms. Slate share with you during that  
3 brunch that she felt Mr. Baldoni's comment that she  
4 was hot or sexy, was directed to her personally?

5 A I'm not sure I understand the question. 01:19:39

6 Q Did Ms. Slate share with you during  
7 brunch that she felt Mr. Baldoni commenting that she  
8 was hot or sexy was directed at her rather than her  
9 character?

10 A She didn't specify. 01:19:51

11 Q Did you have an understanding one way or  
12 another?

13 MS. GAROFALO: Objection.

14 THE WITNESS: I didn't.

15 BY MS. ROESER: 01:19:58

16 Q Did Ms. Slate also share with you that  
17 Mr. Baldoni had commented on Ms. Lively's appearance  
18 in a similar manner?

19 A She would not give me specifics about  
20 what Blake was experiencing, but I believe had 01:20:11  
21 encouraged Blake to speak to me directly and that I  
22 reach out to Blake.

23 Q Did Ms. Slate suggest to you that she had  
24 encouraged Blake to reach out to you about her own  
25 concerns with Mr. Baldoni and Mr. Heath? 01:20:34

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1 A I believe she did. 01:20:37

2 Q Do you recall how she suggested that?

3 A I don't.

4 Q Do you recall Ms. Slate suggesting

5 somehow that Ms. Lively had also had some 01:20:54

6 uncomfortable experiences with Mr. Baldoni or

7 Mr. Heath?

8 A Yes.

9 Q And that was in the May 29th brunch you

10 had with her? 01:21:06

11 A Correct.

12 Q You also mentioned that Ms. Slate raised

13 concerns about comments by Mr. Heath with regard to

14 her housing situation; is that right?

15 A Yes. 01:21:22

16 Q What do you recall about Mr. Heath's

17 comments regarding Ms. Slate's housing situation?

18 A All I remember -- and I don't even know

19 that I knew the details of what was happening at the

20 time because production and Wayfarer were handling 01:21:34

21 it vis-a-vis the contract. Those were the kinds of

22 conversations that I wasn't a part of on this film.

23 But it was something to the effect of, we gave you

24 more than maybe we normally would have because we

25 prioritized women with families and children because 01:21:53



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1 Q Are you aware that in some states it is 01:23:05  
2 illegal to record people without their content?

3 MS. GAROFALO: Objection.

4 MR. GLOVER: Objection, form.

5 THE WITNESS: Yes. 01:23:15

6 BY MS. ROESER:

7 Q And would you be okay with your boss  
8 recording a conversation with you without informing  
9 you in advance?

10 MS. GAROFALO: Objection. 01:23:30

11 THE WITNESS: No.

12 BY MS. ROESER:

13 Q I believe you testified that there were  
14 other nonspecific conversations that Ms. Slate  
15 raised she was uncomfortable with. 01:23:36

16 Do you recall that?

17 A I think I just covered all of them. I  
18 don't remember any further specifics.

19 Q If you'll look back to Exhibit 6, please.

20 At 11:23 a.m., you sent a text to 01:23:51  
21 Ms. Giannetti that said:

22 (As read):

23 "Yes, very bad. I think we need to  
24 replace our director. And Jamey should  
25 not be on set." 01:24:06

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1 Do you see that? 01:24:08

2 A I do.

3 Q You felt that what Ms. Slate had shared  
4 with you about Mr. Heath and Mr. Baldoni's behavior  
5 was very bad? 01:24:20

6 A Yes.

7 Q And did you think because of what Ms.  
8 Slate shared with you, that Justin should be  
9 replaced as director on the film?

10 A Yes. 01:24:32

11 Q Why?

12 A Because his actors were uncomfortable in  
13 his presence.

14 Q And in your view, it's important that  
15 actors be comfortable around the director? 01:24:44

16 A It's -- yes, and it's important that  
17 people be comfortable in their workplace.

18 Q Why did you think Jamey should not be on  
19 set?

20 A Because I knew that I was more than 01:25:02  
21 capable of running the movie; they just weren't  
22 letting me. And so his presence was actually not  
23 needed. So if he was making someone so  
24 uncomfortable, I didn't see the reason for him to be  
25 there. 01:25:20

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1 Q And similar to Mr. Baldoni, did you 01:25:28  
2 believe that -- strike that.

3 Did you believe that excluding Mr. Heath  
4 from set would make actors more comfortable in their  
5 workplace? 01:25:40

6 A For at least Jenny, yes.

7 Q Was Mr. Heath excluded from set going  
8 forward?

9 A No.

10 Q Why not? 01:25:51

11 A I don't know.

12 Q Was Mr. Baldoni replaced as director on  
13 the film?

14 A No.

15 Q Why not? 01:25:59

16 A I don't know.

17 Q Other than Ms. Giannetti, did you raise  
18 to anyone else the idea that Mr. Baldoni should be  
19 replaced as director on the film because his actors  
20 were not comfortable with him? 01:26:11

21 A No. Ange told me that there was no way  
22 that would ever happen.

23 Q So you informed Ms. Giannetti that actors  
24 were uncomfortable in their workplace due to  
25 Mr. Heath and Mr. Baldoni's behavior, and her 01:26:23

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1 response was, there's no way that would ever happen, 01:26:27  
2 or something to that effect?

3 A Yeah. That Sony's hands were tied; they  
4 had no control over the movie. And that Wayfarer  
5 would never replace themselves. 01:26:37

6 Q Other than Ms. Giannetti, did you raise  
7 to anyone that Mr. Heath should be excluded from set  
8 because actors were uncomfortable in his presence?

9 A Probably the line producer, Andrea, but  
10 otherwise, no. 01:26:55

11 Q Did you ever raise to Mr. Heath that  
12 Mr. Baldoni should be replaced because actors were  
13 comfortable -- uncomfortable with his presence on  
14 set?

15 A No. 01:27:15

16 Q Why not?

17 A Because Justin was Jamey's boss.

18 Q And did you ever raise to Justin that you  
19 felt he should be replaced as director, and his  
20 actors weren't comfortable in his presence? 01:27:26

21 A No.

22 Q Why not?

23 A Because he was my boss.

24 Q Did you feel like you didn't have anyone  
25 else to raise these to? 01:27:37

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1 A Correct. 01:27:39

2 Q And just to be clear, you felt that there  
3 was no other avenue, other than Ms. Giannetti, to  
4 raise your concerns that actors were uncomfortable  
5 in the presence of Mr. Heath, the CEO of the studio, 01:27:53  
6 and Mr. Baldoni, the director of the film?

