

September 29, 2025

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1 me strike that and try to be clear.

2 When you said you understood that you
3 were required to preserve everything related to this
4 matter, Ms. Lively had allegations other than sexual
5 harassment allegations, correct?

6 A Whatever was in here, I knew I was meant
7 to preserve it, and I did that.

8 Q Okay. And you knew that those
9 preservation requirements extended to text messages
10 and social media accounts and emails, right?

11 A From the 20th of December, I knew that,
12 yes.

13 Q And including messages sent through
14 WhatsApp or Signal or other ephemeral messaging
15 platforms?

16 A I did.

17 Q Okay. And did you preserve all of your
18 messages after this point in time?

19 A I did.

20 Q You -- you have a messaging app on your
21 phone. Do you have any auto delete functions
22 enabled, so far as you know, on your text messages
23 on your phone? Your regular messaging app, not
24 Signal or WhatsApp or any other?

25 A During what time period? In general? Or

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1 my text?

2 Q In general.

3 A No.

4 Q And did you at any point during the time
5 period of July 1st, 2024 to the present, ever have
6 an auto delete function enabled on your regular
7 messaging app on your phone?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: No.

10 BY MR. GOTTLIEB:

11 Q You sometimes use Signal; is that right?

12 A I do.

13 Q And you were using Signal, at least for
14 some purposes, in July and August of 2024; is that
15 right?

16 A It is.

17 Q And Signal is not like the standard Apple
18 messaging product; is that right?

19 A I can't speak to the Apple messaging
20 product, but I know what Signal is used for.

21 Q And what is it used for?

22 A It's used to -- it's been really popular
23 especially in all of our live business over the last
24 couple of years because there is an option that you
25 can -- it auto deletes messages for private

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1 communications to deal with all clients.

2 Q Okay. That's been popular in your line
3 of work over the last couple of years?

4 A It is.

5 Q Do you use it for many clients that you
6 work for?

7 A Not all, but I used -- it's become
8 popular over the last couple of years, yes.

9 Q Okay. Not all but --

10 A Not all.

11 Q -- but a significant number?

12 A I would -- yeah. And it's becoming more
13 so, yes.

14 Q Okay. And you used Signal for
15 communications relating to the Wayfarer parties; is
16 that right?

17 A At what point?

18 Q Well, when was the first time that you
19 can remember sending or receiving a Signal message
20 that concerned Justin Baldoni, the Wayfarer parties,
21 Blake Lively, any of the things connected to this
22 case?

23 A I can't remember that.

24 Q Was it in August of 2024?

25 A I don't know.

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1 Q You don't know, as you sit here today,
2 whether you sent or received a single message on
3 Signal in August of 2024 relating to this -- this
4 matter?

5 A I don't know.

6 Q You used Signal when you communicate with
7 Jed Wallace; is that right?

8 A Amongst other things, yes.

9 Q What other things?

10 A Telephone.

11 Q What else?

12 A Text.

13 Q What else?

14 A Email.

15 Q What else?

16 A To the best of my knowledge, that's it.

17 Q Voice memos?

18 A I don't send voice memos.

19 Q Have you received voice memos from
20 Mr. Wallace?

21 A Yes.

22 Q Do any of those voice memos have an auto
23 delete function attached to them?

24 A I'm not sure.

25 Q Do you have any understanding of what the

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1 auto deleted function was set to on your Signal
2 threads, what your, sort of, standard is that you
3 use?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: On which particular thread?
6 You have to be more specific.

7 BY MR. GOTTLIEB:

8 Q Well, you don't have a recollection of
9 when you started using Signal for the Wayfarer
10 parties, right?

11 A No.

12 Q I'm trying to just ask you generally
13 because you don't have that recollection --

14 A Uh-huh.

15 Q -- if you know -- generally speaking, if
16 you have a typical period of time that you use for
17 your client work when you're using a Signal thread?

18 A I do not know.

19 Q How about with Mr. Freedman; you are on
20 Signal threads with him?

21 A I am.

22 Q And what is the typical deletion time
23 that you have set for your communications with him?

24 A I'm not sure.

25 Q Is it more than a week?

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1 A I'm not sure.

2 Q Do you have a guess?

3 A I don't have a guess.

4 Q But there is a deletion function set,
5 right?

6 A Well, it depends on which conversation
7 you're speaking about.

8 Q Okay. Do you use any other messaging
9 apps other than Signal and text and email?

10 A I do have WhatsApp on my phone, but I
11 barely use it.

12 Q Did you ever use WhatsApp for anything
13 connected to the issues in this case?

14 A Not to my knowledge.

15 Q Okay. Any other messaging apps?

16 A On this case?

17 Q Uh-huh.

18 A No.

19 Q Do you ever use Telegram?

20 A For this case?

21 Q For this case.

22 A Not to my knowledge. And if there is
23 something there, please let me know because I don't
24 really use it.

25 Q What about Proton Mail? Do you ever use

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1 A I can't remember.

