

September 19, 2025

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Danny Greenberg
Conducted on September 19, 2025

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1	A. No.	09:56:02
2	Q. All right. I'm gonna give you some ground	09:56:03
3	rules, but let me ask you a preliminary question.	09:56:06
4	Have you -- you do know Blake Lively; is that	09:56:10
5	correct?	09:56:16
6	A. Do I know of Blake Lively, or do I --	09:56:16
7	Q. Yeah. What --	09:56:18
8	A. Yes.	09:56:18
9	Q. Either way.	09:56:19
10	A. Yes.	09:56:19
11	Q. You know of Ms. Lively. Have you ever met	09:56:20
12	Ms. Lively?	09:56:22
13	A. Yes.	09:56:23
14	Q. How many times?	09:56:23
15	A. Twice.	09:56:24
16	Q. And Ms. Lively is a client of your agency;	09:56:25
17	is that correct?	09:56:28
18	A. Yes.	09:56:28
19	Q. Have you personally been involved in	09:56:29
20	Ms. Lively's representation?	09:56:32
21	A. No.	09:56:33
22	Q. Why don't we actually begin at the	09:56:34
23	beginning. What is your occupation?	09:56:41
24	A. I'm a talent agent.	09:56:43
25	Q. And who are you affiliated with?	09:56:46

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1	you been a talent agent?	10:01:18
2	A. Yes.	10:01:20
3	Q. Now, you're familiar with the parties to	10:01:21
4	this case having read the complaint. In other words,	10:01:27
5	who the plaintiff is and who the defendants are?	10:01:29
6	A. Yes.	10:01:32
7	Q. And is it correct that at some point in	10:01:33
8	time, you represented Mr. Baldoni, a defendant in	10:01:37
9	this case?	10:01:43
10	A. Yes.	10:01:43
11	Q. How long did you represent Mr. Baldoni in	10:01:43
12	your capacity as a talent agent?	10:01:47
13	A. Around five years. I started representing	10:01:49
14	him after he directed his first movie, roughly the	10:01:53
15	second half of 2019.	10:01:58
16	Q. And are you familiar with an entity called	10:02:01
17	Wayfarer?	10:02:05
18	A. Yes.	10:02:05
19	Q. And Wayfarer Studios, is that or has that	10:02:06
20	been a client of William Morris's, if you know?	10:02:11
21	A. Yes.	10:02:14
22	Q. And would u u be the talent agent who	10:02:15
23	would've primarily responsible for the representation	10:02:22
24	of Wayfarer?	10:02:23
25	A. There was a team that represented	10:02:23

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1 Wayfarer. The primary representation of Wayfarer was 10:02:25
2 through William Morris Endeavor's independent 10:02:31
3 division. I was involved in that representation, but 10:02:31
4 my primary responsibility was representing Justin 10:02:35
5 as -- as a director and an actor. 10:02:38
6 Q. And again, approximately how many years or 10:02:45
7 how long did you represent Mr. Baldoni in your 10:02:51
8 capacity as an agent for William Morris? 10:02:56
9 A. Five years. 10:02:59
10 Q. Do you still represent Mr. Baldoni? 10:03:00
11 A. No. 10:03:03
12 Q. Why not? 10:03:04
13 A. We released Mr. Baldoni -- or Justin and 10:03:09
14 Wayfarer right around December 22nd of '24. 10:03:13
15 Q. Okay. Let me start with who is "we"? 10:03:18
16 A. The agency. 10:03:21
17 Q. And was there some event that prompted 10:03:25
18 Mr. Baldoni's dismissal as a client of William 10:03:31
19 Morris? 10:03:33
20 MS. GOVERNSKI: Objection. Form. 10:03:41
21 THE WITNESS: Can you repeat the question? 10:03:43
22 Q. BY MS. GAROFALO: I will. I'll rephrase 10:03:45
23 it. Did something happen that caused William Morris 10:03:46
24 to drop Mr. Baldoni as a client? 10:03:49
25 A. Yes. 10:03:51

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1	you referring to?	10:21:26
2	Q. BY MS. GAROFALO: On the set, making	10:21:27
3	comments, offering his opinions, anything at all.	10:21:29
4	A. Yes.	10:21:32
5	Q. Okay. And tell me what Mr. Reynolds'	10:21:32
6	involvement was, if you can?	10:21:36
7	MS. LEADER: Object to the form.	10:21:42
8	MS. GOVERNSKI: Join.	10:21:43
9	THE WITNESS: At that point, my	10:21:44
10	understanding was really just support and -- and	10:21:47
11	perhaps some creative feedback that he may have	10:21:48
12	worked through Blake to the -- you know, to Justin	10:21:54
13	and the team. Outside of that, I am not aware of any	10:21:55
14	other creative contribution he was making.	10:21:58
15	Q. BY MS. GAROFALO: Okay. So you told me	10:22:00
16	that there were basically two subjects covered in the	10:22:01
17	call with Mr. Reynolds. The first were certain	10:22:07
18	aspects of Justin's behavior. Tell me what	10:22:10
19	Mr. Reynolds said?	10:22:14
20	MS. GOVERNSKI: Objection to form.	10:22:16
21	THE WITNESS: He brought up incidents that	10:22:19
22	happened between Justin and Blake. We discussed a	10:22:23
23	few of those. And then we translated and moved on to	10:22:26
24	talking a bit about the movie.	10:22:31
25	Q. BY MS. GAROFALO: Okay. What instances did	10:22:34

