

September 25, 2025

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,
Plaintiff,
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)
25-CV-449 (LJL) (MEMBER CASE)
WAYFARER STUDIOS LLC, ET AL.
Defendants.

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

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

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VIDEO-RECORDED DEPOSITION OF JENNIFER ABEL
Los Angeles, California
Thursday, September 25, 2025

Stenographically Reported by: Ashley Soevyn,
CALIFORNIA CSR No. 12019

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1 few things.

2 One, it's important that you listen to my
3 question, let me finish, and then you'll answer
4 audibly, not with an mm-hmm, uh-huh, so the court
5 reporter can take down your answers. I will give
6 you the same courtesy of finishing, just so we have
7 a clear transcript.

8 And if you don't understand my question,
9 please ask me for clarification. Otherwise, I'm
10 going to assume that you understood it and we'll
11 proceed from there.

12 Is there any reason that you can't give
13 your best testimony today?

14 A No, there's not.

15 Q Ms. Abel, where do you work now?

16 A I have my own company, RWA
17 Communications.

18 Q And did you start RWA?

19 A Yes.

20 Q When did you start RWA?

21 A September 1st, 2024.

22 Q And what is RWA?

23 A It's a public -- public relations firm.

24 Q Generally speaking, can you tell me what
25 it does?

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1 A Sure. I handle public communications,
2 public relations on behalf of entertainment, mainly,
3 clients.

4 Q Entertainment, mainly. Any other types
5 of clients?

6 A Entrepreneurs.

7 Q Anything else?

8 A No.

9 Q Okay. Going back to where you were
10 before RWA, were you at Jonesworks?

11 A Yes.

12 Q And did you make the decision to join
13 Jonesworks in 2020?

14 A Yes.

15 Q Why did you decide to come to Jonesworks?

16 A I was contacted by a recruiter, who asked
17 if I would be interested in leaving my current -- my
18 previous firm, PMK, and so I -- I was interviewed.

19 Q And what was your initial title at
20 Jonesworks?

21 A Vice president.

22 Q And what was your position as vice
23 president?

24 A I was to oversee the talent department in
25 Los Angeles.

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1 Q And after the [REDACTED], did your
2 communications decrease in terms of frequency?

3 A No, because the [REDACTED] was ongoing.
4 There was multiple cities, so our communications
5 continued.

6 Q And were these communications just
7 between the two of you?

8 A Not always, no. There were -- I had a
9 team of -- of -- let's see -- on that account,
10 probably around four people, four to five people who
11 were privy to a majority of those conversations.

12 Q Would you say you communicated with her
13 more frequently -- well, strike that.

14 How did you communicate with Ms. Nathan?

15 A The -- the means in which we
16 communicated? Phone, email, text message.

17 Q Signal?

18 A No.

19 Q Have you ever communicated with
20 Ms. Nathan on Signal?

21 A Following this -- for -- following this
22 litigation, yes. For this litigation, yes.

23 Q Prior to this litigation, had you ever
24 communicated with Ms. Nathan on Signal?

25 A I -- I don't recall. I know that there

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1 was conversations of starting Signal. I wasn't
2 using it at the time. I was being asked to download
3 it. I -- I -- I'd have to go through either
4 documents, or maybe my memory can be recollected
5 later, when I actually downloaded Signal and we
6 started communicating.

7 Q Who asked you to download Signal?

8 A So I had --

9 MR. FREEDMAN: If -- I would instruct you
10 not to answer --

11 THE WITNESS: Sure.

12 MR. FREEDMAN: -- to the extent this
13 invades the attorney-client privilege.

14 THE WITNESS: Uh-huh. Well, initially
15 Stephanie Jones asked me to download Signal. She
16 used it frequently. And we were working together
17 with a client to -- who primarily used Signal. And
18 then after that client terminated us, I had
19 deactivated the app because I didn't use it for
20 anything else.

21 BY MS. TAHLER:

22 Q And after that deactivation, up until the
23 time of this lawsuit, did you reactivate Signal?

24 A Yes.

25 Q And why was that?

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1 A Again, it was -- I believe that this
2 would be attorney protected.

3 Q When was this?

4 A When? August. It would be August. I
5 don't recall when in August. I apologize. But it
6 would be August 2024.

7 Q An attorney instructed you to download
8 Signal?

9 A I don't believe the attorney -- an
10 attorney instructed me to download it, initially,
11 but my communications in Signal are with attorneys.

12 Q Which attorneys?

13 A My attorneys, Bryan Freedman, et al.

14 Q And you had Signal communications with
15 Mr. Freedman -- this is just a yes-or-no answer --

16 A Uh-huh.

17 Q -- in August of 2024?

18 A I -- I believe a chain was started. I
19 don't think there were communications on that chain.

20 Q Was Mr. Freedman your personal attorney
21 in 2024?

22 A No.

23 Q Was he an attorney for Mr. Baldoni?

24 A He --

25 MR. FREEDMAN: Just to clarify, you're

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1 asking her in August '24, 2024, or anytime in 2024?

2 MS. TAHLER: I'm asking at this time, the
3 Signal chat.

4 MR. FREEDMAN: August '24?

5 MS. TAHLER: Yes.

6 MR. FREEDMAN: Listen to the question.

7 THE WITNESS: In August 2024, no.

8 BY MS. TAHLER:

9 Q Do you know whose client was
10 Mr. Freedman's in August of 2024?

11 A No.

12 Q The client that you referred to earlier
13 that you were communicating with via Signal with
14 Ms. Jones, was that [REDACTED] ?

15 A No.

16 Q Who was it?

17 A Do you want to go on?

18 Q We're still on.

19 A Okay. Sorry. [REDACTED].

20 Q Did you ever communicate with [REDACTED]
21 on Signal?

22 A No.

23 Q With any of his people?

24 A I don't -- I don't recall [REDACTED] using
25 Signal. Stephanie asked that I download Signal

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1 specifically for our work on behalf of [REDACTED]
2 I don't recall if I ever used that app for [REDACTED]
3 [REDACTED]

4 Q After downloading Signal in August of
5 2024, do you recall actually having communications
6 in it?

7 A No.

8 Q You don't recall one way or another, or
9 there weren't communications?

10 A I don't recall one way or another if
11 there were communications in Signal --

12 Q Do you know?

13 A -- in August.

14 Q Do you know how many people were part of
15 the chat that you've been testifying to in the
16 August 2024 time period?

17 A No, I don't. I just know that's when I
18 started Signal, and I don't recall start having any
19 communications in the app. That's when I opened the
20 app, or re-downloaded the app. Sorry.

21 Q In the chat with Mr. Freedman that you
22 referred to earlier, do you recall any others that
23 were in that chat?

24 A No, I don't. I just recall potentially
25 starting a thread, but I don't -- I don't believe we

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1 ever used it.

2 Q Who is the "we" in that statement?

3 A Oh, sorry. Me and Bryan Freedman.

4 THE STENOGRAPHIC REPORTER: Exhibit 5 for
5 the record.

6 (Exhibit 5 marked for identification.)

7 BY MS. TAHLER:

8 Q And I apologize, I should have asked
9 another question before we get to this exhibit.

10 A Okay.

11 Q Did you communicate -- would you
12 communicate from time to time on WhatsApp?

13 A I did use the app WhatsApp. I'm unclear
14 if I used it for business purposes. I don't believe
15 so, but I -- I'm -- I'd have to think more about
16 that, if I used it for business.

17 Q Do you recall if you communicated with
18 Ms. Nathan on WhatsApp?

19 A I don't recall communicating with her on
20 WhatsApp, no.

21 Q Ms. Abel, you've been shown what has been
22 marked Abel 5. It's a document Bates-stamped
23 Jonesworks_JA, several zeroes, ending in 789.

24 Do you recognize this document?

25 A I'm just -- I'm just looking at it really

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1 referencing when there was a discussion about
2 bringing on crisis for Wayfarer and Mr. Baldoni?

3 A Yes.

4 Q And at the end, you tell Ms. Jones that
5 you've:

6 (As read:)

7 "Only ever worked with [REDACTED] or
8 [REDACTED] not familiar with [REDACTED] but
9 trust your recs."