7 A Correct. Other than strongly encouraging  
8 Jamey and Justin to do an investigation, that was  
9 all.

10 Q Did you raise to Mr. Baldoni that 01:28:12  
11 Mr. Heath should be removed from production?

12 A No.

13 Q Because Mr. Baldoni was your boss and  
14 Mr. Heath was his partner?

15 A And because Mr. Baldoni put Jamey on the 01:28:22  
16 movie as a producer after he had already hired me.

17 Q Why did that impact your decision not to  
18 raise to Mr. Baldoni that Mr. Heath should be  
19 excluded from set due to the actor's discomfort with  
20 his presence? 01:28:37

21 A Because if Justin felt I could do the job  
22 on my own, he wouldn't have put Jamey on the movie  
23 in the first place.

24 Q Did you encourage Mr. Baldoni and  
25 Mr. Heath to conduct an investigation with regard to 01:28:50

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1 Q Okay. So after you had brunch with Jenny 01:31:11  
2 and she raised concerns about Mr. Baldoni and  
3 Mr. Heath's behavior, you had a Zoom with  
4 Mr. Baldoni and Mr. Heath to discuss Jenny's  
5 concerns? 01:31:23

6 A Correct.

7 Q And during that Zoom, did you share with  
8 them that Ms. Slate had concerns with respect to  
9 Mr. Baldoni's comments about her appearance,  
10 comments made by Mr. Heath, and other items as well? 01:31:35

11 A Yes.

12 Q How did they react?

13 A They actually took it very well. In  
14 terms of, they didn't, at the time, deny or get  
15 defensive about it. They just seemed to be taking 01:31:55  
16 it in. And that made it not as challenging of a  
17 conversation for me to be having with them, which I  
18 appreciated.

19 Q When you suggested or recommended that an  
20 investigation be performed, how did Mr. Baldoni 01:32:14  
21 respond?

22 A He was very open to it.

23 Q Do you recall what he said specifically?

24 A I don't remember the exact words, but  
25 something to the effect of, I'm -- I'm happy to do 01:32:23

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1 it. I -- you know, I should take responsibility for 01:32:30  
2 things I've done. That kind of language.

3 Q During that Zoom call following your  
4 brunch with Ms. Slate, did you also raise that  
5 Ms. Lively had certain concerns about Mr. Baldoni 01:32:41  
6 and Mr. Heath's behavior?

7 A No, because I didn't know that for sure  
8 yet.

9 Q How did Mr. Heath react to your  
10 recommendation that an investigation into his and 01:32:51  
11 Mr. Baldoni's behavior be -- be conducted?

12 A He heard it and said that they needed to  
13 talk about it.

14 Q Did you ever hear from Mr. Heath after  
15 that conversation about whether they were, in fact, 01:33:03  
16 going to conduct an investigation into his and  
17 Mr. Baldoni's conduct?

18 A Not proactively, but we obviously talked  
19 about it again, whether it was because I brought it  
20 up. I -- I think I brought it up to kind of check 01:33:17  
21 in on it. And then at some point, he did let me  
22 know that they weren't going to do an investigation.

23 Q Did he -- so after this initial Zoom call  
24 where you shared Ms. Slate's concerns with  
25 Mr. Baldoni and Mr. Heath, you had another follow-up 01:33:40

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1 conversation with Mr. Heath and Mr. Baldoni about 01:33:43  
2 concerns regarding their behavior on set?

3 A It was probably just Jamey.

4 Q Okay.

5 A And it was probably a nonspecific call. 01:33:53  
6 I believe at that point we were probably on the  
7 phone multiple times a day, and was coming up in the  
8 course of various other conversations.

9 Q So the follow-up discussion, you recall  
10 being just with Mr. Heath? 01:34:11

11 A Yes, I believe so.

12 Q And it was on the phone?

13 A Uh-huh.

14 Q Mr. Heath shared with you during that  
15 follow-up conversation that Wayfarer would not be 01:34:20  
16 investigating concerns about his behavior or  
17 Mr. Baldoni's behavior?

18 A That was the final call about it. There  
19 was I believe one in the middle where we were just  
20 talking about it, about the possibility of doing it 01:34:32  
21 again.

22 Q What do you recall about the middle call?

23 A Not much. Probably just me pushing for  
24 it to happen again.

25 Q Why were you pushing for an investigation 01:34:45

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1 to occur? 01:34:47

2 A Because I wanted the behavior to be taken  
3 seriously. And also, since I hadn't been there to  
4 see any of it, it's the way that you sort of address  
5 and handle these things, and could hopefully make 01:35:03  
6 for a more comfortable work environment for everyone  
7 going forward.

8 Q Based on your conversation with  
9 Ms. Slate, did you believe that she was genuinely  
10 uncomfortable with Mr. Baldoni and Mr. Heath's 01:35:16  
11 behavior?

12 A Yes.

13 Q Did Mr. Heath ever explain why Wayfarer  
14 would not be conducting an investigation into  
15 Ms. Slate's concerns about Mr. Heath's and 01:35:27  
16 Mr. Baldoni's behavior?

17 A Not -- sort of tapdanced around the idea  
18 that it would be better for all of this not to be on  
19 an official record.

20 Q Do you have an understanding what that -- 01:35:47  
21 what does that mean to you?

22 A That he didn't want the behavior written  
23 down, documented anywhere, in the event that someone  
24 wanted to talk about it again in the future.

25 Q Your impression is that Mr. Heath did not 01:36:02

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1 want Wayfarer to conduct an investigation into 01:36:05  
2 concerns about his and Mr. Baldoni's behavior  
3 because he didn't want a written record of it  
4 anywhere?

5 A Correct. 01:36:13

6 Q What do you recall Mr. Heath saying -- do  
7 you recall Mr. Heath saying anything specifically  
8 that gave you that impression?

9 A No.

10 Q But that's your recollection of the -- of 01:36:31  
11 why Wayfarer decided not to conduct an investigation  
12 into the behavior raised by Ms. Slate?

13 A Yes.

14 Q Direct your attention back to Exhibit 6,  
15 please. At 12:13, you send a text to Ms. Giannetti 01:36:53  
16 that says:

17 (As read):

18 "Texted Blake. No answer yet."

19 Do you see that?

20 A Yes. 01:37:01

21 Q Why did you -- do you have a recollection  
22 of texting Blake at that time?

23 A I don't.

24 Q Do you recall why you would have been  
25 texting Ms. Lively on May 29th after just having 01:37:11

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1 please. 01:54:38

2 Direct your attention to the message at

3 9:35 a.m.

4 A Yes.

5 Q On June 1st, at 9:35 a.m., you sent 01:54:57

6 Ms. Giannetti a text stating:

7 (As read):

8 "We had a very good (tough) chat with

9 Blake. She was eloquent and on point.

10 Called Jamey out in front of me and 01:55:08

11 Justin, kindly."

12 Do you see that?

13 A Yes.

14 Q What are you referring to here?

15 A I believe this was a meeting in her 01:55:17

16 trailer about the concerns.