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1	Mr. Reynolds describe to you during the phone call	10:22:39
2	prior to the premiere?	10:22:44
3	A. He brought up an incident of Justin and --	10:22:45
4	and the production playing a birthing video. He	10:22:53
5	brought up an instance of Justin inquiring about	10:22:57
6	Blake's weight through a third party. He -- he also	10:23:02
7	brought up Justin's behavior with respect to doing	10:23:10
8	the electronic press kit. Also Justin's behavior	10:23:15
9	having to do with the -- I believe there was a coffee	10:23:20
10	table book in -- in discussion that came up.	10:23:23
11	Mentioned something about the production hiring a	10:23:27
12	doctor on the film that was a friend of his. Then	10:23:33
13	had a discussion about Ryan's opinion of the cut that	10:23:41
14	he had seen. We had a discussion about that as well.	10:23:48
15	Q. Anything else that Mr. Reynolds raised with	10:23:55
16	you with respect to instances of Justin's behavior on	10:23:59
17	the call two or three weeks prior to the premiere?	10:24:02
18	A. Not that I recall beyond what I've said.	10:24:07
19	Q. Did Mr. Reynolds have any -- an attitude?	10:24:19
20	Was he angry, happy about the film? Was there any	10:24:22
21	indication of Mr. Reynolds' state of mind?	10:24:26
22	MS. LEADER: Objection to the form --	10:24:31
23	MS. GOVERNSKI: Objection. Form.	10:24:35
24	THE WITNESS: He was, I think -- he was a	10:24:36
25	bit angry. He seemed a bit defensive. He seemed	10:24:38

1 A. Visiting a client which is what I do when
2 my clients are directing films.

3 Q. By the way, where was the film shot? Let's
4 stick with the first phase of filming, if you know.

5 A. In New Jersey. I believe.

6 MS. GAROFALO: Okay. Very briefly, let's
7 mark as Exhibit 3 another one of your chats. This
8 one's Bates stamped WME 510 through 511. Also dated
9 November 14th, 2023.

10 (Exhibit 3 for identification.)

11 Q. BY MS. GAROFALO: Okay. And in this one,
12 the second dark blue box about two thirds of the way
13 down, it's a message from you to Mr. Baldoni -- to
14 Mr. Heath, rather; is that correct?

15 A. So let's see here.

16 Q. I guess my question is --

17 A. So what's your question?

18 Q. -- is that one directed to Mr. Heath or
19 Mr. Baldoni?

20 A. It looks like this was a conversation
21 between Justin and me.

22 Q. Okay. And you say to Mr. Baldoni, "Yup,
23 and I'm there to have your back and remind you, not
24 that you need me to, that you are the man, and you
25 are going to crush this."

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1	(Exhibit 13 for identification.)	01:46:09
2	Q. BY MS. GAROFALO: Exhibit 13 is another	01:46:09
3	chat, this time with Mr. Heath. It is dated	01:46:12
4	Wednesday, July 3rd, 2024. And Mr. Baldoni is	01:46:16
5	included. And in the first chat, he says, "Please	01:46:27
6	tell Josh that I'm willing to waive my, quote, A Film	01:46:29
7	By credit, close quote. I want peace and for this to	01:46:34
8	end."	01:46:39
9	Did you have any understanding of what	01:46:40
10	Mr. Baldoni was saying in Exhibit 13?	01:46:42
11	A. Yes.	01:46:45
12	Q. What was he saying, to your understanding?	01:46:46
13	A. Jamey reached out to me to let me know that	01:46:50
14	Blake made a request that Justin take off his "Film	01:46:54
15	By" credit and -- which opened up another	01:46:57
16	conversation that we had to have strategically. And	01:47:02
17	ultimately, Justin made the decision to waive his	01:47:05
18	"Film By" credit for her.	01:47:09
19	Q. Was Ms. Lively, at this point in time,	01:47:12
20	still threatening not to participate in publicity	01:47:14
21	this time if Mr. Baldoni didn't agree to waive his	01:47:21
22	"Film By" credit?	01:47:24
23	MS. LEADER: Object to the form --	01:47:26
24	MS. GOVERNSKI: Objection. Form.	01:47:28
25	THE WITNESS: I'm not aware of that.	01:47:29

1 They are your partners. It was theirs too. Paren,
2 i.e., you want to mention this a.m. event, their
3 acknowledgement of the continued extortion and effort
4 to gain control of the film.

5 At the time you sent these suggestions for
6 letter to Sony, you sent to to Mr. Baldoni, had you
7 had discussions with anyone at Sony about
8 Ms. Lively's effective attempts at extortion?

9 MS. LEADER: Object to the form.

10 THE WITNESS: I had on going conversations
11 with Ange Giannetti, the executive on the project,
12 about the behavior that Blake was displaying along
13 the way. And at this point in time, what was on the
14 table was the premiere issue.

15 Q. BY MS. GAROFALO: You were choosing your
16 words very carefully, weren't you?

17 MS. GOVERNSKI: Objection to form.

18 MS. LEADER: Object to form.

19 THE WITNESS: I don't remember my state of
20 mind when I wrote this letter.

21 Q. BY MS. GAROFALO: Is it your practice to
22 choose why you are words carefully when conveying an
23 important message?

24 A. I do my best.

25 Q. And you used the word extortion in this

1 chat suggesting to Mr. Baldoni what he might write to
2 Sony, correct?

3 MS. LEADER: Objection to form.

4 THE WITNESS: Yes, it's in the text.

5 Q. BY MS. GAROFALO: That's a pretty strong
6 word, isn't it?

7 MS. GOVERNSKI: Objection to form.

8 MS. LEADER: Object to form.

9 THE WITNESS: It felt appropriate at the
10 moment.

11 Q. BY MS. GAROFALO: You anticipated my next
12 question. Thank you. Then you go on to say but
13 don't in any way put Sony on the defensive or indict
14 them. Then if you can be contrite in some capacity
15 very briefly, acknowledging the two of you had your
16 moments which she would dissect your energy, word
17 choice, and personality frequently that led to mutual
18 discomfort working with one another. Paren, not
19 everyone gets along kind of thing. Not all
20 personalities are compatible.