10 Did you recommend those firms to
11 Wayfarer?

12 A Yes.

13 Q Who did you recommend them to?

14 A Tera Hanks.

15 Q Do you know whether or not Wayfarer
16 actually reached out to either of those firms?

17 A I do not.

18 THE STENOGRAPHIC REPORTER: Exhibit 15.

19 MS. TAHLER: Sorry. Hold on.

20 BY MS. TAHLER:

21 Q You also recommended Melissa Nathan to
22 Wayfarer; isn't that right?

23 A Yes.

24 Q Who did you recommend her to?

25 A I -- I recall Jamey Heath and I having

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1 MR. FREEDMAN: Objection. Same
2 instruction.

3 THE WITNESS: Outside of that
4 instruction, no.

5 BY MS. TAHLER:

6 Q Do you believe that any security measures
7 were circumvented in accessing your iCloud?

8 A I am not sure. Sorry.

9 Q In your counterclaims, you assert -- or
10 allege that you were ordered to provide your
11 passcode to your company iPhone.

12 Who ordered you to provide your passcode?

13 A Gordon Duren, Stephanie's chief of staff.

14 Q What did he say?

15 A After I had clarified to both him and the
16 lawyer who was present that if I were to leave, that
17 they would release the number back to me if I were
18 to go directly to Verizon, which would then render
19 the cell phone inactive. I had specified to the
20 lawyer who was there that it was also my personal
21 phone.

22 THE VIDEOGRAPHER: Somebody from Liner's
23 office.

24 THE WITNESS: So as I said before, it was
25 communicated to me after I said, for clarity, it was

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1 agreed that my personal cell phone number would be
2 released back to me, which would render the phone
3 inactive. I clarified with the lawyer who was
4 present that it was my personal cell phone, that I
5 had private stuff on there. And Gordon says, "Yes,
6 right?" And looked at the lawyer, and the lawyer
7 said, "Yes, that's fine. It would render that phone
8 inactive." And so I said, okay. I handed it over.
9 And as I was walking out, Gordon says, "We need your
10 passcode."

11 Q What would have happened if you didn't
12 provide your passcode?

13 MR. FREEDMAN: Objection.

14 THE WITNESS: I don't know. It was my
15 assumption in the context of that conversation that
16 they needed the passcode in order to release the
17 phone back to me.

18 BY MS. TAHLER:

19 Q You provided your password, correct?

20 A Yes.

21 Q You didn't ask, Oh, can I not give you my
22 passcode? I don't want to give you my passcode.
23 Anything like that?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: I wasn't given a choice.

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REPORTER'S CERTIFICATE

I, ASHLEY SOEVYN, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was put under oath by me;

That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That a review of the transcript by the deponent was/ was not requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 26th day of September, 2025.



ASHLEY SOEVYN

September 26, 2025

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,
Plaintiff,
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)
25-CV-449 (LJL) (MEMBER CASE)
WAYFARER STUDIOS LLC, ET AL.
Defendants.

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

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

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VIDEO-RECORDED DEPOSITION OF JENNIFER ABEL
Los Angeles, California
Friday, September 26, 2025
Stenographically Reported by: Ashley Soevyn,
CALIFORNIA CSR No. 12019

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,
Plaintiff,
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)
25-CV-449 (LJL) (MEMBER CASE)
WAYFARER STUDIOS LLC, ET AL.
Defendants.

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

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

****CONFIDENTIAL****

Video-recorded Deposition of
JENNIFER ABEL, taken on behalf of the Plaintiff
Blake Lively, Pursuant to Notice, at the offices of
Willkie Farr & Gallagher, 2029 Century Park East,
Los Angeles, California beginning at 9:12 a.m. and
ending at 6:52 p.m. on Friday, September 26, 2025,
before me, ASHLEY SOEVYN, California Certified
Shorthand Reporter No. 12019.

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Page 3

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1 A P P E A R A N C E S:

2 For the Defendants Wayfarer Studios LLC, Jennifer
3 Abel, Melissa Nathan and Justin Baldoni, Jamey Heath
4 and Steve Sarowitz:

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2 For the Defendants Wayfarer Studios LLC, Jennifer
3 Abel, Melissa Nathan and Justin Baldoni, Jamey Heath
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1 A P P E A R A N C E S :

2 Also Present:

3 Melissa Nathan

4 Jamey Heath, Defendant (Via Zoom)

5 Justin Baldoni, Defendant (Via Zoom)

6 Chelsea Gilchrist, Veritext Legal Solutions

7 Concierge (Via Zoom)

8 Jonathan Bach, Esq. (Via Zoom)

9 Jacob Florez, Videographer

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1 A Yes.

2 Q What are strategic partnerships?

3 A I would say my definition of a strategic
4 partnership is when a client is coming out with a
5 product or is an ambassador of an organization or
6 clothing company, just to be specific, that that
7 would be a strategic partnership. And I would work
8 on behalf of my client to handle the communications
9 surrounding that partnership.

10 Q Okay. Thank you, Ms. Abel.

11 From -- let's say from the August 1st,
12 2024 through, let's call it, the end of
13 September 2024, that period of time, so we're
14 specific about the time period we're talking about
15 here. At some point during that period of time, RWA
16 launched; is that right?

17 A In September.

18 Q In September?

19 A So you have to be specific. Yes.

20 Q Okay. So let's just say whenever -- do
21 you know the date in September it launched?

22 A September 1st.

23 Q From September 1st through the end of
24 2024 then, did RWA have any other employees or staff
25 besides yourself?

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1 like the -- you know, you don't like the person's
2 past or their history or their reputation?

3 MR. FREEDMAN: Objection.

4 THE WITNESS: I think to better answer
5 your question, as a personal publicist, I'm able to
6 make decisions based on who I think I'm able to
7 represent based on my aligning values.

8 BY MR. GOTTLIEB:

9 Q Okay. Do you typically do like a
10 background investigation or look into your clients
11 when you have new opportunities presented to you?

12 A I think the extent of my ability to do a
13 background investigation is to Google. I'm sure
14 I've done that in the past.

15 Q Okay. When did you first meet
16 Justin Baldoni?

17 A In 2020.

18 Q What were the circumstances in which you
19 met him?

20 A I became his publicist and started
21 running his account.

22 Q How did that come about?

23 A When I was employed at Jonesworks, I was
24 hired to oversee the entire talent and entertainment
25 department, and he was a talent client at that time.

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1 Q Okay. Do you remember when in 2020 this
2 was?

3 A I believe I was hired at the end of
4 July 2020. So it would have been sometime around
5 that time period.

6 Q And were -- were you introduced to
7 Mr. Baldoni through someone at Jonesworks or how --
8 how did that come about?

9 A I'm trying to remember -- I apologize --
10 the first time that I met him. I believe there was
11 a photo shoot and I came to set, and that was the
12 first time that we met. But again, I'm -- it's a
13 long time ago so I'd have to think more about that,
14 and I can correct that later.

15 Q Do you remember where that was?

16 A I do not. Sorry.

17 Q Did you meet anybody else at Wayfarer
18 Studios when you were brought in, in 2020 to work
19 with Mr. Baldoni?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: So I don't recall the exact
22 date of when I was introduced to the Wayfarer team.
23 Yeah, I apologize. I don't recall the exact date.

24 BY MR. GOTTLIEB:

25 Q At that time in 2020, were you

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1 representing Mr. Baldoni personally or Wayfarer
2 Studios or some combination of both?

3 A At Jonesworks, they were the same. They
4 were kind of the same contract, the same agreement.
5 So I oversaw them as one client.

6 Q Okay. When did you first meet
7 Jamey Heath?

8 A Again, I'd have to refresh my memory when
9 he joined Jonesworks. I apologize, I don't have
10 that date readily available.

11 Q Do you know what year it might have been
12 in?

13 A Yeah, I would say -- oh, gosh, time
14 flies. I would say probably around, to the best of
15 my recollection -- again, I -- sitting here today, I
16 may have to come back and correct this. I would say
17 2022.

18 Q Okay. How about Steve Sarowitz?

19 A Steve, I met much later. Actually, I
20 don't recall when I first met Steve. Yeah, I
21 apologize. I don't recall when I met Steve for the
22 first time.

23 Q Do you have any recollection of when you
24 first learned of Steve Sarowitz, of his existence?

25 A Of -- of course. When I was brought on

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1 to oversee Justin and the Wayfarer account, I was
2 aware that Steve Sarowitz was the founder.

3 Q Okay. Did you have any understanding of
4 who paid the bills for this account?

5 A No.

6 Q Who else worked with you -- and we'll
7 have to take this in -- in chunks, so let's say 2020
8 through -- well, just strike that.

