

October 09, 2025

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,)
PLAINTIFF,) CASE NO.
VS.) 1:24-CV-10049-LJL
(CONSOLIDATED WITH
1:25-CV-00449-LJL
WAYFARER STUDIOS LLC,)
JUSTIN BALDONI, JAMEY)
HEATH, STEVE SAROWITZ,)
IT ENDS WITH US MOVIE)
LLC, MELISSA NATHAN,)
THE AGENCY GROUP PR)
LLC, JENNIFER ABEL, JED)
WALLACE, AND STREET)
RELATIONS INC.,)
DEFENDANTS.)

JENNIFER ABEL,)
THIRD-PARTY)
PLAINTIFF,)
VS.)
JONESWORKS LLC,)
THIRD-PARTY)
DEFENDANT.)

WAYFARER STUDIOS LLC,)
JUSTIN BALDONI, JAMEY)
HEATH, IT ENDS WITH US)
MOVIE LLC, MELISSA)
NATHAN, JENNIFER ABEL,)
AND STEVE SAROWITZ,)
CONSOLIDATED)
PLAINTIFFS,)

VS.)
BLAKE LIVELY, RYAN)
REYNOLDS, LESLIE)
SLOANE, VISION PR,)
INC., AND THE NEW YORK)
TIMES COMPANY,)
CONSOLIDATED)
DEFENDANTS.)

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1 ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE

OCTOBER 9, 2025

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3
4 ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE,
5 produced as a witness at the instance of the Blake
6 Lively and duly sworn, was taken in the above styled and
7 numbered cause on Thursday, October 9, 2025, from 9:14
8 a.m. to 7:36 p.m., before Janalyn Elkins, CSR, in and
9 for the State of Texas, reported by computerized
10 stenotype machine, at the offices of Jackson Walker, 100
11 Congress Avenue, Suite 1100, Austin, Texas, pursuant to
12 the Federal Rules of Civil Procedure and any provisions
13 stated on the record herein.
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1 about services on email?

2 A. Not that I recall.

3 Q. How about on text message?

4 A. Not -- could you be more specific?

5 Q. On any form of electronic communication? Let's
6 broaden it up.

7 A. And the question did I have any communication
8 with her about any types of services?

9 Q. That you might provide to Wayfarer Studios?

10 A. Yeah, we discussed monitoring.

11 Q. Okay. In what -- on what platform did you have
12 that conversation with Ms. Nathan?

13 A. I -- I -- I wouldn't know because I didn't know
14 the client or the details yet.

15 Q. Were you in -- I'm not talk -- sorry. Maybe my
16 question was unclear. I wasn't talking about what
17 platform for monitoring. I was talking about the
18 platform that you used to communicate with Ms. Nathan
19 about that. Was it Signal?

20 A. We've communicated through Signal and phone
21 calls.

22 Q. By August 8th, 2024, had you communicated with
23 Melissa -- Melissa Nathan on Signal?

24 A. Related to this?

25 Q. On anything?

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1 A. Oh, yes.

2 Q. Okay. Did you also communicate with Ms. Nathan
3 on the -- do you -- do you have an Apple iPhone?

4 A. I do.

5 Q. Okay. Did you also communicate with Ms. Nathan
6 as of August 8th, 2024 on the Apple messaging app, the
7 iMessaging app?

8 A. Ever before?

9 Q. Yes.

10 A. I believe so.

11 Q. Would you say as between those two messaging
12 applications as of August 8th, 2024, with respect to
13 your communications with Melissa Nathan, you used one of
14 those applications more than the other?

15 A. I -- I would say yes, Signal.

16 Q. You used Signal more?

17 A. Uh-huh.

18 Q. When do you recall -- do you -- do you recall a
19 point in time when you started to use Signal more than
20 regular text messaging with Melissa Nathan?

21 A. No.

22 Q. Okay. At some point in time you did, though?

23 A. No, I need a more specific question.

24 Q. Okay. Do you see, back to the email,
25 Ms. Nathan says, (Reading:) He is aware we're going for

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1 Q. Well, you say in the email, (Reading:) This
2 was forwarded without attachments.

3 Right?

4 A. I do say that, but I don't recall.

5 Q. And -- okay. And you say, (Reading:) This is
6 exactly the kind of content (in theory, until I read
7 them) that our team can elevate.

8 Right?

9 A. I do say that.

10 Q. So you seem to be saying, and correct me if I'm
11 wrong, but you seem to be saying that whatever this
12 attachment or article was, you hadn't read it yet?