21 Now, when you were suggesting to
22 Mr. Baldoni that he write something to Sony saying,
23 you know, other people have agreements or down
24 playing the agreements, did you believe that
25 Mr. Baldoni was taking Ms. Lively's conduct too

1 seriously?

2 MS. GOVERNSKI: Object to form.

3 MS. LEADER: Object to form.

4 THE WITNESS: I'm not really following the
5 question.

6 Q. BY MS. GAROFALO: Okay. I'll withdraw it.
7 You used the word extortion, correct?

8 A. Yes.

9 Q. Sounds to me like you believed at the time
10 of this chat July 26, 2024, that it was more than
11 just ordinary incompatibility between Mr. Baldoni
12 and Ms. Lively. Is that a true statement?

13 MS. GOVERNSKI: Objection to form.

14 THE WITNESS: I think my use of the word
15 extortion there was referencing just cumulative
16 behavior that both the studio and Wayfarer and Justin
17 was having to manage. And so that's why I used the
18 word.

19 Q. BY MS. GAROFALO: That would be more than
20 just a disagreement between two different
21 personalities, wouldn't it, Mr. Greenberg?

22 A. Well, their personalities, you know, again,
23 I think the text speaks for itself. But I think they
24 were not getting along. And so I think it's
25 important -- I was suggesting to Justin that he be --

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1	A. Correct.	04:04:32
2	Q. So you don't have any personal knowledge	04:04:32
3	whatsoever?	04:04:34
4	A. No.	04:04:34
5	Q. When did filming wrap on It Ends with Us?	04:04:57
6	A. Can --	04:04:57
7	Q. This is actually a good time for a break	04:05:05
8	after you've answered this question, if you need one.	04:05:05
9	If not, we'll keep going.	04:05:09
10	A. You -- you may have a better sense of the	04:05:09
11	date than I do. Sometime in early '24. I don't know	04:05:10
12	the date.	04:05:13
13	Q. Do you want a break or do you want to keep	04:05:14
14	going?	04:05:17
15	A. We can take a break.	04:05:17
16	MS. GOVERNSKI: Okay. Great. Let's take a	04:05:25
17	20- minute break.	04:05:27
18	THE VIDEOGRAPHER: We are going off the	04:05:30
19	record. The time is 4:04.	04:05:31
20	(Recess taken.)	04:19:18
21	THE VIDEOGRAPHER: We are back on the	04:19:18
22	record. The time is 4:18 p.m.	04:19:19
23	Q. BY MS. GOVERNSKI: Mr. Greenberg, when I	04:19:25
24	refer to post-production, I'll be referring to the	04:19:28
25	time after early 2024 when filming wrapped, okay?	04:19:30

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1	you see that you received this? You're in the cc	04:38:54
2	line?	04:38:57
3	A. Yeah. I do.	04:38:57
4	Q. Okay. And you see the subject is "It Ends	04:38:57
5	With Us Proposed Sony Co-Production Term Sheet" --	04:38:59
6	A. Got it. Yup.	04:38:59
7	Q. Do you see that --	04:39:03
8	A. It looks -- yeah, it looks like a producer	04:39:04
9	arranged an agreement between Wayfarer and Sony.	04:39:05
10	Q. Okay. And the attachment to at least	04:39:08
11	Exhibit 22 is "Proposal to Sony For It Ends With Us."	04:39:10
12	Do you see that?	04:39:13
13	A. Yes.	04:39:13
14	Q. Okay. And the -- and the -- and you recall	04:39:14
15	receiving this document --	04:39:18
16	A. No, I don't recall seeing it because I	04:39:20
17	wasn't across this. My colleague, Deb McIntosh, was,	04:39:25
18	but I was copied.	04:39:29
19	Q. Okay. And the opening email of Exhibit 22	04:39:30
20	states, "Michael, on behalf of Wayfarer Studios,	04:39:33
21	attached please find a proposed term sheet for a	04:39:35
22	co-production for It Ends with Us."	04:39:38
23	Do you see that document --	04:39:39
24	A. Yes. Yes.	04:39:40
25	Q. Do you understand that Schuyler Moore, who	04:39:40

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1	it looks to be a lawyer, was sending this to Sony on	04:39:45
2	behalf of Wayfarer; is that right?	04:39:48
3	A. Looks that way, yeah.	04:39:50
4	Q. Okay. And if you could go to the next	04:39:51
5	page -- oh, by the way, does Sony also go by	04:39:53
6	"Columbia"?	04:39:57
7	A. Yes.	04:39:57
8	Q. Okay. So if we see "Columbia" in this, can	04:39:57
9	we understand that to be referring to Sony?	04:40:00
10	A. Yes.	04:40:02
11	Q. Okay. So if you can go to the page ending	04:40:02
12	in 345 of Exhibit 22 and Paragraph 6.	04:40:07
13	Do you see that?	04:40:13
14	A. Yes.	04:40:14
15	Q. Okay. And you see it says, "Director."	04:40:14
16	"Justin Baldoni to direct and to have final cut	04:40:17
17	rights. Picture to be edited at a location of his	04:40:20
18	choosing."	04:40:25
19	Do you see that?	04:40:25
20	A. Yes.	04:40:26
21	Q. What does "final cut rights" mean?	04:40:26
22	A. Meaning that his cut of the movie would be	04:40:30
23	the movie that would be released.	04:40:32
24	Q. So do you understand that Wayfarer, in	04:40:33
25	their proposal to Sony, was proposing that	04:40:37