9 By the time we get to 2023, January of
10 2023, who else worked with you on the Baldoni
11 Wayfarer account at Jonesworks?

12 A Sure. So in 2023 -- would you like me to
13 name the employees?

14 Q Please.

15 A Matthew Mitchell, Matthew Gibson, Audrey
16 Hixon, Ande Bowser. We had brought on a digital
17 team at that time to work with Justin, so that
18 included James Knobloch, Henry Hargitai, Nate Woldu,
19 was a videographer. And as I mentioned before,
20 Raquel Harris was tapped into very briefly for about
21 a month or so of that time.

22 Q Thank you. That's very helpful.

23 Were any of those people --

24 A Oh, and -- I'm so sorry.

25 Q No, go ahead.

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1 Q When do you recall -- was there a point
2 in time that you can recall, as you sit here today
3 without looking back through documents, Mr. Baldoni
4 deciding that he wanted his social media feed to
5 exclusively focus on issues of domestic violence?

6 A Yes.

7 Q When was that?

8 A In that August time frame.

9 Q Do you remember what day?

10 A I don't recall.

11 Q Okay. If I told you it was around
12 August 8th, would that sound right to you?

13 A I will take your word for it. It was
14 around that time.

15 Q Do you have a recollection of whether
16 that was after the premiere or before it?

17 A That was after the premiere, before the
18 release.

19 Q Okay. And do you have that recollection
20 only because I said August 8th, or because you
21 actually remember it was after the premiere that he
22 decided that he wanted to start focusing on domestic
23 violence?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: You said August 8. The

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1 BY MR. GOTTLIEB:

2 Q Ms. Abel, you're being handed what's been
3 marked as Exhibit 47, which is a document bearing
4 the Bates No. 16763 through 16768. And I'm only
5 asking you about the itinerary that you'll find on
6 the last page, not asking you anything about the
7 voluminous email traffic that gets to it.

8 A Okay.

9 Q Ms. Abel, one of the earliest press
10 events for this film was a trailer watch event on
11 May 6th, 2024; is that correct?

12 A Yes.

13 Q Did you attend that event?

14 A I did.

15 Q Do you recall it?

16 A Vaguely. But yes, I do.

17 Q Do you see a reference at the top of the
18 page marked 16768, the last page of this document,
19 referencing that there would be 70 to 80 creators,
20 influencers or media members present?

21 A Yes.

22 Q Did Mr. Baldoni give an interview at this
23 event?

24 A It was a roundtable discussion paired
25 with Colleen Hoover.

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1 Q Was this referred to as a EPK interview
2 or something like that?

3 A I can't recall if this was the same day
4 that we did the interview with Entertainment Tonight
5 prior to this when both -- when Justin and Colleen
6 were together. I don't see that that's noted on
7 here.

8 Q Okay. Do you have any recollection of
9 the kinds of creators or influencers that were
10 invited to this event?

11 A I don't know how they were selected, no.

12 Q Do you have any idea whether some of them
13 were people who are familiar with the book or had
14 covered the book? Was there any -- was there any
15 interest in getting people like that at this event?

16 A I did not participate in getting people
17 to this event.

18 Q Okay. Was this -- who was this event
19 planned by? Was it planned by Sony, Wayfarer, both
20 collaboratively?

21 A Sony.

22 Q Did Wayfarer or Mr. Baldoni object to
23 this event?

24 A Object to it, no.

25 Q Did Wayfarer or Mr. Baldoni express any

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1 concerns prior to this event that you can recall?

2 A No, not that I can recall.

3 Q Did Mr. Baldoni ever tell you he didn't
4 want to attend this event?

5 A Not that I can recall.

6 Q This event involved, as you can see, a
7 teamed reception for influencers at 3:00 o'clock
8 p.m. and a floral arranging demonstration with a
9 floralist and Colleen Hoover and Justin Baldoni.

10 Do you see that?

11 A Yes, following the roundtable discussion.

12 Q And fans are welcome to bring their
13 bouquets for photos at 3:45 p.m.

14 Do you see that?

15 A Yes.

16 Q Was there a social media backlash to this
17 event?

18 A I don't recall.

19 Q You have any recollection of any kind of
20 negative reaction to selling It Ends with Us with
21 floral-themed events where bouquets of flowers were
22 made?

23 A Not that I can recall.

24 Q You were never asked to respond to or
25 address anyone that you can remember, as you sit

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1 (As read) :

2 "She doesn't like how much we lean into
3 the domestic abuse storylines, but you
4 know that and it's about finding a
5 balance"?

6 A Yes.

7 Q You had previously communicated to
8 Mr. Baldoni that Sony did not like how much he had
9 leaned into the domestic abuse storylines?

10 A Yes.

11 Q Mr. Baldoni responds at 8:54:

12 (As read) :

13 "Yeah, maybe some slack can be given
14 considering the terrorist attack
15 concurrently happening lol."

16 Do you see that?

17 A Yes.

18 Q Did you understand what he was referring
19 to when he referenced a "terrorist attack"?

20 A I'd have to recall world events happening
21 on or around the state. I apologize. Not in this
22 moment.

23 Q As you sit here today, you have no
24 recollection at all of whether he was referencing a
25 literal terrorist attack or a figurative one?

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Terrorist -- I -- I don't
3 recall.

4 BY MR. GOTTLIEB:

5 Q Do you have any understanding at all why
6 he was asking for some slack?

7 MR. FREEDMAN: Objection.

8 THE WITNESS: I don't recall.

9 BY MR. GOTTLIEB:

10 Q Did you ever receive written feedback
11 from Sony on the EPK interview?

12 A Yes.

13 Q And did you share that feedback with
14 Mr. Baldoni?

15 A Yes.

16 Q Do you have a recollection -- we'll start
17 at a high level and then see how much you remember.
18 Do you have a level -- a recollection at a high
19 level of what the gist of Sony's messaging to
20 Mr. Baldoni was?

21 A The gist "high level" was that he spoke
22 too much about the domestic abuse survivor community
23 and as that was why he wanted to make the film.

24 Q And they wanted a lighter focus in the
25 marketing?

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1 A I believe that was part of the feedback
2 they were given. It was a lengthy email, if I can
3 recall. I don't recall the full email.

4 Q They gave lengthy feedback on what to
5 emphasize and what to avoid in marketing the film?

6 A Are you referring to that specific email
7 or just in general?

8 Q Around this time, did -- did Sony give
9 lengthy feedback in writing that you reviewed about
10 how to market the film?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: Feedback in context to how
13 Justin was answering his EPK interviews.

14 BY MR. GOTTLIEB:

15 Q Okay. Do you recall -- do you recall
16 Sony saying that the main point they wanted
17 Mr. Baldoni to hit was that this is an entertaining
18 blockbuster film, movie of the summer that everyone
19 will enjoy regardless of their own experiences, or
20 lack thereof, with abuse?

21 A I would have to review the specific
22 language that they used. It's been a while.

23 Q Okay. Do you have any recollection of
24 saying that you agreed with Sony's point of view?

25 A Yes, and about finding a balance.

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1 Mr. Baldoni on social media; is that right?

2 A In reference to that communication on
3 August 5th that we're discussing specifically,
4 yes, that's what I recall.

5 Q And the idea was that this language --

6 A Uh-huh.

7 Q -- which we'll get to. This language was
8 something Mr. Baldoni could say in the press that
9 would -- I think the word used was "normalize" --

10 A Uh-huh.

11 Q -- the unfollowing of him on social
12 media; is that right?

13 A Not normalizing the act, but normalizing
14 and de-sensationalizing any social media commentary
15 surrounding fans picking up on that fact.

16 Q Okay. So that was a deliberate strategy
17 of how to place this language or concept into one of
18 Mr. Baldoni's statements in order to defend against
19 or alter a narrative that you all saw emerging in
20 social media; is that what you just said?

21 A No, I don't agree with that
22 characterization.

23 Q What don't you agree about with it?

24 A That language was provided as guidance.
25 It was not with the intention, in your words, to

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1 provide guidance to my client of how he can still be
2 authentic in his messaging, and yet, again, kind of
3 be desensationalized, should that narrative take
4 hold and cross over into traditional media.

5 Q And so if I'm understanding you, one of
6 the benefits of getting ahead of the narrative by
7 making some kind of a statement, is that if the
8 narrative later comes out, you can point back to
9 whatever the thing is that the client has said, and
10 said, we already said that, see?