2 Q Do you have a recollection of who was on
3 the first call that you had with Wayfarer?

4 A I think it was just Jamey and Jen. I
5 think.

6 Q So just Mr. Heath and Ms. Abel?

7 A Yes.

8 Q And you don't have a recollection of
9 Ms. Hanks being a part of that discussion?

10 A No.

11 Q Okay.

12 MR. GOTTLIEB: Let's look at
13 Ms. Nathan, I'm handing you what's been marked as
14 Exhibit 4. This is a document bearing the Bates
15 numbers Nathan 3795 through Nathan 3798.

16 (Exhibit 4 marked for identification.)

17 BY MR. GOTTLIEB:

18 Q This appears to be an email from Katie
19 Case to you and some other people on Friday,
20 July 26th, 2024, with some emails below it?

21 A Yes.

22 Q Do you recognize this document?

23 A I do.

24 Q What is it?

25 A This is an email sent by Katie to the

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1 Wayfarer team thanking for the call and attaching
2 the scope of work.

3 Q Okay. And if we work backwards from the
4 bottom of page 3795, the first page of this
5 document

6 A Uh-huh.

7 Q -- you see a series of emails here. The
8 first one is Thursday, July 25th, 2024 at
9 9:25 p.m.

10 Do you see that?

11 A I do.

12 Q And that's from Mr. Heath to Katie Case,
13 Tera Hanks. And then I see your email, and is that
14 Ms. Koslow's email?

15 A At the top, yes.

16 Q Okay. So Mr. Heath has sent a message to
17 you, Ms. Hanks, Ms. Case, and Ms. Koslow that simply
18 just says:

19 (As read):

20 "Thank you Katie."

21 At 9:25 p.m. on the 25th of July; is
22 that right?

23 A That is correct.

24 Q And Ms. Hanks replies, also on the 25th
25 of July, looks like around 6:30 p.m.:

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1 (As read) :

2 "I would love to jump on a Zoom now, if
3 possible. If that works, can you
4 please provide a link?"

5 Do you see that?

6 A Yes. I do.

7 Q And then you respond at 12:42 a.m. on
8 Friday July 26th, saying:

9 (As read) :

10 "Thank you so much for taking the time
11 to speak with us. Jen and our team
12 will connect tomorrow and go through
13 everything. We will aim to have a plan
14 to you by the end of tomorrow."

15 Do you see that?

16 A I do see that.

17 Q Okay. So does that mean that you had a
18 conversation with Mr. Heath and Ms. Hanks at some
19 point here in between the evening of July 25th and
20 early-early in the morning of the 26th?

21 A I don't know if we spoke early in the
22 morning of the 26th because that was -- it says
23 "Thank you so much for the time last evening," but
24 that would mean the night before. Yes.

25 Q All I'm -- okay. Fair enough. So

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1 we'll -- we'll stipulate to evening of the 25th.

2 A Yes.

3 Q You've got -- you have a meeting.

4 And then you see the top of the email is
5 Ms. Case responding, sending to you and that same
6 group with a scope of work.

7 Do you see that?

8 A Yes.

9 Q Is that is that the document that is
10 attached here with the pages 3797 and 3798 on it?

11 A If this is what's been provided to you on
12 that exact -- from our emails that you have, then
13 yes.

14 Q Okay. And you see that the -- on the
15 first page if you go back, it says "Attachments:
16 Wayfarer Studios TAG PR Scope of Work July 26th,
17 2024"?

18 A I do see that.

19 Q Okay. And then do you see the header at
20 the top of the attachment that says "Scope of Work
21 July 26, 2024"?

22 A Yes.

23 Q Okay. Does this look like the document
24 you sent over to Wayfarer Studios on that day?

25 A I'm going to trust my lawyers and say to

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1 Q Okay. Do you see in the overview, how
2 the document says:

3 (As read) :

4 "There are several potential scenarios
5 at play here, which we should be
6 prepared for should BL and her team
7 make her grievances public"?

8 A Yes.

9 Q "BL and her team" refers to Blake Lively
10 and her team?

11 A Yes.

12 Q Who did you understand Ms. Lively's team
13 to be at this time?

14 A Leslie Sloane and her publicists.

15 Q Okay. Who else besides Leslie Sloane did
16 you understand to be part of Ms. Lively's team?

17 A I didn't know anyone else.

18 Q Okay. Do you see the next sentence says:

19 (As read) :

20 "Given she was made to compromise with
21 the premiere, we feel she will move
22 forward with doing so."

