

November 20, 2025

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,
Plaintiff,

v. Case No.
1:24-cv-10049-LJL

WAYFARER STUDIOS LLC, a
Delaware Limited Liability
Company, et al.
Defendants.

* * * * *

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VIDEOTAPED DEPOSITION OF:
ARON CULOTTA

Thursday, November 20, 2025
10:01 a.m. (CST)
New Orleans, Louisiana

Reported by: YOLANDA J. PENA, CCR, RPR
No. 2017002 in and for the
State of Louisiana

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1 Q. Let's say 50 percent.

2 A. 50 percent. Again, it depends, but I would
3 say in the literature and for -- for annotations of
4 this type, 50 percent would often be called something
5 like moderate agreement.

6 Q. Look at paragraph 54 of your report. The
7 first sentence ends, it says -- well, I'll read the
8 first sentence. "My analysis indicates that
9 Top-Comments for videos in August that were aligned
10 with the 'key messaging points' of the campaign (i.e.,
11 they elevate negative content about Ms. Lively or
12 positive content about Mr. Baldoni) consistently
13 generated a higher Top-Comment Share than expected."

14 Do you see that?

15 A. Yes, sir.

16 Q. Expected by who? What -- what are you
17 referring to in there?

18 A. So this would be a -- more of a statistical
19 argument about the average or -- the average type --
20 excuse me, the average top-comment share that one sees
21 in this specific dataset.

22 Q. So when you say higher than expected, does
23 that just mean higher than average?

24 A. Not simply higher than average, but we perform
25 statistical tests to determine whether that is a

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1 statistically significant deviation.

2 Q. Okay. So when you say higher than expected,
3 are you saying significantly -- significant deviation?

4 A. Yes. We are -- we are indicating significant
5 deviation from the mean for these.

6 Q. Okay. Significant deviation from the average
7 of the top-comment share, correct?

8 A. Correct.

9 Q. That's what you're referring to?

10 A. Yes, sir.

11 Q. In your analysis of the comments, did you
12 consider that at the time period you're looking at
13 Blake Lively was promoting an alcohol brand at the same
14 time as the premiere of a movie about domestic
15 violence? Did that play into your analysis at all?

16 MS. BENDER: Objection.

17 A. I wouldn't say I treated that differently from
18 other events in the data.

19 BY MR. KALTGRAD:

20 Q. Did you consider it at all?

21 MS. BENDER: Objection.

22 A. Only to the extent that it appeared in the
23 data I was examining.

24 BY MR. KALTGRAD:

25 Q. And how did you address it? How did that

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1 MR. KALTGRAD: Dr. Culotta, I'm now
2 looking at --

3 THE VIDEOGRAPHER: We are going back on
4 the record.

5 MR. KALTGRAD: Oh, I'm sorry.

6 THE VIDEOGRAPHER: The time is 11:21.
7 You're all good.

8 BY MR. KALTGRAD:

9 Q. Dr. Culotta, I'm now looking at paragraph 54
10 of your report. If you could, turn there. And towards
11 the bottom of paragraph 54, it says, "Both the
12 anti-Lively and pro-Baldoni average comment shares are
13 a statistically significant deviation from the mean,
14 suggesting there was a concerted effort to seed and/or
15 elevate these comments."

16 On what basis do you draw the conclusion that
17 a deviation from the mean means a concerted effort to
18 seed and/or elevate the comments?

19 A. So I guess there would be two -- two primary
20 issues here. One, the -- such a large deviation from
21 the mean is an indicator of anomalous behavior, right,
22 something that is not typical of a TikTok user.

23 But the second reason has to do with this top
24 comment idea in the first place via the interface,
25 right. So on TikTok, of course, it's very video-based,

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1 and typically, one is scrolling through videos. So the
2 user effort required to first open up the comment
3 section, scroll to a comment, and upvote it is just,
4 from a user perspective, a very kind of unusual thing
5 to do at that level of frequency.

6 So both the anomalous statistics that I talk
7 about as well as kind of the anomalous engagement with
8 the platform itself, both serve as indicators that this
9 was done through a concerted effort.

10 Q. How much of a standard deviation would have to
11 occur to reach the conclusion that there was concerted
12 effort?