11 A It desensationalizes it.

12 Q It's not new?

13 A It's not new; it's not exciting.

14 Q We talked about that already. You don't
15 need to cover it.

16 A Exactly. It desensationalizes it.

17 Q Okay. You're aware, though, that Sony
18 disagreed that using the word "fiction"[sic] would
19 desensationalize what was happening, right?

20 A Friction. Kimberly Wire, who was in the
21 interviews with me, I believe had messaged me and
22 said that she didn't -- she kind of caught that word
23 and flagged it for me.

24 Q And she, in fact, said:

25 (As read):

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1 this way. Actually, keep that one. Keep these two
2 handy.

3 THE WITNESS: Okay.

4 MR. GOTTLIEB: The last two.

5 This is Exhibit 54.

6 Am I right on my numbering here?

7 (Exhibit 54 marked for identification.)

8 THE STENOGRAPHIC REPORTER: Yes, you are.

9 MR. GOTTLIEB: It's a miracle. Okay.

10 BY MR. GOTTLIEB:

11 Q So Exhibit 54 is a document bearing the
12 Bates range 14980 to 14982. And this one, I
13 believe, is a text exchange between you and
14 Mr. Baldoni; is that right?

15 A Oh, I'm sorry, which -- no, this one is
16 between -- yes, it is between me and Justin. Yes,
17 thank you.

18 Q And this is on August 5th; is that right?

19 A Yes.

20 Q And the first message there is 10:42 a.m.
21 Do you see that?

22 A Yes.

23 Q So this is when you were communicating to
24 Mr. Baldoni the feedback that Ms. Wire had given to
25 you about trying to not use the word "friction"?

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1 A Yes.

2 Q Are so does this refresh your
3 recollection that you gave that advice to him by
4 text message rather than in person?

5 A I did both.

6 Q Okay. So you say to him here:

7 (As read):

8 "Sony is having a hard time with the
9 word 'friction.' They think it will be
10 taken out as clickbait. They obviously
11 don't know about our strategy, but
12 let's stick to the words of
13 'challenge.'"

14 And then you continue.

15 A Correct.

16 Q Did he shift to the word "challenge"
17 after this?

18 A He did.

19 Q What was your strategy that you were
20 referring to that Sony did not know about?

21 A About providing guidance to
22 desensationalize what we anticipated at that time.
23 The social media commentary picking up on the fact
24 that the cast had unfollowed him, and he was not
25 present in any of the marketing materials with the

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1 cast.

2 Q Okay.

3 It looks like about 90 minutes later, he
4 sends you an image, a screenshot, that says, "This
5 is what we would need."

6 A Uh-huh.

7 Q We're going to -- I'm going to come back
8 to a few questions about this later, but what
9 happened between 10:42 and 12:06 that prompted
10 Mr. Baldoni to send this image to you on August 6th?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: I have to look at the
13 timing of the other documents. I'm not sure if we
14 were still in press at that time or what.

15 BY MR. GOTTLIEB:

16 Q Okay. And then you make a comment right
17 after he sends the screenshot to you that says --
18 and he says:

19 (As read) :

20 "This is what we would need."

21 And you respond:

22 (As read) :

23 "Yes. I literally just spoke to
24 Melissa about this on the break about
25 what we discussed last night for social

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1 email from Danni Maggin to Jacob Johnson, copying
2 Gloria Hann and Danielle Misher.

3 Who is Danni Maggin?

4 A Sony publicity.

5 Q And were you in contact with Danni Maggin
6 around this time, around August 5th?

7 A Yes.

8 Q Talking about press about -- around the
9 release of the film?

10 A Yes.

11 Q Does Ms. Maggin here reference the Dallas
12 Morning News interview that we were just discussing?

13 A Yes. I haven't seen this document
14 before, so I'm just going to read it.

15 Okay.

16 Q Do you see that Ms. Maggin is saying that
17 Josh said Mr. Baldoni shouldn't do any more press
18 after this?

19 A Yes.

20 MR. FREEDMAN: Object.

21 BY MR. GOTTLIEB:

22 Q Who is Josh a reference to?

23 A Josh Greenstein.

24 Q And who is that?

25 A I don't know his exact title, but I

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Not that I can recall.

3 BY MR. GOTTLIEB:

4 Q Did Mr. Baldoni ever tell you that
5 because of his neurodivergence, he sometimes says
6 awkward things or impulsive things that he later
7 regrets saying?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: He e-mailed or texted or
10 emailed, I don't remember the method, in relation to
11 a podcast interview that he was asking if he should
12 do.

13 BY MR. GOTTLIEB:

14 Q Did you have any concerns about that when
15 he was approaching press for this film?

16 A Concerns about what? Sorry.

17 Q Impulsive speech or an inability to stay
18 on message?

19 A No.

20 Q Okay.

21 Jonesworks had -- we talked about before,
22 its contract -- oh, sorry. Just one more thing
23 about the Dallas Morning News interview. That never
24 ran, right?

25 A No, not to my knowledge, no.

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1 Q Sony was basically able to kill it?

2 A We pulled the tape.

3 Q And how did you do that?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: In that setting, in a press
6 junket, it is typically -- you have one camera
7 operator. They are rolling tape for all of the
8 interviews, and then you hand the tape of the
9 segment to the reporter. I wasn't part of that
10 facilitation, but it was my understanding that it
11 was in our control, and we had the ability to pull
12 the tape.

13 BY MR. GOTTLIEB:

14 Q Okay. Let's shift to social media. We
15 talked before about Jonesworks. I think you
16 described it as "a significant amount of work." At
17 this time, it was going into Mr. Baldoni's social
18 immediate profile; is that right?

19 A Yes.

20 Q And is it fair to say there were times
21 when you would go through multiple drafts and text
22 with particular message that Mr. Baldoni would post
23 on his Instagram feed?

24 A Yes.

25 Q And I'll ask you this because I think

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1 you'll otherwise say it, but that's typical for
2 clients that you had advised in the social media
3 space; is that right?

4 A That is typical, yes.

5 Q So the social media post -- now back to
6 Mr. Baldoni, the social media post that he was
7 putting out on his Instagram page are during this
8 period of time, particular ones that are being
9 vetted through and edited by the social media team,
10 right?

11 A Yes, the Jonesworks social media team,
12 yes.

13 Q Okay. Were there times that this -- that
14 you found this tedious?

15 A Yes.

16 Q Were there times that you felt like the
17 social media posts were overly curated?

18 A I'm sure I provided that feedback.

19 Q Maybe there was a bit more debate and
20 discussion on the precise wording of social posts
21 than you thought necessary?

22 A I'm sure, yes.

23 Q But what Mr. Baldoni's followers saw was
24 not any of that, or the debate, or the multiple
25 drafts, but instead the final product that went out

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1 at least according to Mr. Baldoni, from your flight
2 to Chicago, right?

3 A Yes.

4 Q And this is at the same time that you get
5 a text chain going about who was responsible for the
6 leak to the Daily Mail, right?

7 A Yes.

8 Q And as soon as Mr. Baldoni lands, he
9 sends this message and says:

10 (As read) :

11 "What is the TikTok strategy? I would
12 like you guys to start posting me ONLY
13 talking about domestic violence and
14 clips and why this movie is so
15 important."

16 Do you see that?

17 A Yes.

18 Q And then there's a discussion after that.
19 So to level set this instruction that came from
20 Mr. Baldoni to the social team, is it something that
21 the social team worked to implement?

22 A In -- in terms of cutting and providing
23 content of him talking about DV and clips and why
24 the movie is so important to him?

25 Q Yes.

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1 A Yes.

2 Q And he changed his profile and handle on
3 Instagram at some point in time?

4 A He put his bio to No More, with a link to
5 for resources.

6 Q And at first, you actually advise, don't
7 do that, it's too soon, right. "Too drastic too
8 soon," at 4:16 p.m.?

9 A Oh, I think that it's because I didn't
10 want to lose his link tree.

11 Q I see. So this is after the interview
12 with the word "friction," right?

13 A Yes.

14 Q And we're now on the 8th, and so there
15 are now stories that are starting to be in the works
16 using the word, or the concept, of a "feud," right;
17 that's what the Daily Mail story was about?

18 A Yes. To the best of my recollection,
19 that was.

20 Q And this was around the time that you all
21 were starting to see the commentary on social media
22 spill over into media-media, right?