23 Do you see that?

24 A Yes.

25 Q It was the -- it was TAG's view that you

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1 all believed that Ms. Lively and her team would make
2 her grievances public?

3 A Again, this is scenario planning. So
4 this is a possibility. This is not definitive.

5 Q Right. I mean, the scenarios -- I'm
6 not -- I didn't really ask you if you thought it was
7 definitive that she would do so. I'm just saying
8 what you're describing here in this first paragraph
9 is, there are scenarios that we need to be prepared
10 for should she make her grievances public --

11 A Absolutely.

12 Q -- and then we believe, given that she
13 was made to compromise with the premiere, that she
14 will move forward with doing so.

15 Do you see that?

16 A Yes.

17 Q So all I'm asking you is, it was your
18 view, or TAG's view at least at the time, that
19 Ms. Lively was going to make her grievances public;
20 is that right?

21 A No, she could. You keep on saying that
22 it's my view. This is like she could have made.
23 Yes.

24 Q (As read) :

25 "We feel she will move forward with

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: I can't speak to their
3 work. I can only speak to my work.

4 BY MR. GOTTLIEB:

5 Q Street Relations was, in fact, engaged on
6 a three-month term for \$30,000 a month; is that
7 right?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: I'm happy -- I know they
10 were engaged by Wayfarer, but if you have it, I can
11 look at the terms.

12 BY MR. GOTTLIEB:

13 Q Okay.

14 MR. GOTTLIEB: Let's look at another
15 document.

16 THE STENOGRAPHIC REPORTER: Exhibit 14.

17 (Exhibit 14 marked for identification.)

18 THE WITNESS: Thank you.

19 BY MR. GOTTLIEB:

20 Q Ms. Nathan, you've been handed what's
21 been marked as Exhibit 14.

22 A Thank you.

23 Q Take a minute to look at it. This is a
24 text message with the Bates Nos. KCASE 4802 through
25 4805. The date is August 7th, 2024.

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1 A Thank you.

2 Thank you.

3 Q Ms. Nathan, Exhibit 14 is a text exchange
4 between you and Katie Case on August 7th, 2024?

5 A Yes.

6 Q Do you see at 12:26 p.m., you write to
7 Ms. Case that you're on with Jamie and Jen about
8 social?

9 A I do.

10 Q 12:26 p.m.?

11 A Oh, yes, sorry.

12 Q You were on a call with Mr. Heath and Ms.
13 Abel about the social however we describe this,
14 the social plan?

15 A If I wrote that, yes, I was at that time.

16 Q And it looks like Ms. Case was not on
17 that call with you. She says "let me know how it
18 goes"?

19 A Yes, I see that.

20 Q You see then at 12:27 p.m., you send
21 through a draft of the text we looked at earlier
22 with the two quotes in it?

23 A I do.

24 Q And you said, "I think quote two" to
25 Ms. Case.

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1 Do you see that?

2 A I see that.

3 Q And then at 12:36 p.m., you type out:

4 (As read):

5 "30K monthly for three month minimum,
6 properly and strategically monitor
7 damaging Reddit/subreddit, X, Discord,
8 X or et cetera threads relating to
9 concerning opposition and manage the
10 narrative. This can only be done with
11 legacy admin for each platform. They
12 work for us."

13 I see that.

14 A Do you see that?

15 Q You wrote that?

16 I did.

17 A Where did you get that language?

18 Q I'm not sure where -- who sent it to me.

19 A Is there any person other than

20 Q
Jed Wallace who could have sent that to you?

21 MR. GLOVER: Objection.

22 THE WITNESS: I wasn't speaking to anyone
23 else on -- at this point for this case.

24 BY MR. GOTTLIEB:

25 Q And these -- these services are a

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1 description of services that you believe
2 Jed Wallace Jed Wallace could provide, right?

3 MR. GLOVER: Objection. Form.

4 THE WITNESS: I do not understand what
5 these services are, so -- half of them, I don't
6 understand what they are.

7 BY MR. GOTTLIEB:

8 Q Okay. What half do you understand?

9 A I understand monitoring.

10 Q Okay.

11 A I do understand the Wiki situation
12 because I've had different issues with that from my
13 other clients. That's why you need admin editors,
14 which is very aboveboard.

15 Q Okay.

16 A I don't

17 Q That's a reference to the second sentence
18 here:

19 (As read):

20 "With seasoned admin editors on
21 peripheral elements like Wikipedia and
22 fan pages"?

23 A Yes, you need to have editors to be able
24 to overlook Wikipedia these days. It's different to
25 what it used to be.

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1 Q When you say "overlook," to watch changes
2 to --

3 A To make sure the changes don't happen.
4 Because even when people add changes into your
5 pages, as I've had, it's difficult to change them
6 afterwards. It used to be easy.