17 Q On or around June 1st, you had a meeting

18 in Ms. Lively's trailer?

19 A That's what it looks like. I did not

20 remember it. 01:55:39

21 Q Do you recall who was at that meeting?

22 A I don't. I don't, but I assume me,

23 Jamey, Justin, and Blake.

24 Q Does this message you sent, that

25 Ms. Lively called out Jamey and Justin in front of 01:55:51

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1 you, refresh your recollection that you, Jamey, 01:55:55  
2 Justin, and Ms. Lively had a meeting on June 1st?

3 A It does a little, but we had so many  
4 meetings over the course of the shoot, that I -- I'm  
5 not certain I'm remembering the exact one. 01:56:08

6 Q So do you remember a discussion of the  
7 meeting, but not necessarily where it took place?

8 A No.

9 Q Do you remember a situation in which  
10 Ms. Lively called out Mr. Heath and Mr. Baldoni in 01:56:22  
11 front of you?

12 A Not -- now I'm remembering, but I don't  
13 remember many of the specifics. But I think I  
14 remember that this was in her trailer.

15 Q What do you remember about what 01:56:35  
16 Ms. Lively said during that meeting?

17 A Very little, other than what I wrote. I  
18 remember her -- all I remember is her leaning  
19 against one side of the trailer. I think I was  
20 opposite her. Maybe Justin was here and maybe Jamey 01:56:49  
21 was there. And I do remember, now that I'm reading  
22 it, that she -- I don't remember the specifics of  
23 even what she said. I would have to keep reading,  
24 but that she was very direct but professional. And  
25 that was it. 01:57:08

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1 Q If you turn to the message at 9:37 a.m., 01:57:13  
2 please. Ms. -- sorry. On the other page,  
3 9:37 a.m., you write:

4 (As read):

5 "He did try to clarify that he thought 01:57:29  
6 Justin told her about it."

7 And Ms. Giannetti responds:

8 (As read):

9 "This is the wife photo?"

10 Do you see that? 01:57:38

11 A I do.

12 Q Do you recall Ms. Lively raising to you,  
13 Mr. Baldoni, and Mr. Heath, that she was  
14 uncomfortable with Mr. Heath showing her a video of  
15 his nude wife? 01:57:47

16 A Yes. And I believe it was in this  
17 meeting, she brought up that she had been shown a  
18 video of Jamey's wife giving birth.

19 Q And did you understand Mr. Heath's wife  
20 to be nude in that video? 01:58:11

21 A Yes.

22 Q Did you ever watch the video?

23 A No.

24 Q Did you understand that Ms. Lively was  
25 uncomfortable with being shown a video of his -- her 01:58:18

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1 boss's wife giving birth nude? 01:58:21

2 MS. GAROFALO: Objection.

3 THE WITNESS: I believe she shared that  
4 at the time.

5 BY MS. ROESER: 01:58:28

6 Q Did you think it was appropriate for  
7 Mr. Heath to show Ms. Lively a video of his wife  
8 giving birth nude?

9 MS. GAROFALO: Objection.

10 THE WITNESS: No. 01:58:40

11 BY MS. ROESER:

12 Q Do you want your boss to show you a video  
13 of his wife giving birth nude?

14 MS. GAROFALO: Objection.

15 THE WITNESS: No. 01:58:44

16 BY MS. ROESER:

17 Q You wrote:

18 (As read):

19 "He did try to clarify that he thought

20 Justin told her about it." 01:58:48

21 Did you mean that Mr. Heath tried to  
22 clarify that he showed Ms. Lively a video of his  
23 nude wife because Justin asked him to?

24 A I believe he was trying to clarify that

25 he thought Justin had told her, this is what the 01:59:07

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1 video is and that she had wanted to see it. 01:59:12

2 Q Mr. Heath thought Ms. Lively wanted to  
3 see -- Mr. Heath said to you something to the effect  
4 that he thought Ms. Lively wanted to see a video of  
5 his nude wife? 01:59:25

6 MS. GAROFALO: Objection.

7 THE WITNESS: It -- that's what it  
8 sounded like in the room just from what I'm reading.  
9 I don't remember.

10 BY MS. ROESER: 01:59:35

11 Q At 9:38 you wrote:

12 (As read):

13 "Yes, and there were other comments."

14 As you sit here, do you have a  
15 recollection of what other comments Ms. Lively 01:59:42  
16 raised concerns about during the meeting with you,  
17 Mr. Heath, and Mr. Baldoni?

18 A I don't.

19 Q At 9:42 a.m. you wrote:

20 (As read): 01:59:54

21 "The other piece was that she was like,  
22 you, Jamey, make jokes about how you  
23 can't make eye contact with people  
24 anymore, as if to undermine and lessen  
25 the importance of people not wanting to 02:00:04

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1 be comfy/cozy on set." 02:00:08

2 Do you see that?

3 A Yes.

4 Q What do you recall Ms. Lively sharing

5 with regard to that statement? 02:00:16

6 A There was a lot of hugging and touching

7 amidst the Wayfarer team. It's just seemingly sort

8 of how they do business and interact with each

9 other. And it sounds like she was referring to how

10 sometimes the guys would make jokes about how they 02:00:32

11 couldn't do that. But not really that, it would --

12 the joke would be, can't even make eye contact with

13 people anymore.

14 And she used that as an example to say,

15 everything is too comfortable on set. Can we make 02:00:46

16 it more professional?

17 Q In your view, the comment that Ms. Lively

18 raised about Mr. Heath and Mr. Baldoni joking that

19 you can't make eye contact with people anymore, did

20 you view that to undermine and lessen the importance 02:01:43

21 of people wanting to be comfortable in the

22 workplace?

23 MS. GAROFALO: Objection.

24 THE WITNESS: Yes.

25

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1 BY MS. ROESER: 02:02:03

2 Q Do you think it was appropriate for the  
3 two men in charge of the production to joke about  
4 not being able to make eye contact with people  
5 because of HR? 02:02:12

6 MS. GAROFALO: Objection.

7 THE WITNESS: Can you repeat the  
8 beginning of the question?

9 BY MS. ROESER:

10 Q Did you think it was appropriate for two 02:02:20  
11 men in charge of the production to joke about not  
12 being able to make eye contact with people anymore?

13 MS. GAROFALO: Objection.

14 THE WITNESS: No.

15 BY MS. ROESER: 02:02:29

16 Q Why not?

17 MS. GAROFALO: Objection.

18 THE WITNESS: Because that's not how a  
19 workplace or the leaders of a workplace should  
20 operate. They shouldn't be making light of the 02:02:41  
21 behavior that makes their employees uncomfortable.