23 MR. FREEDMAN: Objection.

24 THE WITNESS: Just for clarity, if I
25 recall correctly, it was starting to spill over

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1 at this time sitting here, but I'm happy to review
2 and I can speak to it.

3 Q Do you recall Mr. Baldoni comparing that
4 video or any other to one where he made a social
5 media post standing in front of a private jet during
6 a promotion of the film?

7 MR. FREEDMAN: Objection.

8 THE WITNESS: I -- so just for clarity, I
9 don't remember the comparison between the two. But
10 I do recall the video. They had done a deal with a
11 jet company to, during production as they needed to
12 get to locations quickly, and in support of the
13 film, they were able to do a deal with them to
14 assist them during production.

15 BY MR. GOTTLIEB:

16 Q Okay. All right.

17 So we talked earlier about how you
18 started representing Mr. Baldoni and Wayfarer early
19 on. It was before filming of It Ends with Us began,
20 right?

21 A Yes.

22 Q And during the filming of
23 It Ends with Us, did you ever visit the set?

24 A No.

25 Q How often did you talk to either

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1 BY MR. GOTTLIEB:

2 Q Exhibit 57 is a document bearing the
3 Bates No. BALDONI_20412 through 20417. This appears
4 to be a text chain between you, Ms. Jones, Mr. Heath
5 and Mr. Baldoni, on November 10th, 2023?

6 A Yes.

7 Q And it starts around 9:53 p.m. and
8 concludes around 10:12 p.m.; is that right?

9 A Yes.

10 Q And do you recall this conversation?

11 A I do.

12 Q And in this conversation, Mr. Baldoni
13 reaches out and he says he needs you and Ms. Jones
14 on a Zoom, right?

15 A Yes.

16 Q And Mr. Heath says, "It begins again"?

17 A Yes.

18 MR. FREEDMAN: Are we missing a page
19 here? Goes from 2414 to 2416.

20 MS. TAUSTINE: It's this. It's the
21 picture of this bear.

22 MR. GOTTLIEB: It's missing an image from
23 the production. I will represent to you,
24 Mr. Freedman, it's a screenshot of this bear.

25 MR. FREEDMAN: I have that one here.

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1 MR. GOTTLIEB: Yeah.

2 MR. FREEDMAN: That's 24 -- that's 20413.

3 MR. GOTTLIEB: It's an entire page with
4 this reproduced on it.

5 BY MR. GOTTLIEB:

6 Q What did mister -- what did you
7 understand Mr. Heath to mean by saying, "It begins
8 again"?

9 A I mean, at the time, I don't think I
10 really gave that much notice. But now in this
11 context, I assume additional issues.

12 Q Do you see at 10:11, at the bottom of
13 page 0414, Mr. Heath has forwarded to you a legal
14 letter, a screenshot of a legal letter, anyway, that
15 had been received from Ms. Lively's lawyer?

16 A Yes.

17 Q And in it, Ms. Lively's lawyer discusses
18 the complaints of our clients and others?

19 A Uh-huh.

20 Q And do you see there is an attachment
21 that Mr. Heath had sent at 10:12 p.m.?

22 A Yes.

23 Q And that attachment is the protections
24 for return to production document, that is at
25 BALDONI_20416 and 20417?

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1 A Yes.

2 Q Do you recall receiving these 17
3 protections for return to production?

4 A Yes. He texted it to us.

5 Q Do you recall reviewing them at the time?

6 A Yes.

7 Q Did you review all of them?

8 A We had a phone call, and we talked
9 through these.

10 Q And, in fact, there came other points in
11 time later on in the timeline, when you talked about
12 these points with Mr. Heath and Mr. Baldoni, right?

13 A You're going to have to be a little bit
14 more specific.

15 Q This wasn't the last time --
16 November 10th, 2023 was not the last time you
17 looked at this 17-point list, right?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: Correct.

20 BY MR. GOTTLIEB:

21 Q Eventually, you all devised sort of
22 responses or points to address these, should they
23 ever become public, right?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: I believe that we put

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1 "Agreed. It's horrible. We'll dig in
2 for details on her indiscretions."

3 And then there's some emojis there,
4 right?

5 A Yes.

6 Q And you don't respond to that in words,
7 but you "heart" that or "love" that, right?

8 A Yes.

9 Q Did Mr. Mitchell prepare such a whatever,
10 this arsenal of stuff on Ms. Lively's indiscretions?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: Not -- not that I'm aware
13 of.

14 BY MR. GOTTLIEB:

15 Q Who first suggested the hiring of
16 Melissa Nathan and TAG on the Wayfarer -- Baldoni
17 account?

18 A Melissa was one of my crisis
19 recommendations.

20 Q Okay. And I think you testified
21 yesterday that you had given a few names?

22 A Multiple.

23 Q And you -- did you recommend Ms. Nathan?
24 Not in the sense of, you must hire this person, but,
25 this would be a good person to work with, to

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1 your belief that that person could bury Ms. Lively?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: No.

4 BY MR. GOTTLIEB:

5 Q You sure?

6 A Yes.

7 Q Ms. Abel, yesterday you testified that in
8 some point in August of 2017, you were added to a
9 Signal chain; is that right?

10 A Sorry. What was the date?

11 Q At some point in -- did I say 2017?

12 THE STENOGRAPHIC REPORTER: Yeah.

13 BY MR. GOTTLIEB:

14 Q In August of 2024, you were added to a
15 Signal chain with a few people; is that right?

16 A I believe I testified that I think I was,
17 around that time frame. I don't think there was any
18 content in that text chain.

19 Q Okay. And who was -- hold on just a
20 second.

21 Who was -- who was on that text chain to
22 the best of your recollection?

23 A I believe it was -- I would have to --
24 I'd have to go back and refresh my memory.

25 Q Okay. You're not sure as you sit here

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1 today?

2 A I'm not sure.

3 Q Did you -- is it fair to say you didn't
4 use Signal very often?

5 A Correct.

6 Q You didn't open the app very much? It
7 wasn't something you used on a regular daily basis;
8 is that your testimony?

9 MR. FREEDMAN: Objection.

10 THE WITNESS: I believe my testimony
11 yesterday was I had to re-download it because the
12 only time that I used it was when Stephanie
13 introduced me to the app for use on another client.
14 And I had deleted it.

15 BY MR. GOTTLIEB:

16 Q You had deleted it.

17 And in August 20 -- August of 2024, at
18 some point, you reinstalled the app?

19 A I recall doing so, yes.

20 Q And you are on some chain that you don't
21 remember who was on it. And you don't remember
22 really what was sent or not sent?

23 A Correct.

24 Q Did you ever send a message on Signal in
25 August of 2024, to the best of your recollection?

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1 A I don't recall.

2 Q And the thing about that is, we'll never
3 know, right, because Signal is an ephemeral
4 messaging platform?

5 MR. FREEDMAN: Objection.

6 BY MR. GOTTLIEB:

7 Q Do you know what an ephemeral messaging
8 platform is?

9 MR. FREEDMAN: Objection.

10 THE WITNESS: I know the definition of
11 ephemeral messaging, yes.

12 BY MR. GOTTLIEB:

13 Q The messages delete after a certain
14 period of time if you have the settings set a
15 certain way, right?

16 A That is my understanding of how it works.

17 Q Sorry.

18 That's why some people like to use
19 Signal, right?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: Sure.

22 BY MR. GOTTLIEB:

23 Q Because it -- messages delete and,
24 therefore, there's perceived privacy in those
25 communications?

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Amongst other reasons, yes.

3 BY MR. GOTTLIEB:

4 Q Security reasons?

5 A Yes.

6 Q Are you aware that Mr. Wallace was
7 communicating with your colleagues, or colleagues at
8 TAG or others at Wayfarer, using the Signal platform
9 in August of 2024?

10 A I don't recall if I was aware at the
11 time, but I have become aware of that since then.

12 Q Okay. What did you become aware of?

13 A The -- the usage of Signal amongst
14 Jed Wallace and other -- other people.

15 MR. GOTTLIEB: Okay. Let's look at
16 Exhibit 62.

17 (Exhibit 62 marked for identification.)

18 THE WITNESS: Thank you.

19 Q Ms. Abel, you've been handed a document
20 marked JONESWORKS 37247 through 37248, a text chain
21 between you and Stephanie Jones on June 17th,
22 2024.