7 Q What does this mean in the parenthetical
8 here:

9 (As read) :

10 "This can only be done with legacy
11 admin for each platform. They work for
12 us"?

13 A I don't know. I know what legacy admin
14 is.

15 Q What's that?

16 A Legacy admin is people that have been
17 there for a long time; hence, the Wikipedia stuff.

18 Q People who have been where for a long
19 time?

20 A Editors that can change Wiki. That's
21 what I think.

22 Q Administrators at Wikipedia?

23 A I think so.

24 Q And you notice here it says, "each
25 platform," right?

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1 A Yes.

2 Q And above in the sentence, there's a
3 reference to "Reddit"?

4 A Uh-huh.

5 Q And X?

6 A Uh-huh.

7 Q And Discord?

8 A Uh-huh.

9 Q Those are platforms that have
10 online
11 content, right?

12 A Yup.

13 Q Presumably, they have admins?

14 A I have no idea.

15 Q Have you ever had a conversation with
16 Mr. Wallace in the entire time you've known him
17 about admins at Reddit?

18 A Not to my knowledge.

19 Q X?

20 A Not to my knowledge.

21 Q Discord?

22 A I don't even know what Discord is.

23 Q Then you write:

24 (As read):

25 "Again, the real value is when you can
actively sway the algorithm with one

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1 SEO-charged hub/site."

2 Do you see that?

3 A I see that.

4 Q What does that mean?

5 A I don't know.

6 Q Why did you send this to Ms. Case to be
7 written up into a document if you didn't know what
8 it meant?

9 A This was -- this is -- this was exactly
10 this, which was the social/digital or the other one
11 with the price for hiring digital.

12 Q Okay. But you didn't -- you didn't know
13 what it meant at all?

14 A Like I said, half, some. But that's why
15 I choose to work with external vendors that know
16 about these things that I don't know about.

17 Q Do you know what it means to actively
18 sway the algorithm?

19 A I have an idea.

20 Q What is your idea?

21 A To change an algorithm. To change
22 something online.

23 Q What does it mean to do that with one
24 SEO-charged hub or site?

25 A I don't know.

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1 A Sure.

2 Q How long have you known Jed Wallace?

3 THE WITNESS: I'm so sorry. Before we do
4 this, can I use the bathroom?

5 MR. GOTTLIEB: Sure.

6 THE VIDEOGRAPHER: Off record. The time
7 is 3:48 p.m. Please disconnect your microphones
8 before you leave the table.

9 (Recess.)

10 THE VIDEOGRAPHER: The time is 4:10 p.m.
11 We're back on record.

12 BY MR. GOTTLIEB:

13 Q How long have you known Jed Wallace?

14 A I've known Jed for around between five to
15 six years.

16 Q How did you meet Mr. Wallace?

17 A Through a client.

18 Q Which client? And if you want to go AEO
19 for any of this, you're welcome to.

20 A Sure, yes. I would like to.

21 MR. FREEDMAN: Yup. We're going to go
22 AEO.

23 THE VIDEOGRAPHER: If any of the
24 participants in the Zoom room need to be removed due
25 to that, we do not have Mr. Heath present at the

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1 A I don't recall.

2 Q How about on the [REDACTED] matter?

3 What did Jed Wallace do in that matter?

4 MR. GLOVER: Objection, form.

5 THE WITNESS: I'm not too sure.

6 BY MR. GOTTLIEB:

7 Q Do you have any idea?

8 A No.

9 MR. GLOVER: Objection. Form.

10 BY MR. GOTTLIEB:

11 Q Is that by design, Ms. Nathan?

12 A Is what by design?

13 MR. FREEDMAN: Objection. Form.

14 BY MR. GOTTLIEB:

15 Q The fact that you are testifying that you
16 do not know anything about what Jed Wallace does?

17 A I didn't testify that. I said I do know
18 what I know what he does in my opinion, which is
19 work in the digital space. I know that he works
20 with people that are in active addiction and also
21 getting them into addiction-type facilities. That's
22 what I personally know.

23 Q What does "work in the digital space"
24 mean?

25 A If I knew about digital, I would be the

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1 one doing it because you can make really good money
2 doing it.

3 Q I certainly understand there's a
4 distinction between being an expert in the digital
5 space and an expert in searching and optimization
6 and experts in the various things Mr. Wallace does
7 and having a general knowledge or understanding of
8 what some of that work entails.

9 A Yes.

10 Q So is it really your testimony that apart
11 from that he works in the digital space, that you
12 don't know anything more about what that means?

13 A That's why I hire someone else to do it.
14 I do not work in the digital space. I don't even
15 barely have social media myself.