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1	Mr. Baldoni would have final cut rights?	04:40:40
2	A. Yes.	04:40:42
3	Q. Okay. Let's go to Exhibit 23, please. And	04:40:44
4	I'm gonna ask you to turn to the exact same	04:40:46
5	paragraph, which is located on the page ending in	04:40:50
6	Bates No. 1997. Same paragraph. Paragraph 6. Let	04:40:54
7	me know when you're there.	04:40:59
8	A. I'm there.	04:41:02
9	Q. Okay. And do you notice any changes in	04:41:02
10	Paragraph 6?	04:41:08
11	A. Yes.	04:41:10
12	Q. Please explain.	04:41:11
13	A. It says here -- I'm assuming this is a	04:41:13
14	response from Sony, that Sony does not customarily	04:41:19
15	give directors a final cut, which is their response	04:41:22
16	to Wayfarer asking for it.	04:41:26
17	Q. So specifically in Paragraph 6, they put	04:41:28
18	what appears to be brackets around "to have final cut	04:41:30
19	rights"; is that right?	04:41:34
20	A. Yes.	04:41:35
21	Q. And then they write in the last sentence,	04:41:36
22	"Columbia customarily doesn't give directors final	04:41:38
23	cut."	04:41:43
24	Do you understand that?	04:41:43
25	A. Yes.	04:41:43

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1	Q. Okay. And then let's go to the third,	04:41:44
2	Exhibit 24. And we can start on the cover page,	04:41:50
3	which ends in 367. And you see this is an email	04:41:55
4	from, again, Mr. Moore saying, "Attached please find	04:42:01
5	a clean and redline proposal with our remaining minor	04:42:05
6	requested changes."	04:42:09
7	Do you see that?	04:42:10
8	A. Yes.	04:42:10
9	Q. Okay. And so let's go to the next page	04:42:10
10	again. Same drill. Document ends in 369,	04:42:12
11	Paragraph 6.	04:42:18
12	Do you see that paragraph?	04:42:18
13	A. Yes.	04:42:19
14	Q. And what do you notice about Paragraph 6 in	04:42:19
15	this version?	04:42:22
16	A. It now has become a -- basically a scenario	04:42:23
17	of -- of testing the film and it's ultimately -- how	04:42:50
18	that ultimately plays out will dictate which film	04:42:56
19	will be released.	04:42:59
20	Q. So Paragraph 6 removes the language that	04:43:00
21	Mr. Baldoni was to have final cut rights; is that	04:43:05
22	right?	04:43:07
23	A. Correct.	04:43:07
24	Q. And it says instead, "Final cut to be	04:43:08
25	determined by bake-off"?	04:43:10

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1	A. Yes.	04:43:14
2	Q. What is a bake-off?	04:43:15
3	A. A bake-off is when a filmmaker comes to an	04:43:16
4	agreement with a studio that if the movie tests at a	04:43:23
5	certain level, that the studio would release that	04:43:27
6	particular version of the movie. If it achieves	04:43:29
7	those numbers in a test screening scenario.	04:43:33
8	Q. And what happens if it doesn't achieve	04:43:36
9	those levels?	04:43:39
10	A. Then the studio would not contractually be	04:43:40
11	obligated to release that cut of the film.	04:43:43
12	Q. And what would be released instead?	04:43:45
13	A. They would probably come to some	04:43:48
14	arrangement on ultimately what the -- you know, which	04:43:49
15	cut should be released. And usually, at that point,	04:43:50
16	the studio and the filmmaker and the editor would	04:43:52
17	work on a cut that everyone feels good about.	04:43:54
18	Q. So a bake-off contemplates more than one	04:43:56
19	cut?	04:44:00
20	A. A bake-off contemplates -- really in	04:44:00
21	this -- well, let me took here 'cause I don't see it	04:44:04
22	referring to any other cut in here.	04:44:07
23	Q. Well, how would it be a bake-off if it's	04:44:12
24	only one cut?	04:44:15
25	A. You know, the word "bake-off" really	04:44:21

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1 doesn't have -- I'm not sure why it was used in this 04:44:22
2 scenario because it's pretty clear, and the studio 04:44:25
3 made it pretty clear, as did Wayfarer, that once it 04:44:29
4 hits the level in which it needed to hit, the studio 04:44:33
5 would release Justin's cut. So I'm not sure why the 04:44:38
6 word "bake-off" would be in this particular paragraph 04:44:40
7 'cause it doesn't reference anything other than 04:44:44
8 perhaps Sony's cut. In other words, if his cut 04:44:46
9 tested at a certain level and along the way of 04:44:50
10 post-production, Sony came up with another cut of the 04:44:52
11 movie as a backup in the event that Justin's cut 04:44:55
12 didn't reach the level in which it needed to reach, 04:44:58
13 they can then, theoretically, put this contract and 04:45:01
14 use the Sony cut. That would be my only 04:45:01
15 interpretation of why there would be a bake-off. 04:45:06
16 Q. And does this document contemplate any 04:45:07
17 specificity regarding what you've called Sony's cut? 04:45:11
18 A. Well, it says Columbia's changes. So 04:45:16
19 that -- that's the -- that would be the implication 04:45:18
20 in this -- if you were trying to find some version of 04:45:22
21 why the word "bake-off" is there. But my 04:45:23
22 interpretation in reading this, it's pretty clear 04:45:26
23 that it's simply a function of how Justin's cut would 04:45:29
24 test and whether or not Sony would have to engage or 04:45:32
25 not because the movie didn't test at a certain level. 04:45:35