13 A. Again, there's no strict threshold here. I
14 did a statistical test to determine the significance
15 level of that deviation, and that's in footnote 145.
16 And all of those are your confident very small p
17 values, which serves to indicate that they were extreme
18 outliers.

19 Q. And when you say "deviation from the mean,"
20 you're referring to the mean top comment share for
21 August for the four different categories that you've
22 listed there, right?

23 A. It's the mean over all -- over all top
24 comments in August.

25 Q. And that's reflected in Figure 1?

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1 A. Yes, sir. That's the 9.2 percent in Figure 1.

2 Q. How did you calculate the top comment share
3 mean?

4 A. So for every top comment in August, each one
5 has a top-comment share value, and I simply averaged
6 those over all of the top comments collected for
7 August.

8 Q. Is it your opinion that unless there is a --
9 strike that.

10 Are you offering the opinion that if there is
11 a standard deviation from the mean for either
12 anti-Lively, pro-Baldoni, pro-Lively, or
13 unsure/unrelated categories, that would equate to a
14 concerted effort to seed or elevate the comments?

15 MS. BENDER: Objection.

16 A. I'm not offering that one standard deviation
17 is -- is a threshold, necessarily.

18 THE REPORTER: I'm sorry. Can you
19 repeat that?

20 A. I'm not offering that one standard deviation
21 is a threshold. What I am saying is that this
22 significant deviation from the mean combined with the
23 modality of the app itself contextually serve as -- as
24 strong evidence of a concerted effort here.

25 BY MR. KALTGRAD:

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1 upvotes that comments received minus the number of
2 downvotes that comments received.

3 Q. And how is it calculated exactly? Do you
4 know?

5 A. So the exact algorithm is not publicly
6 published by Reddit. Part of the reason is they're
7 trying to prevent manipulation of that metric. But
8 what we do know is -- is, as I said, it's roughly that
9 difference between upvotes and downvotes.

10 Q. And you were offering the opinion that because
11 there was a high comment score on a specific Reddit
12 thread in August 14th, 2024, that's evidence of some
13 kind of manipulation; is that right?

14 MS. BENDER: Objection.

15 A. I would say the Reddit analysis is broader
16 than that specific thing, but yes, I would say the
17 extreme outlier activity we see on August 14th is a
18 strong indicator of potential inauthentic activity.

19 BY MR. KALTGRAD:

20 Q. Are you aware of any peer-reviewed study
21 showing that a comment score on Reddit is indicative of
22 social media manipulation?

23 A. Again, I think some of the literature we
24 discussed earlier that focuses on anomalous engagement
25 metrics would -- would support this type of analysis.

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1 BY MR. KALTGRAD:

2 Q. Okay. The third one isn't even close, right?

3 A. I guess I would say that 6500 is slightly more
4 than half of 12,000 and that 12,000 is less than half
5 of 27,000.

6 Q. I'm going to your report now. Paragraph 81,
7 you say, "The activity that I analyzed and observed
8 collectively demonstrates evidence of artificial or
9 manipulating activity."

10 And from what I can tell, the next several
11 pages describes comments that you coded as anti-Lively
12 or pro-Bal- -- pro-Baldoni that got lots of upvotes and
13 comments that you coded as pro-Lively that got lots of
14 downvotes.

15 Is that a fair summary?

16 MS. BENDER: Objection.

17 A. That's certainly part of -- of what I did
18 there, yeah.

19 BY MR. KALTGRAD:

20 Q. Okay. So these upvotes and downvotes, how
21 does that lead to evidence of artificial or
22 manipulating activity?

23 A. Sure. So I think particularly, if I look at,
24 for example, Figure 12, which is looking at every
25 comment in this four-month period -- and as a reminder,

1 this is over 450,000 comments from all of Fauxmoi, not
2 just those related to Ms. Lively or related folks.

3 So what I'm showing here is the distribution
4 of comment scores for all comments in this four-month
5 period, so it's a very large dataset. And these red
6 triangles are indicating comments that are related to
7 either Ms. Lively or Mr. Baldoni.

8 And what this graph is showing is that if you
9 look at these extreme -- these very extreme comments,
10 including the highest-scoring one, which is that red
11 triangle at the very top left, as well as the red
12 triangles all the way at the other side of the graph,
13 what this is showing is that not only are these
14 comments extreme outliers in terms of this Reddit
15 score, but also that the sentiment attached to these
16 are also aligned with the goals of the alleged
17 campaign.