16 Q How do you --

17 A But I know it's important.

18 Q Sorry.

19 A No. I know it's important. As I
20 testified earlier, it's come to the situation right
21 now that all legal firms, including your own, hire a
22 digital service because we do not understand
23 digital. I'm finding out more every day. Maybe
24 next year, my answer might be different.

25 Q How do you know that it's not just all a

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1 fraud or a Ponzi scheme?

2 MR. GLOVER: Objection. Form.

3 THE WITNESS: I don't know.

4 BY MR. GOTTLIEB:

5 Q You don't know?

6 A How do I know? Yours how do I know?
7 I know it's digital space that I do not understand.

8 Q Do you have a view one way or the other
9 about whether Mr. Wallace is good at what he does?

10 MR. FREEDMAN: Objection.

11 THE WITNESS: Well, all the clients that
12 I have worked with him on really like Jed. They
13 really like the rapport they have with Jed and are
14 happy with the work. That's why he's used so often
15 in all the biggest legal firms, including quite a
16 few here in Los Angeles today and probably
17 elsewhere.

18 BY MR. GOTTLIEB:

19 Q You like him, right?

20 A I do like him.

21 Q He's a nice guy?

22 A He is a nice guy.

23 Q So -- okay. There's nothing else that
24 you think you can tell me -- my original question on
25 this line was about [REDACTED].

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1 MR. GOTTLEIB: Mike Gottlieb, Willkie
2 Farr & Gallagher, on behalf of Ms. Lively.

3 MR. NATHAN: Aaron Nathan from Willkie
4 Farr & Gallagher, on behalf of Ms. Lively.

5 MR. GLOVER: Joel Glover from Jackson
6 Walker for Jed Wallace and Street Relations,
7 Incorporated.

8 MS. BENSON: Summer Benson of Liner
9 Freedman Taitelman & Cooley on behalf of the
10 Wayfarer defendants.

11 MR. FREEDMAN: Bryan Freedman, same firm,
12 on behalf of the deponent, Melissa Nathan, the
13 Wayfarer parties, Jen Abel, who is present today,
14 and Steve Sarowitz, Jamey Heath, and Justin Baldoni.

15 THE VIDEOGRAPHER: Thank you. Any
16 remaining participants will be noted on the
17 transcript.

18 Will our court reporter please introduce
19 herself and swear in the witness.

20 THE STENOGRAPHIC REPORTER: Good morning,
21 everybody. Ashley Soevyn, stenographic reporter,
22 license 12019.

23 Ma'am, can I please have you raise your
24 right hand?

25 Do you solemnly state that the testimony

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1 you're about to give in this deposition will be the
2 truth, the whole truth, and nothing but the truth?

3 THE WITNESS: I do.

4 THE STENOGRAPHIC REPORTER: Great. Thank
5 you.

6 THE WITNESS: Thank you.

7 EXAMINATION

8 BY MS. SHAH:

9 Q Good morning.

10 A Good morning.

11 Q My name is Maaren Shah. You heard I
12 represent Stephanie Jones and Jonesworks in these
13 matters?

14 A Yes.

15 Q And you were just sworn in by the court
16 reporter. Again, do you understand that you, as you
17 did yesterday, have a duty today to give true and
18 accurate testimony?

19 A I do.

20 Q And you are under oath today with equal
21 force as though you were in a court of law?

22 A I understand.

23 Q Is there any reason that you can't give
24 full and complete testimony today?

25 A None.

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1 that popped up on the Internet in or around May of
2 2024 about Stephanie Jones, right?

3 A From being sent them, yes. And knowing
4 about them. Reading all the different articles,
5 yes.

6 Q Is it your testimony that you are only
7 aware of those websites because you were sent them
8 or read publicly available articles about them?

9 A It is.

10 MS. SHAH: Okay. I'm going to hand you a
11 series of documents.

12 THE WITNESS: Before you do that, can I
13 just go to the bathroom really quickly?

14 MS. SHAH: Yeah. Of course. We can take
15 a five-minute break.

16 THE VIDEOGRAPHER: Off record. The time
17 is 11:30 a.m.

18 (Recess.)

19 THE VIDEOGRAPHER: The time is 11:50 a.m.
20 We're back on record.

21 MS. SHAH: Okay. So we're going to hand
22 you a series of documents, and I'm going to read
23 them out for the record. If you'll just keep them
24 in front of you.

25 THE WITNESS: Sure.

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1 MS. SHAH: Exhibit 54 is a document
2 entitled, "Holding Clients Hostage: Stephanie Jones
3 Leaks." It's marked NATHAN_000003131.

4 (Exhibit 54 marked for identification.)

5 THE WITNESS: I see that.

6 MS. SHAH: Exhibit 55 is a document
7 entitled "Stephanie Jones Leaks," and that bears the
8 website domain <https://StephanieJoneslies.com/>.