22 BY MS. ROESER:

23 Q And in your view, Mr. Baldoni and  
24 Mr. Heath were making light of behavior that made  
25 people uncomfortable in their workplace? 02:02:54

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1 A Through that joke. 02:02:58

2 Q And Mr. Baldoni and Mr. Heath were making  
3 light of concerns raised about their own behavior?

4 A It reads more general to me that just you  
5 can't -- you can't do anything in the workplace 02:03:12  
6 anymore and not get in trouble, than maybe more  
7 reflective of their own behavior.

8 Q In your view, does that kind of comment  
9 create an environment in which employees would be  
10 comfortable coming forward with concerns -- 02:03:27

11 MS. GAROFALO: Objection.

12 BY MS. ROESER:

13 Q -- about the behavior of their bosses?

14 MS. GAROFALO: Objection. Sorry for  
15 stepping over your question. 02:03:30

16 MS. ROESER: I'd ask you let me finish,  
17 please.

18 MS. GAROFALO: I did and I said,  
19 objection, and I apologized for stepping over your  
20 question. 02:03:40

21 MS. ROESER: I'll reask.

22 BY MS. ROESER:

23 Q In your view, does a comment, joke, about  
24 how you can't make eye contact with people anymore,  
25 create an environment in which employees would feel 02:03:48

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1 comfortable coming forward with concerns about the 02:03:53  
2 workplace?

3 MS. GAROFALO: Objection.

4 THE WITNESS: It does not make employees  
5 feel comfortable. 02:03:59

6 THE STENOGRAPHIC REPORTER: Did you say,  
7 "It does not make employees feel comfortable" or  
8 "uncomfortable?"

9 THE WITNESS: Comfortable.

10 THE STENOGRAPHIC REPORTER: Thank you. 02:04:23

11 BY MS. ROESER:

12 Q Do you recall during the meeting with  
13 Mr. Baldoni, Mr. Heath, and Ms. Lively, that  
14 Ms. Lively also raised issue with Mr. Baldoni coming  
15 into her trailer uninvited? 02:04:52

16 A Only because I'm reading it here.

17 Q At 9:43 a.m. you wrote to Ms. Giannetti:  
18 (As read):

19 "And then, she also mentioned that I  
20 guess on day two, Jamey went into 02:05:04  
21 Blake's trailer. And she was like, 'Oh  
22 actually, I'm getting body makeup done.  
23 Well, you can come in if you don't  
24 look.' And apparently he was looking  
25 in her direction the entire 02:05:16

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1 conversation when she turned around." 02:05:19  
2 Do you see that?  
3 A Yes.  
4 Q What do you recall Ms. Lively sharing  
5 with regard to that incident? 02:05:24  
6 A Nothing more than what you just read.  
7 Q So did Ms. Lively -- do you recall  
8 Ms. Lively sharing with you that Mr. Heath had  
9 barged into her trailer while she was undressed?  
10 A I don't recall. 02:05:37  
11 Q Do you recall Ms. Lively sharing whether  
12 she had clothes on at the time?  
13 A I don't recall, but if I'm saying she was  
14 getting body makeup done, then she didn't have  
15 clothes on. 02:05:51  
16 Q And to your understanding when Ms. Lively  
17 was getting body makeup done or removed, was she  
18 generally topless?  
19 MR. GLOVER: Objection, form.  
20 MS. GAROFALO: Join. 02:06:01  
21 THE WITNESS: I don't actually know.  
22 BY MS. ROESER:  
23 Q You believe that she might have been?  
24 A Correct.  
25 MS. GAROFALO: Objection. 02:06:05

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1 BY MS. ROESER: 02:06:07

2 Q Do you have a recollection of Ms. Lively  
3 specifically sharing that she was in some state of  
4 undress at the time Mr. Heath came into her trailer  
5 uninvited? 02:06:19

6 A I don't remember outside of reading this.

7 Q Do you have an understanding why  
8 Ms. Lively would say, "You can come in, but don't  
9 look," if she was wearing clothes at the time?

10 MS. GAROFALO: Objection. 02:06:33

11 THE WITNESS: Likely, because she knew  
12 the conversation was important and she was  
13 professional and probably wanted to discuss whatever  
14 needed to be discussed.

15 BY MS. ROESER: 02:06:43

16 Q Did Ms. Lively share with you that when  
17 Mr. Heath attempted to enter her trailer, she and  
18 her team yelled, "No, no, no, don't come in"?

19 MR. GLOVER: Objection, form.

20 THE WITNESS: I don't remember. 02:06:56

21 BY MS. ROESER:

22 Q Do you recall Ms. Lively sharing that  
23 Mr. Heath had insisted on having a meeting with her  
24 when he entered her trailer?

25 A I don't remember. 02:07:08

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1 Q Do you recall Ms. Lively conveying that 02:07:09  
2 she was uncomfortable with Mr. Heath looking at her  
3 while she was getting her makeup undone or done?

4 A I don't remember.

5 Q Ms. Giannetti responded to your text with 02:07:22  
6 regard to Mr. Heath entering Blake's trailer and  
7 said, "Not good." You responded, "Nope."

8 Do you see that?

9 A Correct.

10 Q What do you remember being, "not good," 02:07:37  
11 about the situation in which Mr. Heath entered  
12 Ms. Lively's trailer?

13 MS. GAROFALO: Objection.

14 THE WITNESS: That he was looking at her  
15 getting body makeup done when she asked him not to. 02:07:48  
16 BY MS. ROESER:

17 Q And was it your understanding that  
18 Ms. Lively was uncomfortable with that?

19 MS. GAROFALO: Objection.

20 THE WITNESS: That's what I perceived. 02:07:59  
21 BY MS. ROESER:

22 Q Was Ms. Lively doing something or --  
23 strike that.

24 Did Ms. Lively recount this story to you  
25 in a way that you perceived -- in a specific way 02:08:18

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1 that made you perceive she was uncomfortable? 02:08:21

2 MR. GLOVER: Objection, form.

3 MS. GAROFALO: Join.

4 THE WITNESS: Not that I can recall.

5 BY MS. ROESER: 02:08:29

6 Q What was your reaction to hearing that  
7 Mr. Heath had entered Ms. Lively's trailer uninvited  
8 and looked at her while she was getting her makeup  
9 done, body makeup done?

10 A I would imagine -- I don't recall 02:08:52  
11 exactly, but I would imagine uncomfortable, like I  
12 am rereading it now.

13 Q You're uncomfortable even rereading it  
14 now?

15 A Yes. 02:08:59

16 Q Why?

17 A Because I don't like that it happened.

18 Q Why not?

19 A Because it's not appropriate for the  
20 workplace. 02:09:05

21 Q Why is it inappropriate for the workplace  
22 for Mr. Heath to go into Ms. Lively's trailer and  
23 look at her while she's getting her body makeup  
24 done?