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1	Q. You're not a lawyer, right?	04:45:38
2	A. No.	04:45:39
3	Q. So do you -- are you saying that they would	04:45:39
4	include the word "bake-off" even though they didn't	04:45:43
5	really mean bake-off?	04:45:45
6	A. No.	04:45:47
7	Q. Okay. And you see the last sentence refers	04:45:48
8	to a cut incorporating Columbia's changes, right?	04:45:54
9	A. Yup. Yes.	04:45:57
10	Q. And it doesn't say here who would be	04:45:57
11	responsible for creating a cut incorporating	04:45:59
12	Columbia's changes, does it?	04:46:02
13	A. No, it does not.	04:46:03
14	Q. Okay. So as of at least the date of this	04:46:04
15	document -- which, let's see when that is --	04:46:10
16	October 2022, Mr. Baldoni understood that he would	04:46:15
17	not have final cut rights; is that right?	04:46:19
18	MS. GAROFALO: Objection.	04:46:24
19	THE WITNESS: Correct.	04:46:26
20	Q. BY MS. GOVERNSKI: Okay. Let's go to an	04:46:29
21	exhibit that opposing counsel showed you, Exhibit	04:46:32
22	No. 8, which ends in WME 1214.	04:46:44
23	Before we talk about this document,	04:46:56
24	Mr. Greenberg, I just want to understand, are there	04:46:58
25	only -- were there only ever literally two versions	04:47:01

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1	of the film, like, Justin's edit and then another	04:47:06
2	version and that was it, only two?	04:47:10
3	A. No. I mean, it's -- there's Justin --	04:47:13
4	it's -- it's a living, breathing thing. And so	04:47:17
5	Justin's edit of the film was a movie that he	04:47:20
6	effectively finished but not literally finished, but	04:47:24
7	that he, for the most part, finished. I'm not sure	04:47:27
8	whether or not it was locked yet. But that was the	04:47:29
9	movie that was tested that I attended. And that was	04:47:31
10	when I think this particular formula that you read in	04:47:35
11	the last paragraph, in paragraph 6, applied to that	04:47:39
12	test.	04:47:44
13	Q. How do you know it applied to that test?	04:47:45
14	A. Because as far as I know, that was the last	04:47:47
15	test of any of his films -- or any of his cuts that	04:47:49
16	he was doing along the way.	04:47:52
17	Q. How many of Justin's cuts were tested?	04:47:53
18	A. I don't recall how many.	04:47:55
19	Q. More than one, though?	04:47:57
20	A. I know there was at least two tests, but it	04:47:58
21	was the cut that he was progressing on. So it's one	04:48:01
22	version of the movie. It might have been farther	04:48:03
23	along in the second test than it was in the first	04:48:06
24	test, but it was the movie that he was working on	04:48:08
25	post.	04:48:10

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1 A. He -- he also referenced -- there might 05:20:14
2 have been a couple other things, like referencing the 05:20:19
3 fact the production hired one of Justin's friends to 05:20:20
4 be a doctor on the movie. In addition to Justin 05:20:23
5 hiring his wife to be a doctor on a movie. There 05:20:26
6 was -- I -- I don't recall anything else off the top 05:20:28
7 of my head, but he felt, to me, in that -- in that -- 05:20:33
8 on that call that he was trying to build a case 05:20:36
9 against Justin. And I just didn't feel like anything 05:20:38
10 rose to that occasion. And so I was trying to get, 05:20:43
11 you know, Ryan to give me more, and that's when he 05:20:46
12 sort of put a stop to it, and the call pivoted to 05:20:48
13 more about the print and the test that had just 05:20:51
14 happened, and his reaction to what he had just seen 05:20:53
15 in this part of it. 05:20:56

16 Q. But you earlier testified that none of what 05:20:56
17 he conveyed was sexual in nature; is that right? 05:21:00

18 A. Correct. 05:21:06

19 Q. Okay. Do you recall Mr. Reynolds conveying 05:21:06
20 to you that Colleen Hoover did not want to go to the 05:21:10
21 premiere with Mr. Baldoni? 05:21:15

22 A. I do remember that. 05:21:17

23 Q. What did he tell you? 05:21:21

24 A. He asked me if Justin was planning on going 05:21:22
25 to the premiere, which surprised me. I said, Of 05:21:24

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1	course, he would. I think, at the time, I reiterated	05:21:27
2	to him that he found the material, developed the	05:21:30
3	material, produced the material, co-financed the	05:21:32
4	material, starred in the movie, directed the movie,	05:21:34
5	and it seemed peculiar that he would even raise that	05:21:35
6	issue. And his reaction to my reaction was that	05:21:37
7	Colleen would not go to the premiere if Justin was	05:21:40
8	there -- or that he believed it's possible that	05:21:43
9	Colleen would not go to the premiere if he was there.	05:21:46
10	Q. Did you speak to Ms. Hoover regarding	05:21:49
11	whether she would go to the premiere if Mr. Baldoni	05:21:51
12	was there?	05:21:53
13	A. No.	05:21:54
14	Q. Do you have any reason to doubt	05:21:54
15	Mr. Reynolds's statement that Ms. Hoover would not go	05:21:57
16	to the premiere if Mr. Baldoni was there?	05:22:01
17	A. I had no reason to doubt it.	05:22:03
18	Q. Do you recall Mr. Reynolds telling you that	05:22:05
19	Ms. Lively was actually trying to keep the cast	05:22:09
20	together at that point to all go to the premiere	05:22:13
21	together?	05:22:17
22	A. I don't recall that part of the	05:22:17
23	conversation.	05:22:20
24	MS. GOVERNSKI: Okay. We can mark	05:22:29
25	Exhibit 26, which will be WME_0000641.	05:22:33