9 (Exhibit 55 marked for identification.)

10 THE WITNESS: I see that.

11 MS. SHAH: Exhibit 56 is a document from
12 what appears to be an X account or Twitter account
13 under the name @lyingstephjones.

14 (Exhibit 56 marked for identification.)

15 THE WITNESS: I see that.

16 MS. SHAH: Exhibit 57 is what appears to
17 be a Facebook account with the banner
18 Stephanie Jones Leaks.

19 (Exhibit 57 marked for identification.)

20 THE WITNESS: I see that.

21 MS. SHAH: And Exhibit 58 is a Pinterest
22 account with the banner Stephanie Jones Leaks.

23 (Exhibit 58 marked for identification.)

24 THE WITNESS: I see that.

25

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1 BY MS. SHAH:

2 Q Okay. And you have seen each of these
3 documents in Exhibits 54 through 58 before; isn't
4 that correct?

5 A I have seen this one.

6 Q Which one is that?

7 A This is the Holding Clients Hostage.

8 Q That's Exhibit 54.

9 A I have seen 54. Is 55 from 54?

10 Q Fifty-five is different. It is another
11 website, stephaniejoneslies.com.

12 A I -- I mean, I don't know if they're the
13 same thing for me. I have not seen this before.

14 Q Which exhibit is that?

15 A Fifty-eight. I have not seen 57 before.

16 Q Okay.

17 A And I know that I was sent a Twitter, but
18 I really don't know if I have seen the majority of
19 Exhibit 56 before.

20 Q Okay. Now, you had a role in the
21 creation of the Stephanie Jones Leaks website that
22 documented in Exhibit 54, right?

23 MR. FREEDMAN: Objection.

24 THE WITNESS: No.

25

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1 BY MS. SHAH:

2 Q You asked Katie Case to write copy for
3 that website; isn't that true?

4 A That is not true.

5 Q And you also had a role in the creation
6 of publication of Exhibit 56, the X account, right?

7 A No.

8 Q You asked Katie Case to write copy for at
9 least five or six tweets that were posted on that X
10 account in Exhibit 56, right?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: No.

13 BY MS. SHAH:

14 Q Is it your under-oath testimony that you
15 had no involvement whatsoever in any shape or form
16 in anything having to do with the website in
17 Exhibit 54 and the X account in Exhibit 56?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: It is, yes.

20 BY MS. SHAH:

21 Q And if Katie Case testified to the
22 contrary, would she be lying?

23 A Yes.

24 Q Are you aware that Katie Case testified
25 that you asked her to write copy for the website in

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1 Exhibit 54?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: I was told that she did
4 testify. I did not listen to her deposition. I was
5 on a plane.

6 BY MS. SHAH:

7 Q Who told you that?

8 A I can't remember exactly who told me. It
9 would have been one of my lawyers.

10 MR. FREEDMAN: So no information from
11 your lawyers you should be disclosing.

12 THE WITNESS: Got you.

13 BY MS. SHAH:

14 Q Have you since read a transcript of her
15 testimony?

16 A I have.

17 Q You have?

18 A Yes.

19 Q And so you have read what she testified
20 about in this respect?

21 A I have.

22 Q Okay. So you're aware that she testified
23 that you communicated to her to write copy for the
24 website in Exhibit 54, including specific language
25 that Stephanie holds clients hostage, that she leaks

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1 clients' secrets, and that she treats her employees
2 poorly, amongst others; are you aware that she
3 testified that?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: I read her testimony.

6 BY MS. SHAH:

7 Q And are you aware, then, that she
8 testified that you communicated to her that she
9 should write copy for the website in Exhibit 54,
10 including specific language that Stephanie Jones
11 holds clients hostage, that she leaks client
12 secrets, and that she treats her employees poorly?

13 MR. FREEDMAN: Objection.

14 THE WITNESS: I'm aware of what she
15 testified in her deposition, yes.

16 BY MS. SHAH:

17 Q And is it your under-oath testimony that
18 when she testified that you communicated to her to
19 write copy for the website in Exhibit 54, she was
20 giving false testimony under oath?

21 A It is, yes.

22 Q Okay. And is it your under-oath
23 testimony that when she testified in her deposition
24 that you gave her specific language to write for
25 this website, including that Stephanie Jones holds

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1 clients hostage, that she leaks clients' secrets,
2 and that she treats her employees poorly, that she
3 was giving false under-oath testimony?

4 A Yes.

5 MR. FREEDMAN: Objection.

6 BY MS. SHAH:

7 Q Okay. Are you aware that Katie Case
8 testified that she received a call from you in early
9 May and communicated to her that a website that
10 became the website in Exhibit 54 had been requested?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: Am I aware that she
13 testified that?