25 MR. GLOVER: Objection, form. 02:09:13

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1 Mr. Baldoni and Mr. Heath's behavior? 02:31:42

2 A I know that our first production designer  
3 said to me at one point that, at the end of the  
4 first round of shooting, he felt like he was leaving  
5 a cult. 02:31:59

6 Q Who was that?

7 A Russell Barnes.

8 THE STENOGRAPHIC REPORTER: Russell  
9 Barnes?

10 BY MS. ROESER: 02:32:03

11 Q Any other cast or crew members you were  
12 aware of having concerns about Mr. Baldoni and  
13 Mr. Heath's behavior?

14 A Specifically, no. But in general, a lot  
15 of the crew felt the production was being run in a 02:32:23  
16 way that wasn't up to industry standard.

17 Q What do you mean by "up to industry  
18 standard"?

19 A That they just did things a little  
20 differently. Yeah, which I think mostly was due to 02:32:36  
21 the inexperience.

22 Q Do you -- are you aware of other cast or  
23 crew members feeling that Mr. Baldoni or Mr. Heath's  
24 behavior was inappropriate?

25 MS. GAROFALO: Objection. 02:32:52

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1 Mr. Baldoni's name at Book Bonanza? 02:35:24

2 A Correct.

3 Q Did you have an understanding why

4 Ms. Hoover would not say Mr. Baldoni's name at Book

5 Bonanza?

02:35:34

6 A I believe, at that point, I was aware  
7 that Blake and Colleen had discussed basically all  
8 of what had happened to Blake on the film.

9 Q Your understanding was that Ms. Lively

10 had discussed with Ms. Hoover how she had been

02:35:55

11 treated by Mr. Baldoni and Mr. Heath on the film?

12 A Correct.

13 Q And her discomfort with that treatment?

14 A Yes.

15 Q At 8:44, when you say: "Neither of them

02:36:07

16 would" mention JB's name, who else were you

17 referring to other than Ms. Hoover?

18 A I -- I assume Blake.

19 Q Is it your recollection that Ms. Lively

20 also would not say Mr. Baldoni's name at Book

02:36:28

21 Bonanza?

22 A Yes.

23 Q If you would turn to Exhibit 11, which is

24 document stamped SPE\_BL2193.

25 Do you have that in front of you?

02:36:40

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1 A Yes. 02:36:43

2 Q Do you recognize Exhibit 11 as a text

3 exchange between you and Ms. Giannetti, on

4 June 15th, 2024?

5 A Yes. 02:36:52

6 Q At 2:19 p.m., Ms. Giannetti says "call

7 me." And later on, at 2:53, you write -- she asked

8 you:

9 (As read):

10 "Did you get any details back then?" 02:37:07

11 And you respond:

12 (As read):

13 "Justin was very dismissive of her when

14 she wanted to direct and then used

15 Jamey to try and manipulate her when he 02:37:18

16 realized she could co-direct it after

17 she got daddio going."

18 Do you see that?

19 A Yes.

20 Q Do you recall what this text was in 02:37:27

21 reference to?

22 A No.

23 Q Do you recall if you and Ms. Giannetti

24 had a conversation about concerns raised by

25 Christy Hall with respect to Mr. Baldoni being 02:37:37

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1 dismissive of her? 02:37:41

2 A Yes. Now -- now, I know what it's about.

3 Q What do you recall with respect to  
4 Ms. Hall's concerns, if any, about any Mr. Baldoni?

5 A That -- yeah, that initially, he was 02:37:56  
6 dismissive of -- dismissive of her wanting to  
7 direct. I don't remember much more than that.

8 Q You write at 2:54:

9 (As read):

10 "And then she felt like he tried to use 02:38:07  
11 her for cover with Blake and Colleen a  
12 bunch."

13 Do you have an understanding of what you  
14 were referencing there?

15 A Yeah. That she was the female writer, 02:38:16  
16 and he would say, you know, that he wanted to give  
17 her the chance to -- to write her way in, et cetera.

18 Q It was your -- your impression that  
19 Ms. Hall was concerned with Mr. Baldoni using her as  
20 cover with Blake and Colleen with regard to the 02:38:43  
21 script?

22 A I guess so.

23 Q At 2:55, you wrote:

24 (As read):

25 "She just doesn't want to be associated 02:38:53

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1 with him/them." 02:38:56

2 A Yes.

3 Q What is that in reference to?

4 A That is that she didn't want to be

5 associated with Justin and Wayfarer. 02:39:01

6 Q Ms. Hall did not want to be associated  
7 with Mr. Baldoni or with Wayfarer?

8 A I believe so.

9 Q Did you know why?

10 A I believe because of everything I wrote 02:39:11  
11 previously.

12 Q Ms. Hall had shared with you that she did  
13 not want to be associated with Mr. Baldoni or  
14 Wayfarer?

15 A Yes. 02:39:20

16 Q Did Ms. Hall also share with you, as you  
17 expressed at 2:57 p.m., she didn't feel respected as  
18 a female voice on the team and on a movie like this,  
19 that felt especially bad?

20 A Yes. 02:39:33

21 Q At 2:59, Ms. Giannetti writes:

22 (As read):

23 "Just so many things stacking up people  
24 are so upset or pissed off about. I  
25 cannot believe how they just keep 02:39:42

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1 coming." 02:39:45

2 You respond:

3 (As read):

4 "I think this is where narcissism is

5 dangerous." 02:39:49

6 Do you see that?

7 A Yes.

8 Q Is this in reference to -- is your  
9 comment regarding narcissism in reference to  
10 Mr. Baldoni? 02:39:56

11 A Yes.

12 Q Did you believe Mr. Baldoni to be a  
13 narcissist?

14 A As a non-physician, yes.

15 Q Based on what? 02:40:03

16 A All the behavior I had witnessed for the  
17 preceding year and a half.

18 Q And was it your experience that so many  
19 things kept stacking up that people were upset or  
20 pissed about with respect to Mr. Baldoni and 02:40:15  
21 Mr. Heath's behavior?

22 A Can you repeat the first part? Sorry.

23 Q Was it your experience that so many  
24 things kept stacking up that people were upset or  
25 pissed about with respect to Mr. Baldoni or 02:40:26

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1 Mr. Heath's behavior? 02:40:29

2 A Yeah.

3 Q At 3:01, you write:

4 (As read):

5 "It's only when Jamey/this isn't fair 02:40:36

6 nonsense and revisionist history comes

7 up that I'm like, come on, guys."

8 What did you mean by "Jamey/this isn't

9 fair nonsense and revisionist history"?

10 A I would assume it's the, we didn't do 02:40:50

11 anything wrong, as opposed to remembering what

12 happened.