23 Previously, I asked you if you had
24 recommended the retention of any other individuals
25 in this case because they could bury Ms. Lively.

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1 Q Are you aware of whether she had phone
2 calls with her around this period of time?

3 A I do not know.

4 Q Would you be upset if you learned that
5 Ms. Nathan had been having phone conversations with
6 the editor of the Daily Mail arming them with
7 information about a piece that could be written
8 about Ms. Lively around this time?

9 A No. She's telling me that she's in
10 conversations:

11 (As read):

12 "Off record spoke to the editor at
13 Daily Mail because she's my friend."

14 Q When a reporter gets something off the
15 record, are there different rules that reporter --
16 certain reporters follow for what off the record
17 means or is it uniform across all media?

18 A Off the record is generally uniform.

19 Q Off the record means can't be quoted,
20 right?

21 A Correct.

22 Q Can't be used as a background?

23 A Correct.

24 Q Are there some reporters that take a
25 different view as to whether they can use

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1 off-the-record information to chase leads on
2 stories?

3 A I'm not a reporter. I don't know.

4 Q What is your understanding of when you
5 give something off the record to a reporter? What
6 are they -- what are they allowed to do with that
7 information?

8 MR. FREEDMAN: Objection.

9 BY MR. GOTTLIEB:

10 Q In your understanding.

11 A Sure. I can just speak to my experience.
12 When I give something off the record to a reporter,
13 it is so they have a better understanding of the
14 context. However, they cannot use anything related
15 to that context. It's for comprehension purposes.

16 Q Are they allowed to, for example, if you
17 gave information -- if you gave a link to a reporter
18 off the record, a link to an article or a social
19 media post or whatever, would they be allowed to go
20 read that article or go read the social media post?

21 MR. FREEDMAN: Objection.

22 THE WITNESS: Absolutely. Off the record
23 is for publication purposes.

24 BY MR. GOTTLIEB:

25 Q Okay. I think we understand each other.

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1 "So we can share with him tonight. But
2 he feels good about the call and he
3 feels protected."

4 Do you see that?

5 A Yes.

6 Q A few days earlier, he had told you he
7 didn't feel protected, right?

8 A Yes.

9 Q And at this point, that's changed and he
10 does feel protected?

11 A This is in reference to specific
12 messaging regarding why the cast had unfollowed him
13 and there were no images as he was doing the Today
14 Show the following day.

15 MR. GOTTLIEB: Okay. So this is on
16 August 7th? I'm going to show you another
17 document. This is Exhibit 65.

18 THE WITNESS: Okay.

19 (Exhibit 65 marked for identification.)

20 BY MR. GOTTLIEB:

21 Q This is a one-page document marked
22 HEATH 28187. It has an email from Katie Case that
23 you then forward on August 7th, 2024.

24 A Yes.

25 Q Do you recognize this document?

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1 A I do.

2 Q And this is -- the top email is an email
3 that you send in reply to Ms. Case; is that right?

4 A Yes.

5 Q And at 2:50 p.m. on the 7th, Ms. Case had
6 sent to Mr. Heath and yourself specifics regarding
7 social and digital mitigation or mediation, right?

8 A Yes.

9 Q And she's describing the work that the
10 digital team that Wayfarer was retaining would do,
11 right?

12 MR. FREEDMAN: Objection.

13 THE WITNESS: Yes, this looks like a list
14 of their capabilities.

15 BY MR. GOTTLIEB:

16 Q You see at the top, you're discussing --
17 you have a question about the amount of the fee.
18 And then you have a reference to what we discussed
19 with MN earlier regarding social manipulation.

20 Do you see that?

21 A Yes.

22 Q MN is Ms. Nathan?

23 A Yes.

24 Q And then you say:

25 (As read):

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1 "From the separate team based in
2 Hawaii."

3 Do you see that?

4 A Yes.

5 Q What is the separate team based in
6 Hawaii?

7 A I don't mean to laugh, but we've
8 discussed this and it was either a misunderstanding
9 on my side or I misheard, but I had a conversation
10 with Melissa regarding a digital team that she had
11 worked with, and it was my understanding that they
12 were based in Hawaii.

13 Q Okay. And did you later come to learn
14 that there was no team based in Hawaii?

15 A Yes.

16 Q Was there a separate team?

17 A Yes.

18 Q And that separate team, not in Hawaii,
19 was something that you had discussed regarding
20 social manipulation.

21 Do you see that?

22 A Yes.

23 Q Who was the separate team?

24 A It's my understanding that this was Jed
25 and Streets Relations.

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1 Q What was your understanding of who else
2 worked at Street Relations or with Street Relations
3 other than Jed Wallace?

4 A I had no communications directly with Jed
5 or Street Relations, so I'm not sure.

6 Q You were never on a call with
7 Mr. Wallace?

8 A No, not that I can recall.

9 Q Did you ever meet him?

10 A No.

11 Q You ever on a text chain with him?

12 A I don't think so, no.

13 Q Was it your impression that the specific
14 efforts that are described in the bullet points in
15 Ms. Case's email were services that Mr. Wallace's
16 team was capable of performing?

17 MR. FREEDMAN: Objection.

18 MR. GLOVER: Objection. Form.

19 THE WITNESS: Yes, as I said earlier, it
20 was my understanding this is a list of their
21 capabilities.

22 BY MR. GOTTLIEB:

23 Q Did you think at the time that this was
24 all puffery?

25 A Explain what you mean by "puffery."

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1 MR. FREEDMAN: Objection.

2 BY MR. GOTTLIEB:

3 Q Per this email chain?

4 A Or at any time. It just says "we'll
5 connect with you directly on this."

6 Q Okay. How did you understand Jed and his
7 team to be absolute magicians, if at all?

8 MR. GLOVER: Objection to form.

9 MR. FREEDMAN: Objection.

10 THE WITNESS: It sounds like Katie is
11 hyping them up. I just -- yeah. Make them feel
12 good.

13 BY MR. GOTTLIEB:

14 Q Getting excited about their services?

15 A Sounds like it's just puffery, making
16 them feel good.

17 Q Okay.

18 MR. GOTTLIEB: Ms. Abel, you're being
19 handed --

20 THE STENOGRAPHIC REPORTER: Exhibit 68.

21 (Exhibit 68 marked for identification.)

22 MR. GOTTLIEB: A document that's been
23 marked as Exhibit 68. It's a text chain with the
24 Bates Nos. JONESWORKS 13830 through 13831. This is
25 an August 11th, 2024 text chain involving

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1 yourself, Mr. Heath, and Mitz Toskovic.

2 BY MR. GOTTLIEB:

3 Q Let me know when you've had a chance to
4 look at that.

5 A Yes. Okay.

6 Q Ms. Toskovic is telling you at 6:45 p.m.
7 that Mr. Baldoni is the only one from the cast
8 posting anything at the moment; is that right?

9 A Yes.

10 Q And that:

11 (As read):

12 "Fans are going ham on Blake, Jenny and
13 Colleen's comment sections."

14 Do you see that?

15 A Yes.

16 Q Do you see where he says "Colleen went
17 private from all the hate"?

18 A Yes.

19 Q And -- and she writes that she's worried
20 that:

21 (As read):

22 "Another post from Justin about DV and
23 thanking women everywhere might further
24 fuel the fire."

25 Do you see that?

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1 A Yes.

2 Q And you reply a few minutes later that:

3 (As read):

4 "That's valid thought. But I'm also
5 thinking of the next wave of press for
6 Monday and news cycle and if there is
7 anymore pickup of those articles in a
8 post like this would further combat the
9 negative. Plus, since they're
10 releasing the podcast tomorrow, it
11 further instates that he's in Sweden
12 even though it says in the episode, but
13 people are dumb." Emoji.

14 Do you see that?

15 A Yes, I do.

16 Q And Mr. Heath, after listening or reading
17 this, says "stay the course," right?

18 A Yes.

19 Q So did you understand that Ms. Toskovic
20 was concerned that further posts from Mr. Baldoni
21 could just fuel more hateful messages towards the
22 women in the cast?

23 A I believe she was concerned at the
24 discrepancy, the fact that no one else from the cast
25 was posting and supporting the film, and fans were

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1 viewing that as negative. And Justin was. Justin
2 was incredibly supportive of this film and everyone
3 in it.

4 Q And the result of that negative view that
5 you described is that fans were attacking
6 Ms. Lively, Ms. Slate, and Ms. Hoover on social
7 media, right?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: Social media was attacking
10 everyone, specifically resulting from people's
11 actions during the promotion of this tour.