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1	Q.	By refuting her claims about what happened	05:45:25
2		on the set?	05:45:28
3	A.	Potentially. Again, I wasn't across the --	05:45:28
4		the publicity campaign or -- or anything along those	05:45:33
5		lines. So that's -- this was basically a reflection	05:45:35
6		of what I heard from the publicists as well as from	05:45:38
7		Wayfarer.	05:45:42
8	Q.	But your understanding is that they were	05:45:42
9		preparing to go public to refute her claims about	05:45:44
10		what happened to her on the set?	05:45:47
11		MS. GAROFALO: Objection.	05:45:50
12		THE WITNESS: In the event they needed to	05:45:51
13		defend themselves, as my understanding is that they	05:45:53
14		were prepared to be truthful about what their	05:45:55
15		experience was.	05:45:58
16	Q.	BY MS. GOVERNSKI: Did you attend the	05:45:59
17		premiere of It Ends with Us?	05:46:01
18	A.	Yes.	05:46:02
19	Q.	Did you speak with Mr. Sarowitz at the	05:46:04
20		premiere?	05:46:10
21	A.	I spoke with Mr. Sarowitz at the premiere	05:46:11
22		party.	05:46:13
23	Q.	The premiere party after the premiere?	05:46:14
24	A.	Correct.	05:46:16
25	Q.	Where did that occur?	05:46:16

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1 A. At a hotel down the street. I forgot the 05:46:17
2 name of it. 05:46:20

3 Q. And that was on August 6, 2024? 05:46:20

4 A. That sounds right. 05:46:23

5 Q. What did you and Mr. Sarowitz discuss? 05:46:24

6 A. He asked me how things were going with 05:46:26
7 respect to publicity, with respect to the dynamic 05:46:34
8 between Blake and Justin. Is this gonna impact how 05:46:36
9 the movie opens? Is it -- my response to him was 05:46:39
10 simply, you know, The publicists are all over it. 05:46:42

11 They're doing their job. They're working in 05:46:45
12 conjunction with Blake's publicity team. And I -- it 05:46:47
13 seems to me like everything's going to be okay. At 05:46:49
14 that point, it was Thursday before the movie opened. 05:46:52
15 So there -- there really wasn't much out there, if 05:46:54
16 anything, about the dynamic between the two of them. 05:46:57
17 So I was basically trying to just sort of calm him 05:47:00
18 down. He was seemingly a bit defensive and nervous 05:47:03
19 about what could happen. Again, you know, he 05:47:09
20 financed and built the studio. And so I was just 05:47:13
21 basically alleviating his concerns, and he seemed to 05:47:17
22 be okay. 05:47:20

23 Q. You used the words, "calm him down." How 05:47:23
24 would you describe his demeanor? 05:47:25

25 A. I don't know him very well. I've only met 05:47:27

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1 him and had a couple of Zooms with him over time, 05:47:30
2 but, you know, he seems to me to be a relatively 05:47:33
3 intense guy, and a very straightforward, seemingly 05:47:35
4 very honest guy, at least how he has communicated 05:47:39
5 with me in the few times that we've communicated and 05:47:42
6 how that's very important to him. Kind of a 05:47:44
7 spiritual, faithful guy. And so in that moment, it 05:47:47
8 seemed to me that he was feeling like -- and I've 05:47:50
9 used the word earlier, a bit defensive in that he 05:47:52
10 needed to potentially protect himself, and so I was 05:47:55
11 trying to assure him that he really had nothing to 05:47:57
12 worry about and that everybody was doing their job, 05:47:59
13 and, you know, the movie's gonna open great and, you 05:48:02
14 know, it's gonna be all right. 05:48:04
15 Q. Do you remember anything in particular that 05:48:05
16 Mr. Sarowitz said, his exact words? 05:48:07
17 A. For instance? 05:48:10
18 Q. Well, did Mr. Sarowitz tell you that he was 05:48:14
19 prepared to spend a hundred million dollars to ruin 05:48:16
20 the lives of Ms. Lively? 05:48:18
21 A. No. He did not say that. 05:48:22
22 Q. Did he say anything similar to that? 05:48:22
23 A. He said that -- if I remember correctly, 05:48:26
24 when I used the word "publicist," his response to 05:48:28
25 that is, That's fine, but, you know, I have lawyers, 05:48:32

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1 and in the event I need to, and this becomes a legal 05:48:34
2 situation, I'm prepared to spare no expense. He 05:48:37
3 didn't mention anything about money. And again, it 05:48:39
4 just sort of seemed in character. But my analysis 05:48:43
5 was that it was purely defensive and that he had no 05:48:50
6 intention of doing anything. It sounded like it was 05:48:53
7 a little bit hubris and a little bit like, you know, 05:48:56
8 let me know if I need to do something, I will. Let 05:48:59
9 me know if I need to engage or whatever, and so that 05:49:02
10 was the last time I spoke to him. 05:49:04

11 Q. So it's your testimony that he did not 05:49:05
12 reference spending a hundred million dollars? 05:49:07

13 A. I don't -- I don't recall. It's possible. 05:49:10
14 I just don't recall him using that number or that 05:49:14
15 figure. I do recall something to the effect of 05:49:16
16 sparing no expense. So it's possible he did. I just 05:49:21
17 don't recall that. 05:49:25

18 Q. And is Mr. Sarowitz a billionaire? 05:49:27

19 A. I believe so. 05:49:30

20 MS. GAROFALO: Objection. 05:49:31

21 THE WITNESS: I believe so from what I've 05:49:32
22 read -- 05:49:34

23 Q. BY MS. GOVERNSKI: So what was your 05:49:34
24 impression of when he said he would spare no expense? 05:49:36

25 A. I didn't really have much of an impression. 05:49:40

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1	You know, I know that he has means and that he would	05:49:44
2	do what he needed to do in the event that he felt	05:49:48
3	threatened.	05:49:50
4	Q. And what was he prepared to do? Do you	05:49:52
5	recall any words that he used that -- of what he was	05:49:55
6	prepared to do?	05:49:58
7	A. No. There was no specificity. It was	05:49:59
8	broad.	05:50:02
9	Q. Did he say that he was prepared to ruin the	05:50:02
10	lives of Ms. Lively and her family in -- in any way?	05:50:06
11	A. No.	05:50:09
12	MS. GAROFALO: Objection.	05:50:10
13	Q. BY MS. GOVERNSKI: What did he say	05:50:12
14	regarding Ms. Lively and her family?	05:50:13
15	MS. GAROFALO: Objection.	05:50:17
16	THE WITNESS: He never mentioned her	05:50:18
17	family. It's possible that he mentioned Blake and	05:50:21
18	Ryan and -- and sort of, like, combined the two of	05:50:23
19	them in terms of, like, power things with Blake and	05:50:26
20	Ryan. But beyond that, there was no mention of his	05:50:29
21	family -- Their family. There was no mention of	05:50:33
22	ruining the lives from what I remember.	05:50:33
23	Q. BY MS. GOVERNSKI: What do you recall about	05:50:37
24	what he said about Ms. Lively?	05:50:39
25	A. He had nothing specific to say about Blake.	05:50:41