13 Q It was Mr. Heath and Mr. Baldoni's

14 attitude that they didn't do anything wrong that you

15 were referring to as revisionist history? 02:41:08

16 A I believe so.

17 Q At 3:01, you write:

18 (As read):

19 "Him and Jamey have a way of making

20 women feel like shit." 02:41:15

21 Do you see that?

22 A And some men, yes.

23 Q Was it your experience that Mr. Baldoni

24 and Mr. Heath had a way of making women on the set

25 feel like shit? 02:41:24

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1 A A couple that -- the couple that came to 02:41:25  
2 me that we've talked about and myself, yes.

3 Q And you felt like it was deep because  
4 Mr. Baldoni and Mr. Heath wrote the checks?

5 A Yes. 02:41:37

6 Q And it was -- it was deep for you because  
7 Mr. Baldoni and Mr. Heath wrote the checks, right?

8 A Yes.

9 Q And they made you feel like shit?

10 A Yes. 02:41:49

11 Q If you go down to the message at  
12 3:03 p.m., please, you write:

13 (As read):

14 "I remember you calling me around 2:00  
15 one night being like, what the fuck, 02:42:01  
16 because so much of it was these  
17 minuscule micro aggressions."

18 Do you see that?

19 A Yes.

20 Q Was it your experience that Mr. Heath and 02:42:09  
21 Mr. Baldoni continued to engage in micro aggressions  
22 during the second stage of filming?

23 A From what I remember, it was much better  
24 on the second round. But I will be honest, I don't  
25 remember with great specificity. 02:42:23

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1 Q At 3:05, you write: 02:42:27

2 (As read):

3 "Do you remember when I called

4 Andy Davis a few weeks in and was like,

5 'Andy, he's inviting the department 02:42:33

6 heads to go to the Russian baths with

7 him?'"

8 Do you see that?

9 A Yes.

10 Q What is that in reference to? 02:42:37

11 A At the beginning of prep, Justin was

12 going to a Russian bath in New Jersey for

13 relaxation, and was very excited about it. Came

14 into one of our scout vans and said that he wanted

15 to bring everyone with him at some point. 02:42:53

16 Q Do you think it was appropriate for

17 Mr. Baldoni to invite cast and crew to Russian baths

18 with him?

19 A I didn't, but that's why I called Andy

20 Davis to confirm. 02:43:09

21 Q You did not think it was appropriate?

22 A I didn't. But I wanted to call him to

23 confirm, and then I spoke to Jamey about it.

24 Q And did Mr. Davis confirm that

25 Mr. Baldoni inviting cast and crew to Russian baths 02:43:19

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1 with him was, in fact, not appropriate behavior in 02:43:24  
2 the workplace?

3 MS. GAROFALO: Objection.

4 THE WITNESS: Correct.

5 BY MS. ROESER: 02:43:29

6 Q What did Jamey say when you raised to him  
7 that Mr. Baldoni had invited cast and crew to the  
8 Russian baths with him?

9 A That -- I don't remember if he said it  
10 was appropriate or inappropriate, but he said that 02:43:37  
11 he would talk to Justin, and I believe he did.

12 Q At 3:06, Ms. Giannetti wrote:

13 (As read):

14 "Everybody has something weird,  
15 uncomfortable and bad to say." 02:43:50

16 Do you see that?

17 A Yes.

18 Q So your experience that everybody had  
19 something weird, uncomfortable and bad to say with  
20 respect to Mr. Baldoni and Mr. Heath on set? 02:43:57

21 A I didn't talk to everyone about it, but  
22 the people that I did, yes.

23 Q Fair to say, most people?

24 A Yes.

25 Q Around the time of Book Bonanza, did you 02:44:35

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1 come to understand that certain cast and crew did 02:44:37  
2 not want to appear in press and promotion with  
3 Mr. Baldoni?

4 A Yes.

5 Q Who? 02:44:42

6 A I don't remember exactly, but I want to  
7 say everyone except Hasan.

8 Q Would that have been Ms. Lively,  
9 Ms. Slate, Ms. Ferrer, Mr. Sklenar and Ms. Hoover  
10 who did not -- and Ms. Hall who did not want to 02:44:59  
11 appear in press or promotion with Mr. Baldoni?

12 A Correct.

13 Q Did you have an understanding as to why  
14 those individuals did not want to appear in press or  
15 promotion with Mr. Baldoni? 02:45:09

16 A I believe because of everything that had  
17 transpired or what they had heard had transpired.

18 Q You believed that Ms. Lively did not want  
19 to appear in press or promotion with Mr. Baldoni  
20 because of what she perceived to be inappropriate 02:45:19  
21 and uncomfortable behavior by Mr. Baldoni and  
22 Mr. Heath on set?

23 A That was my assumption.

24 Q Same for Ms. Slate?

25 A Yes. 02:45:32

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1 that Christy Hall won't do press with Justin, right? 02:47:37

2 A Correct.

3 Q At 7:35, you write to the group:

4 (As read):

5 "They all hate him." 02:47:45

6 Who was that in reference to?

7 A What was the time stamp on that?

8 Q 7:35.

9 A Oh. I assume Blake, Brandon, and

10 Isabella. 02:48:01

11 Q During Book Bonanza, was a cut of the  
12 film screened?

13 A Yes.

14 Q And did the audience have a huge  
15 reaction? 02:48:12

16 A Yeah.

17 Q Standing ovations?

18 A Yes, from what I remember.

19 Q If you turn, please, to your message at

20 11:18 p.m. It will be on the next page. 02:48:20

21 A Yup.

22 Q You write:

23 (As read):

24 "Strongest cut thus far."

25 Do you see that? 02:48:33

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1 A Uh-huh. 02:48:33

2 Q Was it your opinion that the cut screened  
3 at Book Bonanza was the strongest cut of the film  
4 you had seen so far?

5 A Yeah. 02:48:39

6 Q And was that the cut created by  
7 Ms. Lively?

8 A I actually don't remember.

9 Q Do you have any reason to believe that it  
10 was the cut of the film that was created by 02:48:45  
11 Mr. Baldoni?

12 A I don't think so because of the date.

13 Q Was Mr. Baldoni at Book Bonanza?

14 A No.

15 Q Ms. Lively was, though, right? 02:48:53

16 A Correct.

17 Q If you can turn to Exhibit 11, I mean,  
18 sorry, 13, which is a document bearing Bates BL8042.

19 Do you recognize this document as a text  
20 chain between you and Ms. Lively on June 15th to 02:49:19  
21 16th, 2024?

22 A Yes. Yup.

23 Q If you turn, please, to your text at  
24 3:04 a.m. In the middle of the message, you write:

25 (As read): 02:49:33

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1 "The cut is EXCELLENT. Like I said, 02:49:33  
2 the best thus far. Truly beautiful.  
3 Beautiful work, Blake. I think this  
4 last leg of the journey is going to be  
5 really sweet for everyone and that's 02:49:46  
6 because of you. Colleen might be the  
7 mother, but you're the fucking fairy  
8 godmother for everyone. I am always at  
9 your disposal for whatever you need,  
10 creatively or otherwise. I'm 02:49:54  
11 incredibly proud of this film."

