

**September 9, 2025**



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2 grammatic, you know, any words misspelled  
3 or, you know, flipping paragraphs or adding  
4 a line or something like that.

5 Q. Apart from an editorial  
6 function like you just described, do you  
7 recall having substantive contributions to  
8 this?

9 A. I don't recall.

10 Q. Okay. Did you have an  
11 understanding at the time of what Wayfarer  
12 or Justin Baldoni was hiring TAG to do?

13 A. Yes.

14 MR. SCHUSTER: Objection.

15 Q. And what was that  
16 understanding?

17 A. To help with optics of the  
18 upcoming premiere, because at that point it  
19 was our understanding that Blake was saying  
20 she didn't want to go. So we were brought  
21 on to be like -- to help with, okay, what  
22 are the different scenarios if she doesn't  
23 show up, if he doesn't show up, if they  
24 both show up. It was really about the  
25 upcoming premiere.

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2 A. Exactly. We don't give false,  
3 yeah.

4 Q. So if you wanted a story to be  
5 published that had a negative slant with  
6 respect to some topic you would have to  
7 make sure that the information that you  
8 were putting out was somehow not made up?

9 MR. SCHUSTER: Objection.

10 A. Correct.

11 Q. Do you ever place stories?

12 A. Yes.

13 (Koslow Exhibit 31 marked for  
14 identification.)

15 Q. That is Exhibit 31, for the  
16 record. I believe it has been marked as  
17 31. Do you recognize this document?

18 A. Yes, I do.

19 Q. What is it?

20 A. It is a story written by  
21 Alison, I can't pronounce her, Boshoff --  
22 Boshoff -- at the Daily Mail.

23 Q. I was going to ask you how to  
24 pronounce it, but we can just go our own  
25 ways on that.

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2 Does this appear to be a true  
3 and accurate copy of the story that was  
4 published by Ms. Boshoff at the Daily Mail  
5 on August 20th?

6 A. I believe so.

7 Q. Did you place this story?

8 A. Yes.

9 Q. What did that involve?

10 A. That involved, again, this was  
11 following the Hollywood Reporter piece, so  
12 I couldn't care less about Blake or Justin,  
13 that was a direct hit on TAG that we at the  
14 time felt was placed by Leslie. It was  
15 placed by somebody that wasn't us, who was  
16 connected to this, and the whole sentiment  
17 behind the Hollywood Reporter piece was the  
18 whole, you know, oh, bot use, or I don't  
19 remember the details of it. But it was  
20 alluding to us being shady or nefarious or  
21 something.

22 So at that point it was like  
23 okay, well, then go take a look at her PR,  
24 because social media, organically, people  
25 are making -- like real people are making

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2 TikToks because they are, you know, upset  
3 or they don't like the material that she's  
4 been promoting or how she is weaving in a  
5 booze line into a film about domestic  
6 violence.

7 So I pointed Alison to stories  
8 that were already written. I never once  
9 said anything negative about Blake, false  
10 about Blake. I literally pointed her to on  
11 the record stories that were already  
12 written.

13 Again, this is more of like a  
14 PR versus PR battle, because we thought  
15 that Leslie was trying to, you know,  
16 present us in a way that we were not.

17 Q. Your reasons for placing this  
18 story had nothing to do with Mr. Baldoni?

19 A. No. At that point I was  
20 defending us. I was defending TAG and I  
21 was really upset and pissed off that  
22 somebody tried to make a story about us and  
23 make us seem like nefarious, you know, evil  
24 geniuses or something.

25 Q. So the genesis -- your

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2 on the record. The time is 5:44 p.m.

3 BY MR. NATHAN:

4 Q. Ms. Koslow, or Ms. Butler, I'm  
5 sorry.

6 A. That's fine.

7 Q. Are you paying your own legal  
8 fees in this case?

9 A. No.

10 Q. Do you know who is?

11 A. Not exactly, no.

12 Q. Not exactly or no?

13 A. Someone on the Wayfarer side.

14 Q. What's your best understanding  
15 of who that is?

16 MR. SCHUSTER: Objection.

17 A. I'm not sure exactly, but I  
18 know that it is through the Wayfarer side.

19 Q. By "the Wayfarer side," do you  
20 mean Wayfarer Studios or do you mean a  
21 person affiliated with Wayfarer?

22 A. I'm not sure exactly.

23 Q. Did you sign an, excuse me, did  
24 you sign an indemnification agreement in  
25 connection with this case?

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CERTIFICATION

I, TODD DeSIMONE, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose testimony as herein set forth, was duly sworn by me; and that the within transcript is a true record of the testimony given by said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 10th day of September, 2025.



TODD DESIMONE