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1	little concerned about Steve S."	05:52:29
2	That's Mr. Sarowitz?	05:52:30
3	A. Correct.	05:52:31
4	Q. You said, "He was really aggressive when I	05:52:32
5	spoke to him."	05:52:35
6	Do you see that?	05:52:35
7	A. Yes.	05:52:39
8	Q. And what were you referencing when you	05:52:39
9	said, "when I spoke with him"?	05:52:41
10	A. The conversation that we just discussed at	05:52:42
11	the premiere party.	05:52:44
12	Q. And why did you describe him as really	05:52:45
13	aggressive?	05:52:47
14	A. I think that was just describing his	05:52:50
15	personality. He -- he's not really experienced in --	05:52:52
16	in the world of Hollywood and moviemaking. And he	05:52:54
17	seemed to be -- present himself as more of a business	05:52:59
18	man and he was feeling threatened and vulnerable.	05:53:01
19	And so I -- I measured it also that he was, you know,	05:53:05
20	trying to, at least with respect to me, kind of,	05:53:09
21	like, prove himself in that moment that I'm capable	05:53:12
22	of, you know, defending myself if I need to. And so	05:53:15
23	I think it was sort of in line with what his	05:53:18
24	personality is, which I had blocked from the very	05:53:21
25	beginning, that he's just an intense man. And so I	05:53:24

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1	just wanted to make sure that, you know, he had	05:53:27
2	nothing to worry about. And so, you know, I did	05:53:30
3	mention it to Ange in this exchange.	05:53:32
4	Q. And when he said, "I will spare no	05:53:34
5	expense," he said that in an aggressive manner?	05:53:36
6	A. I -- I don't recall.	05:53:40
7	Q. And then you write, "I've been texting	05:53:43
8	Jamey to make sure he is managed and to make sure he	05:53:46
9	speaks with me before doing anything nuclear."	05:53:48
10	Do you see that --	05:53:51
11	A. Yes. Correct.	05:53:52
12	Q. You were concerned that Mr. Sarowitz would	05:53:53
13	do something nuclear?	05:53:56
14	A. I was worried about him potentially	05:53:57
15	going -- going legal or litigious with Blake and Ryan	05:54:00
16	because that's what he mentioned he would need to	05:54:05
17	potentially do in the event he had to. And so my --	05:54:09
18	my reference here is the conversation I had with	05:54:11
19	Jamey in which I brought it up to Jamey and	05:54:12
20	suggest -- your know, just to basically say, you	05:54:15
21	know, the conversation I had with Steve was what I	05:54:17
22	just described here. And so that's what I was	05:54:19
23	referencing.	05:54:24
24	Q. And so your version of nuclear was just	05:54:25
25	filing the lawsuit?	05:54:27

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1	A. Yes. That's the only thing that he	05:54:27
2	mentioned to me. He used the word "legal," and that	05:54:35
3	was the only context in which he mentioned anything	05:54:35
4	to me.	05:54:36
5	MS. GOVERNSKI: Okay. I'm gonna mark	05:54:36
6	Exhibit 30.	05:54:41
7	(Exhibit 30 for identification.)	05:54:43
8	MS. LEADER: Counsel, after this exhibit,	05:54:43
9	can we take a five-minute break?	05:54:47
10	MS. GOVERNSKI: Yeah. I have just one more	05:54:47
11	module after this, and then I probably will be done.	05:54:48
12	But we can take a break.	05:54:48
13	Q. Okay. What I just handed you is WME 1319.	05:54:51
14	Do you see that in front of you?	05:54:59
15	A. I do.	05:55:00
16	Q. Do you recognize this?	05:55:01
17	A. Yes, I do.	05:55:02
18	Q. Okay. Do you see in the first paragraph,	05:55:03
19	you say, "I think we're on a good path here. There's	05:55:08
20	a truce between the publicists on both sides," and	05:55:11
21	your last sentence in that paragraph is, "I had to	05:55:15
22	dial down the billionaire at the premiere who is	05:55:17
23	ready for serious battle."	05:55:21
24	Do you see that?	05:55:22
25	A. Yes.	05:55:26

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1	Q. Who is the billionaire that you're	05:55:26
2	referring to here?	05:55:26
3	A. Steve Sarowitz.	05:55:28
4	Q. And again, why did you use the term --	05:55:30
5	strike that.	05:55:32
6	Why did you use the term -- well, strike	05:55:32
7	that.	05:55:32
8	Why did you use the term, "ready for	05:55:34
9	serious battle"?	05:55:34
10	A. Well, it's just a continuation of what I've	05:55:35
11	been saying the past five minutes. That he felt	05:55:39
12	threatened. And "battle" refers to potentially	05:55:40
13	having to get into a legal dispute.	05:55:42
14	MS. GOVERNSKI: Okay. Let's take a quick	05:55:47
15	break, and then just think I just have two more	05:55:49
16	minutes of questions.	05:55:52
17	MS. GAROFALO: Can we get a time check for	05:55:54
18	both sides, please?	05:55:56
19	THE VIDEOGRAPHER: Yes, let's go off the	05:55:57
20	record first.	05:55:59
21	MS. GAROFALO: Sure.	05:56:00
22	THE VIDEOGRAPHER: We're going off the	05:56:01
23	record. The time is 5:55 p.m.	05:56:02
24	(Recess taken.)	06:17:15
25	THE VIDEOGRAPHER: We are back on the	06:17:15