12 Does that text refresh your recollection  
13 with respect to whether the cut screen at Book  
14 Bonanza was the cut that Ms. Lively created?

15 A Yes. 02:50:09

16 Q Do you recall that, in connection with  
17 releasing the film, Wayfarer had compiled or  
18 developed a companion book?

19 A Yes.

20 MS. ROESER: Okay. I'm giving you what 02:50:32  
21 is marked as Exhibit 14.

22 (Exhibit 14 marked for identification.)

23 BY MS. ROESER:

24 Q Exhibit 14 is a document stamped Wayfarer  
25 6823 through 6831. The front page is a email dated 02:51:02

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1 A Or the writer, I don't remember. 02:55:24

2 Q Fair enough. Mr. Heath writes:

3 (As read):

4 "I'm sending you Alex's notes. While

5 there are some that are worth 02:55:34

6 discussing, I want you to know that she

7 is not always the best with bedside

8 manner, so please read her note with

9 that in mind. She is not a

10 decision-maker when it comes to this." 02:55:42

11 Do you see that?

12 A Uh-huh.

13 Q Does it surprise you that Mr. Heath would

14 send your notes to the editor or writer of the

15 coffee table book and represent that you are not a 02:55:52

16 decision-maker?

17 A No.

18 Q Why?

19 A Because I wasn't one.

20 Q Is that consistent with your experience 02:55:58

21 that Mr. Heath and Mr. Baldoni sidelined you as a

22 producer in connection with the film?

23 A Completely.

24 MS. ROESER: You can set that aside.

25 Handing you Exhibit 15. 02:56:20

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1 that you received at the time? 02:57:36

2 A Yes.

3 MS. ROESER: You can set that aside.

4 Handing you Exhibit 16.

5 (Exhibit 16 marked for identification.) 10:15:44

6 BY MS. ROESER:

7 Q Exhibit 16 is a document bearing

8 Bates AS701. This appears to be an email from you

9 to Todd Black, Justin Baldoni and Jamey Heath on

10 November 22nd, 2023. 02:58:09

11 Do you see that?

12 A Yes.

13 Q Do you recognize this email?

14 A Yes.

15 Q There's an attachment to this email, 02:58:16

16 titled "Notes for IEWU 3 Week Director's Cut

17 Screening," right?

18 A Yes.

19 Q And the attachment, do you know whose

20 notes these are? 02:58:29

21 A I don't.

22 Q Do you recall if you wrote these notes?

23 A I don't.

24 Q The notes are describing the director's

25 cut, correct? 02:58:39

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1 A Yes. 02:58:43

2 Q Do you recall whether Mr. Baldoni, in  
3 fact, wrote these notes that are attached to the  
4 email?

5 A I really don't. 02:58:48

6 Q In the first paragraph, the notes read:  
7 (As read):

8 "This is now a PG-13 film through and  
9 through. All swearing has been removed  
10 aside from one F-word placed in a very 02:58:58  
11 important moment in a non-sexual way.  
12 Making this film PG-13 has proven,  
13 without a doubt, to be what's best for  
14 the film and the audience."

15 Was that your view with respect to the 02:59:11  
16 PG-13 rating of the film?

17 A I think -- I think at the time I was  
18 supportive of PG-13. I mean, that's almost always  
19 better for a mass audience for films. We originally  
20 were supposed to make an R-rated movie, and so that 02:59:33  
21 was a little controversial internally when it needed  
22 to change. But I believe I supported the PG-13.

23 Q And did you say PG -- PG-13 is almost  
24 better for mass audience -- audience for films, why  
25 is that? 02:59:57

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1           A     Because it can reach more people. More     02:59:57  
2     people can go see it. A younger audience can go see  
3     it.

4           MS. ROESER: Do you -- I'm handing you  
5     Exhibit 17.     03:00:07

6           (Exhibit 17 marked for identification.)

7     BY MS. ROESER:

8           Q     And while that's passed around, I will  
9     ask you a question, not yet about the exhibit, we'll  
10    wait for everyone else to have it.     03:00:16

11           But do you recall a meeting on or around  
12    January 4th, 2024 at Ms. Lively's home in which  
13    she expressed concerns with respect to Mr. Baldoni  
14    and Mr. Heath's behavior on set?

15           A     Yes.     03:00:33

16           Q     Can you please turn to paragraph 20 in  
17    that complaint.

18           MS. CATERINA: You said 20?

19           MS. ROESER: Yeah, paragraph 20. Page 7.

20    BY MS. ROESER:     03:00:45

21           Q     At paragraph 20, page 7, there is a  
22    screenshot of notes that have 30 points there. If  
23    you could take a minute and read through those. My  
24    question for you will be whether the 30 points  
25    identified on that page are consistent with what you     03:01:06

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1 recall Ms. Lively speaking to you during the 03:01:10

2 January 4th meeting.

3 Ready?

4 A Yes.

5 Q Are the 30 points identified in paragraph 03:03:03

6 20 of that complaint consistent with what you recall

7 Ms. Lively speaking to you during the January 4th

8 meeting?

9 A I don't remember every point, one by one.

10 I remember most of them.

03:03:16

11 Q Okay. You can set that aside.

12 Was Ms. Lively eventually awarded a PGA

13 producer's mark for her work on It Ends with Us?

14 A Yes.

15 Q You submitted a letter in support of her 03:03:29

16 obtaining that producer's mark, correct?

17 A Yes.

18 Q Did you also speak with other cast and

19 crew members about submitting letters on

20 Ms. Lively's behalf to obtain a PGA producer's mark? 03:03:39

21 A I spoke with other crew.

22 Q Other crew. Okay. Thank you.

23 MS. ROESER: What exhibit are we on,

24 Ashley?

25 THE STENOGRAPHIC REPORTER: Hold on.

03:04:08

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1 you received from Ms. Ajemian in support of 03:04:52

2 Ms. Lively's producer's mark?

3 A Yes.

4 Q Exhibit 19 is marked AS1088.

5 Do you recognize this as a June 26, 2024 03:05:01

6 email and the attachment, a letter that you received

7 from Russell Barnes in support of Ms. Lively's PGA

8 producer mark?

9 A Yes.

10 Q Exhibit 20. Do you recognize Exhibit 20 03:05:16

11 as an email from Mr. Barry Peterson to you on

12 June 22nd, 2024?

13 A I don't have that one.

14 MS. GAROFALO: We have a 20, but it's

15 what you just discussed, AS1088. 03:05:31

16 BY MS. ROESER:

17 Q Oh. Do you have AS1094?

18 A No.

19 MS. CATERINA: None of us do.

20 BY MS. ROESER: 03:05:49

21 Q Did you agree, based on your experience,

22 that Ms. Lively deserved the PGA producer's mark

23 that she was awarded in connection with the film?