14 BY MS. SHAH:

15 Q Uh-huh.

16 A I don't actually recall that bit, but if
17 it's in her testimony, then yes.

18 MS. SHAH: Okay. We're going to need to
19 go on AEO.

20 MR. FREEDMAN: Okay.

21 BY MS. SHAH:

22 Q Have you read the entirety of Katie
23 Case's deposition transcript?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: I think so.

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1 Q Okay. At [REDACTED]

2 A Yes.

3 Q If Katie Case testified that you asked
4 her to draft the tweets about Stephanie Jones that
5 appeared in Exhibit 56, the outlying Steph Jones X
6 account --

7 A Uh-huh.

8 Q -- is it your under-oath testimony that
9 Katie Case was giving false under-oath testimony?

10 A About me, yes, absolutely.

11 Q Okay. Do you have any personal knowledge
12 about whether or not Katie Case did write the copy
13 for the website in Exhibit 54?

14 A Now or then?

15 Q Personal knowledge.

16 A No, but when, time period?

17 Q Before.

18 A No.

19 Q Now?

20 A Given what she said that she wrote it,
21 then yes.

22 Q Okay. Do you have any personal knowledge
23 about whether or not Katie Case wrote five or six
24 tweets that appeared on Exhibit 56, the X account?

25 A No.

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1 Q Okay. So you're saying you didn't ask
2 her to do it, but you don't know whether or not she
3 actually did it?

4 A I mean, she testified that she did it,
5 correct?

6 Q Yes.

7 A So based on that and the conversations
8 that I'm not allowed to -- then, yes. But before
9 that, no, I did not. No.

10 Q Okay. And you are also aware that
11 Jed Wallace had involvement in building or creating
12 or publishing the website in Exhibit 54, right?

13 MR. GLOVER: Objection. Form.

14 MR. FREEDMAN: Objection.

15 THE WITNESS: No.

16 BY MS. SHAH:

17 Q If Katie Case testified that he did, is
18 it your testimony that she would be giving false
19 under-oath testimony?

20 A I can only talk to myself as to what I
21 know about my own personal test -- you know, I can't
22 speak to anyone else. But I have no knowledge of
23 that.

24 Q Okay. And you just don't know one way or
25 another if Jed Wallace had involvement in the

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1 website in Exhibit 54?

2 MR. FREEDMAN: Objection.

3 MR. GLOVER: Objection.

4 THE WITNESS: Correct. I don't know.

5 BY MS. SHAH:

6 Q And if Katie Case said she spoke to him
7 about it, you don't have any basis to deny that?

8 MR. GLOVER: Objection. Form.

9 MR. FREEDMAN: Objection.

10 THE WITNESS: If I was not on any
11 telephone calls between those two, if it did or did
12 not happen, I was not on them.

13 BY MS. SHAH:

14 Q Okay.

15 You're aware that part of what
16 Jed Wallace does for clients is to build websites,
17 right?

18 MR. GLOVER: Objection. Form.

19 MR. FREEDMAN: Objection.

20 THE WITNESS: That is not to my
21 knowledge, he builds websites.

22 BY MS. SHAH:

23 Q Say it in the language that you would
24 prefer.

25 MR. FREEDMAN: Objection.

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1 connection with building websites?

2 A Yes.

3 MR. FREEDMAN: Objection.

4 BY MS. SHAH:

5 Q Okay.

6 Do you have any knowledge as to who was
7 involved in any respect in the website about
8 Stephanie Jones in Exhibit 54?

9 MR. FREEDMAN: Objection.

10 THE WITNESS: I do now.

11 BY MS. SHAH:

12 Q What is that knowledge?

13 A From Katie's testimony that she wrote it.

14 Q Anything else?

15 A No, I do not build websites. So no.

16 Q Have you ever been involved in a matter
17 where a website was built?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: Just now, yes. And my own.

20 BY MS. SHAH:

21 Q What is your own?

22 A The one that you have, The Agency Group.

23 Q Okay. And when you say "just now," you
24 mean the website that was built in connection with
25 the -- the Lively litigations?

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1 A Correct.

2 Q Okay. What about for [REDACTED]?

3 A No, I have not built any websites.

4 Q I'm not asking if you built websites --

5 A Uh-huh.

6 Q -- I'm asking if you've been involved in
7 a matter where a website was built?

8 A No.

9 Q Including [REDACTED]?

10 MR. FREEDMAN: Objection.

11 THE WITNESS: I have not been involved in
12 that.

13 BY MS. SHAH:

14 Q Are you saying you were not involved in
15 building the website, or are you saying that a
16 website was not built in connection with the [REDACTED]
17 [REDACTED] matter?