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1	record. The time is 6:16 p.m.	06:17:17
2	Q. BY MS. GOVERNSKI: Mr. Greenberg, did you	06:17:22
3	tell anyone that Mr. Sarowitz told you that he was	06:17:25
4	prepared to spend a hundred million dollars to ruin	06:17:27
5	Ms. Lively's life?	06:17:30
6	MS. GAROFALO: Objection.	06:17:32
7	THE WITNESS: I -- again, I don't recall	06:17:33
8	him being specific about that number. But I did have	06:17:34
9	a conversation with Warren Zavala, my colleague,	06:17:39
10	about that. It's possible I had a conversation --	06:17:41
11	well, let's go back.	06:17:45
12	First of all, I don't have any memory of	06:17:47
13	him mentioning ruining anyone's life. But the	06:17:48
14	conversation that I did have with him, I did a	06:17:51
15	conversation with Warren Zavala about that	06:17:55
16	afterwards. It's possible it came up with Patrick	06:17:57
17	Whitesell. But I do remember having an exchange with	06:18:00
18	Warren about it.	06:18:01
19	Q. And what did you tell Warren?	06:18:01
20	A. Basically, what I testified to earlier.	06:18:05
21	That, you know, I -- I -- making him aware of the	06:18:06
22	situation and the importance of everybody just	06:18:09
23	staying the course, focusing on getting the movie	06:18:12
24	open, and that Steve presented to me as somebody who	06:18:16
25	felt very sort of attacked and vulnerable and	06:18:20

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1	Mr. Sarowitz told you he was willing to spend a	06:19:31
2	hundred million dollars?	06:19:32
3	MS. GAROFALO: Objection.	06:19:33
4	THE WITNESS: Is it possible? Of course,	06:19:34
5	it's possible. I don't remember saying it.	06:19:37
6	Q. BY MS. GOVERNSKI: Who is Marie Sheehy?	06:19:39
7	MS GAROFALO: Objection --	06:19:39
8	THE WITNESS: Marie Sheehy, runs -- she's a	06:19:42
9	colleague. She runs our corporate communications,	06:19:46
10	WME.	06:19:48
11	Q. BY MS. GOVERNSKI: Is she your boss?	06:19:49
12	A. No.	06:19:51
13	Q. Do you recall telling her that Mr. Sarowitz	06:19:51
14	told you he was prepared to spend a hundred million	06:19:56
15	dollars?	06:20:00
16	A. Again, I don't recall telling anyone that	06:20:00
17	he said that figure. But it is possible that it came	06:20:03
18	up. Marie was engaged with the situation after the	06:20:07
19	movie opened. And so it's possible we had that	06:20:11
20	conversation. I just don't recall having it.	06:20:14
21	Q. Would it surprise you to learn that	06:20:15
22	Ms. Sheehy recalls you telling her that Mr. Sarowitz	06:20:19
23	conveyed to you that he was prepared to spend a	06:20:22
24	hundred million dollars to ruin Ms. Lively's life?	06:20:25
25	MS. GAROFALO: Objection.	06:20:28

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1	THE WITNESS: I don't have any memory of	06:20:29
2	having a conversation with anyone about Steve	06:20:30
3	Sarowitz ruining anyone's life.	06:20:33
4	Q. BY MS. GOVERNSKI: Okay. Would it surprise	06:20:36
5	you to learn that Marie Sheehy recalls you telling	06:20:38
6	her that Mr. Sarowitz was prepared to spend a hundred	06:20:41
7	million dollars?	06:20:46
8	MS. GAROFALO: Objection.	06:20:46
9	MS. LEADER: Join.	06:20:48
10	THE WITNESS: If I had the conversation	06:20:48
11	with her, that wouldn't surprise me.	06:20:49
12	Q. BY MS. GOVERNSKI: And what about Patrick	06:20:51
13	Whitesell? Did you convey any statements to	06:20:57
14	Mr. Whitesell regarding your conversation with Mr.	06:20:59
15	Sarowitz?	06:21:02
16	A. I don't recall specifically having it. I	06:21:02
17	do believe there was a text exchange that we covered	06:21:04
18	with -- with respect to that issue.	06:21:08
19	Q. So it's possible that you conveyed to	06:21:10
20	Mr. Whitesell that Mr. Sarowitz told you he was	06:21:13
21	prepared to spend a hundred million dollars?	06:21:17
22	A. Yes, that --	06:21:21
23	MS. GAROFALO: Objection.	06:21:21
24	THE WITNESS: That's possible.	06:21:22
25	Q. BY MS. GOVERNSKI: Was It Ends with Us a	06:21:24

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Danny Greenberg
Conducted on September 19, 2025

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1 STATE OF CALIFORNIA)
)
2 COUNTY OF LOS ANGELES)

3

4 I, Mark Schweitzer, Certified
5 Shorthand Reporter No. 10514, do hereby
6 Certify:

7 That prior to being examined, the witness
8 named in the foregoing deposition was by me duly
9 sworn to testify the truth, the whole truth, and
10 nothing but the truth;

11 That said deposition was taken down by me
12 in shorthand and thereafter reduced to print by
13 means of computer-aided transcription; and the same
14 is a true, correct, and complete transcript of said
15 proceedings.

16 I further certify that I am not interested in
17 the outcome of the action.

18 Witness my hand this 22nd day of September,
19 2025.

20



21

22 MARK SCHWEITZER, CSR #10514, RPR, CRR
23 Certified Shorthand Reporter
24 In and for the State of California

25

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