24 A Yes.

25 MS. ROESER: No further questions for 03:06:00

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1 was Mr. Heath -- someone commenting that -- oh, 04:21:53  
2 Mr. Baldoni -- looked hot or looked sexy. Was she  
3 in costume?

4 A I believe so.

5 Q Okay. So he wasn't commenting on her 04:22:07  
6 street appearance, correct?

7 MS. ROESER: Objection.

8 THE WITNESS: Correct.

9 BY MS. GAROFALO:

10 Q And do you know whether the character, at 04:22:12  
11 that moment, was going to be in a scene that  
12 included sexual content?

13 MS. ROESER: Objection.

14 THE WITNESS: Her character was never in  
15 a scene with sexual content. 04:22:21

16 BY MS. GAROFALO:

17 Q Ms. Slate's?

18 A Correct.

19 Q Okay. Let's have the same questions with  
20 Ms. Lively. 04:22:28

21 Are you aware that Ms. Lively complained  
22 that Mr. Baldoni said she looked sexy?

23 A Yes.

24 Q And was she in costume at the time?

25 MS. ROESER: Objection. 04:22:37

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1 BY MS. GAROFALO: 04:29:06

2 Q And there had been an incident before  
3 where he interrupted you on a Zoom call?

4 A Yes. It was -- I think it was a phone  
5 call. 04:29:12

6 Q Okay. And that did not please you very  
7 much, correct?

8 A Correct.

9 Q And you told Mr. Baldoni, right?

10 A No, I actually didn't. 04:29:21

11 Q But he apologized to you, didn't he?

12 A He did.

13 Q So he knew or felt that he had been  
14 impolite; is that the right word?

15 MS. ROESER: Objection. 04:29:34

16 THE WITNESS: Yeah.

17 BY MS. GAROFALO:

18 Q And apologized to you?

19 A Correct.

20 Q Do you think Mr. Baldoni cut you off 04:29:38  
21 during that call because you were a female?

22 MS. ROESER: Objection.

23 THE WITNESS: I don't know. But I was  
24 the only person on the set that he consistently  
25 yelled at. 04:30:03

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1 THE WITNESS: No. 05:17:05

2 BY MS. GAROFALO:

3 Q You -- you understand that -- well, do  
4 you recall when the film premiered?

5 A I do. 05:17:20

6 Q When was that?

7 A In August of 2024.

8 Q And with respect to Mr. Baldoni's  
9 presence at the premiere, had Ms. Lively made any  
10 demands? 05:17:33

11 MS. ROESER: Objection.

12 THE WITNESS: What I had been told was  
13 that they shouldn't be on the carpet together, and  
14 that they would be in a separate theater and would  
15 be having a separate party. 05:17:44

16 BY MS. GAROFALO:

17 Q Were you aware of efforts by Ms. Lively  
18 to have the cast and crew de-friend Mr. Baldoni on  
19 social media at about this time?

20 MS. ROESER: Objection. 05:17:53

21 THE WITNESS: I was not, until the press  
22 started reporting about it.

23 BY MS. GAROFALO:

24 Q And do you know, as you sit here today,  
25 whether or not that's accurate? 05:18:02

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1 A I don't. 05:18:04

2 Q And you don't know whether or not  
3 Ms. Lively froze Mr. Baldoni out of the marketing;  
4 is that correct?

5 MS. ROESER: Objection. 05:18:17

6 THE WITNESS: I had heard that she was  
7 really running it, but I -- I didn't technically  
8 know if he was also talking to them on the side. I  
9 know marketing and publicity were like kind of  
10 sometimes just having two conversations about 05:18:30  
11 things.

12 BY MS. GAROFALO:

13 Q At around the time of the premiere when  
14 you texted that she was virtually taking over the  
15 film, did you have any discussions with Mr. Baldoni 05:18:41  
16 on the subject?

17 A So that text was -- was back in post,  
18 that was about two months before the premiere. I  
19 believe I did talk to Justin around when that sort  
20 of final takeover was happening. And I think that 05:18:57  
21 was one of our last conversations.

22 Q And what did Mr. Baldoni say to you?

23 A I think he was upset but, if I remember  
24 correctly, was kind of shockingly in good spirits  
25 and accepting of the whole thing. 05:19:14

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1 BY MS. GAROFALO: 05:24:52

2 Q Did she ever complain to you that the  
3 script did not accurately reflect the book in sum or  
4 substance?

5 A No. 05:25:00

6 Q What do you know about the entry on the  
7 list having to do with Mr. Baldoni contacting  
8 Ms. Lively's trainer?

9 A I knew about that incident really right  
10 after it happened because Justin asked Jamey and I 05:25:25  
11 to come to his apartment, and he walked us through  
12 exactly what happened. He was really shaken by it.  
13 Upset. Embarrassed. Felt trapped.

14 Q What exactly did Mr. Baldoni tell you  
15 about the incident with Ms. Lively's trainer? 05:25:48

16 A Well, he said that he had asked the  
17 trainer what her weight was because he had a back  
18 injury, and he was going to have to be lifting her  
19 in one of the intimate scenes. And I guess the  
20 trainer -- I don't even know if the trainer 05:26:09  
21 responded. But the trainer took that question and  
22 went to Ryan and Blake, and told them about it. And  
23 what had happened that day was that Ryan and Blake  
24 confronted Justin about it. It sounded like they  
25 were very upset, asked him why -- how he could 05:26:31

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1 possibly do that. 05:26:36

2 Again, I don't remember all the details,  
3 but it sounded like it went on for a bit. And then  
4 Justin was very upset, so he called Jamey and I to  
5 come hear about it. 05:26:47

6 Q Did Justin -- did Mr. Baldoni, if you  
7 know, ever apologize to Ms. Lively?

8 A I believe he did, but I don't exactly  
9 recall.

10 Q As the producer of a movie in which 05:26:56  
11 the lead actor has to lift the lead actress, did you  
12 find anything offensive about Mr. Baldoni trying to  
13 find out how much she weighed?

14 MS. ROESER: Objection.

15 THE WITNESS: I don't know that I find it 05:27:10  
16 offensive. I understand it on a practical level,  
17 but she was a woman who had just had a baby and was  
18 clearly uncomfortable with her body and her weight.  
19 So it was more of an insensitive, stupid question  
20 that maybe we could have gotten the answer another 05:27:28  
21 way.

22 MS. GAROFALO: Okay. Let's take a short  
23 break. I may be about finished.

24 THE VIDEOGRAPHER: The time is 5:27 p.m.

25 Off record. 05:27:37

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