18 A Could you rephrase the question --

19 Q Sure.

20 A -- so I know exactly what I'm answering?

21 Q I don't want to get caught up in -- in
22 the meaning of the word -- word "built" a website,
23 so I'm trying to broaden the question in terms of
24 your involvement in any capacity.

25 A Uh-huh.

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1 Q Your involvement in any capacity in a
2 matter where a website was built?

3 A In any matter at all?

4 Q Yes.

5 A I already testified yes to that.

6 Q Which ones?

7 A The one in connection with the Lively.

8 Q Uh-huh.

9 A My own.

10 Q Uh-huh.

11 A And there could have been one previously
12 for clients that back, back, back, I -- please show
13 me, I -- maybe. But that's what I've been involved
14 in.

15 Q Okay. Do you know whether [REDACTED]
16 requested that Katie Case write copy for the website
17 in Exhibit 54?

18 A I have never met [REDACTED]. I have
19 never had any communication with him, so no, I don't
20 know.

21 Q Apart from meeting [REDACTED] or having
22 communication with [REDACTED] are you aware of whether or
23 not [REDACTED] requested this website?

24 A No.

25 MR. FREEDMAN: Objection.

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: No. I was also working on
3 two other matters for Bryan at 9:40 a.m. that same
4 day.

5 BY MS. SHAH:

6 Q Was Jed involved in any of the other two
7 matters you were working on for Bryan at that time?

8 A I can't recall.

9 Q Okay. Do you believe that they were
10 asking you for copy on another matter?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: I could have background
13 report something. Could be.

14 BY MS. SHAH:

15 Q Does copy typically mean background
16 report?

17 A Yes, it can.

18 Q Really?

19 A Yes, it can.

20 Q Okay.

21 So if Katie Case testified that this was
22 another website that she created at your request --

23 A Uh-huh.

24 Q -- in conjunction with Bryan Freedman and
25 Jed Wallace, that would be false under-oath

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1 testimony?

2 MR. GLOVER: Objection. Form.

3 THE WITNESS: Yes.

4 BY MS. SHAH:

5 Q Okay.

6 Do you know who the [REDACTED]

7 are?

8 A Yes.

9 Q Who are they?

10 A They're [REDACTED]

11 [REDACTED]

12 Q [REDACTED]; is that
13 right?

14 A Yes.

15 Q Were they ever your clients?

16 A They -- at the beginning of the crisis --
17 their crisis situation, they reached out to hire us.
18 We had one conversation with them, and said okay,
19 before we knew more. And I have to -- I'm not sure
20 of the time period. When we found out, I would say
21 a couple of days, a day, two days, we declined to
22 work with them.

23 Q Okay. So you ultimately declined to
24 bring them on as clients of TAG; is that right?

25 A Correct.

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1 Q Okay. But notwithstanding that they were
2 never clients of TAG, you did work with Katie Case
3 to create a website in connection with their
4 litigation, didn't you?

5 A I did not.

6 MR. FREEDMAN: Objection.

7 BY MS. SHAH:

8 Q And if Katie Case testified that you did,
9 that would be false under-oath testimony; is that
10 your testimony?

11 A Completely false.

12 Q Okay. Is Katie Case a huge liar?

13 A Apparently so, yes.

14 Q Okay. What reason does she have to lie
15 about you?

16 MR. FREEDMAN: Objection.

17 THE WITNESS: I don't know how she is
18 lying about me, apart from her being scared of
19 Stephanie Jones. I don't know any other lies so far
20 unless you tell me them.

21 BY MS. SHAH:

22 Q Okay. How long have you known
23 Katie Case?

24 A Roughly, nine years -- I don't know.
25 Something like that.

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1 business while at TAG building websites with
2 Jed Wallace and Bryan Freedman?

3 MR. GLOVER: Objection. Form.

4 MR. FREEDMAN: Objection.

5 THE WITNESS: No, I don't -- no. I mean,
6 to my knowledge, I do not know, no.

7 MS. SHAH: Okay. I'm going to show
8 you -- you testified earlier that you were brought
9 in at some point to work with [REDACTED] and
10 [REDACTED] on a litigation involving [REDACTED],
11 right?

12 A Yes.

13 Q Okay. And Jed was involved in working
14 with them on that litigation as well, right?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: I can't remember. I
17 only -- you only reminded me from my own text
18 messages.

19 MS. SHAH: Okay. Let's mark this as...

20 THE STENOGRAPHIC REPORTER: 73.

21 (Exhibit 73 marked for identification.)

22 BY MS. SHAH:

23 Q Exhibit 73. It's an article dated
24 June 2nd, 2021, entitled "[REDACTED] Hit by
25 \$50 million Lawsuit by Former Goldman Sachs