18 In other words, everything -- I'm sorry.
19 Everything with the high positive score, the vast
20 majority of those are either anti-Lively or
21 pro-Baldoni, whereas on the other side of the graph,
22 the vast majority are either pro-Lively or
23 anti-Baldoni.

24 Q. So you've got scores that are high that you've
25 coded as anti-Lively. How do you make the leap to

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1 coordinated activity from that?

2 A. So it's a little bit like these -- the same
3 rationale in the TikTok analysis, right. So I have --
4 again, I want to emphasize -- extreme outliers here in
5 these red scores that would be very difficult to obtain
6 without any coordination combined with the sentiment
7 consistency around what is -- has a high versus low
8 score.

9 Q. Why do you say it would be very difficult to
10 obtain without coordination? What's that based on?

11 A. Several things. I mean, in part having worked
12 for a long time with this type of data, but also, the
13 fact that when we look at the actual comments and posts
14 themselves, I do see, of course, a distribution of
15 sentiment, pro-/anti-Lively, that one would expect.

16 So the fact that -- the comments themselves
17 seem to have that heterogeneity, yet the concentration
18 on the extreme tails of this graph are instead very
19 homogenous in their sentiment direction.

20 Q. Did you analyze the timing of upvotes or
21 downvotes in any way?

22 A. I didn't look at the time of specific upvotes,
23 but I do have the time stamp of when that
24 upvote/downvote or Reddit score was captured.

25 Q. You next look at the "little bump" YouTube

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1 secondly, to look at the presence of particular terms,
2 such as the term "bully," that appeared in those
3 comments.

4 Q. What expertise do you have that a layperson
5 would not have to look at comments and the timing?

6 A. Well, for sure, there's a lot that goes into
7 collecting, cleaning, and analyzing the data in order
8 to answer those types of questions, as well as the text
9 analysis to pull out particular words of interest in
10 the -- in the data.

11 Q. And what particular words did you pull out?

12 A. So in this case, we were looking at the word
13 "bully" and a couple variants of it.

14 Q. Are you aware of any peer-reviewed study that
15 says that pulling out terms and comments, looking at
16 the timing is indicative of online manipulation?

17 MS. BENDER: Objection.

18 A. So yes, I would say -- I would say that the
19 literature we cite in this report, some of which we've
20 discussed, looks at anomalous engagement and language
21 behaviors as signals of inauthenticity. I would say
22 that this analysis falls into that camp.

23 BY MR. KALTGRAD:

24 Q. Okay. So you've seen -- what did your
25 analysis -- you know, what did your analysis reveal

1 about the term "bully"?

2 A. My analysis shows -- and this would be on --
3 let me get the figure here. This will be Figure 17,
4 which is looking at the -- the fraction of comments on
5 this video on YouTube that contain the word "bully" for
6 each hour of this time range of interest, and what it's
7 showing is that -- several things.

8 First of all, prior to this video being linked
9 on Reddit and prior to it -- prior to the timing of
10 the -- the TAG suggestion that we just discussed,
11 number one, there was almost no engagement on this
12 video in terms of the number of comments for over four
13 days. And number two, the volume of comments using the
14 word "bully" increased sharply after that suggestion to
15 send the -- the video to Mr. Wallace.

16 Q. Are you offering the opinion that any
17 defendant added content -- added a comment with the
18 word "bully"?

19 A. Again, I'm not analyzing any one specific
20 comment. I'm saying this pattern that I'm observing in
21 this figure is consistent with a connection between the
22 work of -- of the defendants and the observed language
23 I see here.

24 Q. Well, you say -- you pulled out a lot of
25 comments with the word "bully." My question is, are

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REPORTER'S PAGE

I, YOLANDA J. PENA, Certified Court Reporter in and for the State of Louisiana, (CCR #2017002), Registered Professional Reporter (RPR #970346), the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434(B) of the Louisiana Code of Civil Procedure, do hereby state on the record:

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That any spelling of words and/or names which could not be verified through reference material have been denoted with the parenthetical "(phonetic)";

That the parenthetical "(sic)" is used to denote when a witness stated a word or phrase that appears odd or erroneous to show that it was quoted exactly as it stands.

YOLANDA PENA, CCR, RPR