12 BY MR. GOTTLIEB:

13 Q My question was just about --

14 A Sure.

15 Q -- what you understood Ms. Toskovic to be
16 communicating to you. And what she says is that
17 "fans are going ham on Blake, Jenny and Colleen's
18 comment section." Right?

19 A Yes.

20 MR. FREEDMAN: Objection.

21 BY MR. GOTTLIEB:

22 Q So you understood at this point in time,
23 that the hate or the negative reaction -- or
24 Ms. Toskovic describes it as hate -- is being
25 directed not just at Ms. Lively, but also at

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1 Ms. Slate and Ms. Hoover, right?

2 A Yes. And the hate was resulting from
3 their participation in the promotion of the -- of
4 the film.

5 MR. GOTTLIEB: Move to strike as
6 nonresponsive.

7 BY MR. GOTTLIEB:

8 Q Ms. Abel, I didn't ask you for why you
9 thought -- or how you thought the hate arose.

10 A Oh, sorry. I was clarifying what the
11 hate was. Sorry.

12 Q You understood that there was hate online
13 directed at Ms. Lively, Ms. Slate, and Ms. Hoover,
14 right?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: Yes.

17 BY MR. GOTTLIEB:

18 Q And what Ms. Toskovic is saying here is:

19 (As read) :

20 "Maybe we should hold off further posts
21 about domestic violence for Justin
22 because I'm concerned that that might
23 fuel the fire that we're already
24 seeing."

25 A Yes, because --

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1 Q And you --

2 A Let me finish, please. Because Blake,
3 Jenny and Colleen were not posting anything or
4 communicating anything regarding the domestic
5 violence community.

6 Q And you and Mr. Heath say "stay the
7 course," right?

8 A Yes.

9 MR. GOTTLIEB: Ms. Abel, I'm handing you
10 what has been marked as Exhibit 69. This is a text
11 chain between you and Ms. Nathan on August 12th,
12 2024, starting at 2:14 p.m., ending at 11:56 p.m.
13 Bears the Bates No. NATHAN 2151 through NATHAN 2156.

14 (Exhibit 69 marked for identification.)

15 THE WITNESS: Okay.

16 BY MR. GOTTLIEB:

17 Q So Ms. Abel, this is a text exchange
18 between you and Ms. Nathan on August 12th, 2024?

19 A Yes.

20 Q And in it, you discuss information that
21 you received on a call with Mr. Heath; is that
22 right? A meeting or Zoom or some type of
23 interaction with Mr. Heath?

24 A I'm on with Jamey. Yes, I must have
25 been. Yes.

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1 THE WITNESS: No, I believe that was a
2 continuation of the recommendation that was
3 requested earlier. And I had clearly brought -- I
4 asked for Melissa's opinion. I don't think that was
5 the --

6 BY MR. GOTTLIEB:

7 Q Ms. Abel?

8 A Yes.

9 Q You say at 10:32 p.m., in response to
10 Ms. Nathan saying "can he please hire a lawyer," you
11 say:

12 (As read):

13 "He needs to. He has one but he needs
14 a litigator."

15 A Right. But I don't think that was the
16 impetus. I'm sorry. I'm just trying to respond to
17 your question.

18 Q Okay. All I'm asking is: Following your
19 learning about the request to put out a statement,
20 you and Ms. Nathan immediately say that your client,
21 Mr. Baldoni and Wayfarer, needs to hire a litigator.
22 You both agree on that, right?

23 A Yeah.

24 Q Okay. And then at 11:42 p.m., Ms. Nathan
25 says:

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1 (As read) :

2 "Can I start a Signal thread with you,
3 me, and Jed just in case you need him
4 to connect you to Bryan because they
5 are very close?"

6 Do you see that?

7 A Yes.

8 Q Does that refresh your recollection as to
9 who the Signal thread you were on was with in August
10 of 2024?

11 A Yes. But, again, I don't know if one was
12 actually started. So I -- I would have to refresh
13 my memory on that.

14 Q Okay. And on the next page 2156,
15 Ms. Nathan says "Definitely contact him on" --
16 sorry, to have context for that. At 11:43 p.m. on
17 the previous page, you say:

18 (As read) :

19 "I can reach out to Bryan too. We've
20 worked together."

21 Right?

22 A Yes.

23 Q And that's referring to Mr. Freedman?

24 A Sorry. I'm on the wrong page.

25 Yes.

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1 Q Okay. And then at 11:44 p.m., Ms. Nathan
2 says:

3 (As read):

4 "Definitely contact him on Signal
5 though."

6 Do you see that?

7 A Yes.

8 Q She says:

9 (As read)

10 "Feel free to add me obviously because
11 of the crisis."

12 So Ms. Nathan is telling you definitely
13 connect with Mr. Freedman on Signal.

14 Do you see that?

15 A Yes.

16 Q And, again, Mr. Freedman is not your
17 lawyer at this point in time; is that right?

18 A That is correct.

19 Q Did you think it was strange that you
20 were being directed to contact an attorney on
21 Signal?

22 A No.

23 Q Is that something you've been asked to do
24 before? Contact an attorney on Signal?

25 A I don't recall, no.

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1 THE WITNESS: Yes.

2 BY MR. GOTTLIEB:

3 Q All I'm asking, Ms. Abel, is you didn't
4 tell anyone, don't look at my Signal messages,
5 right?

6 A No.

7 Q Okay. So if you had them, presumably --
8 and they were responsive, they would have been
9 produced to us, right?

10 MR. FREEDMAN: Objection.

11 THE WITNESS: I believe so, yes.

12 BY MR. GOTTLIEB:

13 Q And, again, Signal is a messaging
14 platform where messages delete after a certain
15 period of time, right?

16 MR. FREEDMAN: Objection.

17 THE WITNESS: Yes.

18 MR. GOTTLIEB: Handing you what's been
19 marked as Exhibit 70.

20 (Exhibit 70 marked for identification.)

21 BY MR. GOTTLIEB:

22 Q This is a document bearing the Bates Nos.
23 JONESWORKS 14019 through 14029.

24 And, Ms. Abel, I'm only going to be
25 asking you about questions starting with messages on

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1 BY MR. GOTTLIEB:

2 Q Okay. So other than what you've
3 discussed with your counsel, you do not have an
4 understanding of how Mr. Reynolds extorted you?

5 A Again, I'm hesitant to speak to something
6 that might be privileged. So...

7 Q Okay. I'm asking you, other than the
8 conversations you had with your lawyers, do you know
9 anything, as you sit here today, about how it is
10 that Mr. Reynolds extorted you?

11 MR. FREEDMAN: And, again, I'll instruct
12 you not to answer anything that's attorney-client
13 privilege, anything that we've discussed.

14 THE WITNESS: I -- I -- it falls under
15 this.

16 BY MR. GOTTLIEB:

17 Q And I will ask you the same question
18 about Ms. Lively. How did Ms. Lively extort you?

19 MR. FREEDMAN: Same instruction.

20 THE WITNESS: I believe it's under the
21 same provision.

22 BY MR. GOTTLIEB:

23 Q You sued both Ms. Lively and Mr. Reynolds
24 for defamation; is that right?

25 A Yes.

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1 A Outside of what I discussed with my
2 lawyers and been made aware of with my lawyers, I
3 believe that is one of the things that he has
4 participated in. In addition to the correspondence
5 and such that we have -- that's been made available
6 to me and during this discovery.

7 Q All right. Ms. Abel, as a pure factual
8 matter, are you aware of any statement that
9 Ryan Reynolds has ever -- a statement, something he
10 said, ever, about you?

11 MR. FREEDMAN: Again, I will instruct you
12 not to answer as to the content of that statement.
13 You can say yes or no, but not what you've learned
14 from counsel.

15 THE WITNESS: It's hard to answer it
16 based on what we've learned from counsel.

17 MR. FREEDMAN: Again, if you've gotten
18 that information as a result of discovery in this
19 case from me and that we've discussed this or any
20 other lawyer --

21 THE WITNESS: Uh-huh.

22 MR. FREEDMAN: -- I will instruct you not
23 to answer.

24 THE WITNESS: Okay. I cannot answer.
25

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1 BY MR. GOTTLIEB:

2 Q Okay. So I -- for the purposes of having
3 a clear record --

4 A Uh-huh.

5 Q -- other than what you may have learned
6 in conversations with your lawyers, you cannot
7 identify for me any statement that Mr. Reynolds has
8 ever made about you; is that right?

9 MR. FREEDMAN: Same instruction.

10 THE WITNESS: Outside of what I've
11 learned from my lawyers, I can't recall a statement
12 that he has made about me personally, publicly.

13 BY MR. GOTTLIEB:

14 Q You sued Ms. Lively and Mr. Reynolds for
15 intentional interference with contractual relations;
16 is that correct?

17 A Yes.

18 Q What contract that you're aware of did
19 Mr. Reynolds -- of yours -- did Mr. Reynolds
20 interfere with?

21 MR. FREEDMAN: Same instruction.

22 THE WITNESS: I'm not able to answer that
23 without divulging privileged communications.

24 BY MR. GOTTLIEB:

25 Q Let me try this another way.

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1 A Sure.

2 Q Have you ever had a contract with
3 Ryan Reynolds?

4 A With Ryan Reynolds, no.

5 Q Have you ever had a contract with
6 Ms. Lively?

7 A No.

8 Q Okay. As you sit here today, are you
9 aware of any contract that you have ever had with
10 anyone that Mr. Reynolds or Ms. Lively interfered
11 with?

12 MR. FREEDMAN: That's just a yes or a no.
13 Otherwise, I'll instruct you not to answer what
14 we've discussed.

15 THE WITNESS: I'm not able to answer that
16 without divulging attorney privileged
17 communications.

18 BY MR. GOTTLIEB:

19 Q Ms. Abel, you have -- I'm going to talk a
20 little about your communications devices and
21 practices.

22 How many email accounts did you -- have
23 you used between, let's call it January of 2024 to
24 the present? Can you list the email accounts that
25 you've used?

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1 your email accounts?

2 A I -- I don't -- I don't know.

3 Q Do you know, for example, whether your
4 RWA email account deletes information after a
5 certain period of time?

6 A I do not know.

7 Q Did you ever, at any point, go check
8 whether the RWA account has an auto delete feature
9 on it?

10 A I don't believe it does, but I did not
11 specifically check.

12 Q Did you ever receive an instruction to
13 discontinue any deletion, auto delete functions that
14 might exist on your accounts?

15 MR. FREEDMAN: Objection. I will
16 instruct you not to answer as to any communications
17 you had with counsel. Other than counsel, did you
18 get an instruction from someone?

19 THE WITNESS: No.

20 BY MR. GOTTLIEB:

21 Q Did you come to understand at any time,
22 Ms. Abel, that you had an obligation to preserve
23 documents relating to the dispute between Ms. Lively
24 and Mr. Baldoni?

25 MR. FREEDMAN: Same instruction as it

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1 will invade the attorney-client privilege. So even
2 if you're going to say yes to that, that's going to
3 invade the attorney-client privilege. So you're not
4 going to -- I'm going to instruct her not to answer.

5 MR. GOTTLIEB: About the simple fact of
6 whether she knew she was required to preserve
7 documents?

8 MR. FREEDMAN: Yeah, because the simple
9 fact is revealing the actual privileged
10 communication.

11 MR. GOTTLIEB: Okay.

12 BY MR. GOTTLIEB:

13 Q So are you going to follow your counsel's
14 instruction?

15 A Yes, I'm going to follow my counsel's
16 instruction.

17 Q Okay.

18 Other than the Signal thread that you --
19 that we talked about earlier in August, between
20 August and December of 2024, can you think of any
21 other Signal thread or Signal communications that
22 you sent or received to anyone about anything?

23 A Not that I can recall, no.

24 Q Okay. Have you had Signal communications
25 since December of 2024?

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1 A December 2024 until now?

2 Q Yes.

3 A Yes.

4 Q And how many different Signal chains or
5 threads do you have going at any one time now?

6 A I -- I don't recall. I don't know.

7 Q Have those Signal communications included
8 communications about the issues in this case?

9 A To clarify, I have with my attorneys.

10 Q Okay. Have any of those communications
11 been about the press?

12 A I don't recall.

13 Q Have you communicated with Mr. Wallace on
14 Signal at any time from December of 2024 to the
15 present?

16 A With inclusion of my attorneys.

17 Q So the answer is yes?

18 A Yes. With inclusion of my attorneys.

19 Q Okay. Have you communicated with
20 Mr. Wallace outside of any threads including your
21 attorneys?

22 A Not that I can recall.

23 Q Have -- since the lawsuit was filed, have
24 you taken any steps -- not talking about any
25 conversations or advice you have received -- but

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1 have you taken any steps personally to ensure that
2 your communications are preserved?

3 MR. FREEDMAN: Other than what you've
4 learned from counsel, you can answer, if you've
5 taken steps outside of what we discussed.

6 THE WITNESS: I've produced documents as
7 requested.

8 MR. GOTTLIEB: Mr. Freedman, she can
9 testify about what she's done, even if she's
10 discussed what she's done with you. That's clearly
11 not privileged.

12 BY MR. GOTTLIEB:

13 Q And so my question is: Can you think of
14 anything that you have done -- I don't want to know
15 about what you talked to your lawyers about. But
16 can you think of anything you have done, any steps
17 you have taken outside of conversations you've had
18 with counsel, but actual things you've done to
19 preserve your documents, your electronic
20 communications in this case?

21 A Yes. And I apologize, I thought I
22 answered. I've produced everything as requested.

23 Q Okay. So my question is a little bit
24 different. So --

25 A Okay.

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1 Q -- I understand you're saying you
2 produced what you found. My question is: At any
3 point in time, do you have a recollection of taking
4 steps to ensure that nothing would be deleted, no
5 auto delete functions would be on, no messages would
6 expire from a set period of time or the like,
7 anything like that?

8 MR. FREEDMAN: Same instruction as to
9 attorney-client privilege. If you can answer it
10 outside of that, you can answer it.

11 THE WITNESS: Yeah, I don't think I can
12 answer it.

13 BY MR. GOTTLIEB:

14 Q Are you aware that you have produced four
15 Signal communications to us in this case?

16 MR. FREEDMAN: Again, if you're aware of
17 it based on something you learned from counsel, I
18 would like you not to provide that information. If
19 you're aware of it some other way, you can answer.

20 THE WITNESS: I'm not aware of it any
21 other way.

22 BY MR. GOTTLIEB:

23 Q Do you know that there are Signal
24 communications that you have been copied on that
25 have been produced to us in this case that you have

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1 not produced to us in this case?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: No.

4 BY MR. GOTTLIEB:

5 Q Did you have Signal communications with
6 Sage Steele in early January of 2025?

7 A I don't recall by Signal.

8 Q But you had some communications that you
9 recall with Sage Steele in early January 2025?

10 A Yes, I -- I recall Sage had reached out
11 to us. She -- this case personally resonated with
12 her. I believe she had a brother who was falsely
13 accused, and she expressed interest in wanting to
14 support in our defense.

15 Q And do you know that you had Signal
16 communications with Ms. Koslow and Ms. Nathan in
17 January of 2025 that did not include your attorneys?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: In -- in January? I don't
20 recall.

21 BY MR. GOTTLIEB:

22 Q Okay. But your testimony is you've
23 produced to us everything that could be found in
24 your phone that was responsive to our request,
25 right?

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1 "Wasn't his story."

2 Meaning James.

3 (As read):

4 "No it's not his name. Fuck ours is
5 way better."

6 Do you see that?

7 A Yes.

8 Q Meaning, our story that Ms. Nathan is
9 communicating?

10 A Again, it could be one that she
11 contributed to, meaning, we were getting incoming
12 commentary, asking for commentary. We were
13 balancing stories left and right.

14 Q You really were not told that TAG was
15 placing a story with The Daily Mail?

16 A No, I was not. And, actually, I would
17 like to add to that, that not only were we not told,
18 we were given explicit instructions from our client
19 to not place any story that was negative about Blake
20 or otherwise. Our main focus was to mitigate the
21 negative press that was breaking, organically, from
22 the press tour.

23 Q Ms. Abel, on the next page with 5:20, at
24 the top, do you see a text message between
25 Ms. Nathan and James Vituscka?

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REPORTER'S CERTIFICATE

I, ASHLEY SOEVYN, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was put under oath by me;

That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That a review of the transcript by the deponent was/ was not requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 27th day of September, 2025.



ASHLEY SOEVYN

CSR No. 12019