13 A. I -- I can't speak to that. I'm not sure.

14 Q. You don't remember if that's what you're saying
15 here?

16 A. I don't remember, no.

17 Q. Well, nonetheless, whether you had read the
18 article or not, you say, (Reading:) This is exactly the
19 kind of content that our team can elevate across all
20 algorithmically driven platforms.

21 Correct?

22 A. Yes.

23 Q. Was your team capable of elevating content
24 across algorithmically driven platforms?

25 A. I don't have a team.

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1 Q. Is Street Relations capable of elevating
2 content across all algorithmically driven platforms?

3 A. Absolutely not.

4 Q. So you were being untruthful to [REDACTED]
5 when you said that "our team can elevate across all
6 algorithmically driven platforms"?

7 MR. COOLEY: Objection.

8 THE WITNESS: Yeah, not at all.

9 Q. (BY MR. GOTTLIEB) You were not at all being
10 untruthful?

11 A. No.

12 Q. Okay. So Street Relations can't do that,
13 right?

14 A. Correct.

15 Q. Okay. So who was your team capable of
16 elevating across all algorithmically driven platforms?

17 A. If I'm referencing TAG, it would be whomever
18 works for TAG to post stories.

19 Q. And you're saying you have no memory at all of
20 what team you were referencing here?

21 A. No, I -- I think I said I'm referencing TAG as
22 the team.

23 Q. Okay. So you think that TAG is capable of
24 elevating content across all algorithmically driven
25 platforms?

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1 A. 100 percent.

2 Q. Okay. Who at TAG can do that?

3 MR. COOLEY: Objection.

4 THE WITNESS: To be specific, when you post
5 a story or find a place for a story, you are elevating
6 it across algorithmically driven platforms.

7 Q. (BY MR. GOTTLIEB) And so who at TAG was
8 capable of posting or sharing stories creating content?

9 MR. COOLEY: Same.

10 THE WITNESS: I don't know specifically.
11 That's their job, to create stories.

12 Q. (BY MR. GOTTLIEB) TAG's job is to create
13 stories?

14 A. Yes. Or -- let me be specific with that. Is
15 to help their clients get things posted as news stories,
16 which would 100 percent elevate it across all
17 algorithmically driven platforms.

18 Q. Okay. And -- and so you believe that when you
19 were writing, (Reading:) So I can share with the teams
20 and get it into the system, what you're talking about is
21 sharing the content with TAG?

22 A. I do.

23 Q. And you believe the system is a reference to
24 something that TAG has?

25 A. It's the system of posting or at least getting

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1 content covered for their clients.

2 Q. Okay. And you recall the previous exhibit we
3 looked at was on the 19th?

4 A. Uh-huh.

5 Q. At 7:29 p.m., and you said, (Reading:) Got
6 that one in the system/on it?

7 A. Correct.

8 Q. So does it look like you followed through on
9 what you said you would do here in Exhibit 10?

10 A. I don't recall what that is.

11 Q. Was this further help for [REDACTED]?

12 A. No. I didn't -- again, not engaged by [REDACTED]

13 [REDACTED]

14 Q. Well, sir, that was not my question. My
15 question was, was this further help for [REDACTED] that
16 you provided?

17 MR. COOLEY: Objection.

18 THE WITNESS: I can't answer that. I don't
19 know.

20 Q. (BY MR. GOTTLIEB) Why? Why can't you answer
21 that?

22 MR. COOLEY: Objection.

23 MR. BABCOCK: Same -- same objection.

24 THE WITNESS: I don't know if it helped
25 him.

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1 Q. (BY MR. GOTTLIEB) Did you believe you were
2 providing him with help?

3 A. No.

4 Q. It's a very simple question -- no?

5 A. I believe that I was helping to share
6 information.

7 Q. Is that not providing help?

8 A. It is.

9 Q. Okay. So if I want to ask you about whether
10 you were formally engaged by someone from this point
11 forward, I will be sure to ask formally engaged and
12 specify my question. But can we agree if I ask you if
13 you have helped someone, we're using the broad
14 definition of help in any respect?

15 MR. BABCOCK: Objection.

16 MR. COOLEY: Join.

17 MR. BABCOCK: You don't need to make an
18 agreement about that.

19 Q. (BY MR. GOTTLIEB) This is 11.

20 (Exhibit No. 11 was marked.)

21 Q. (BY MR. GOTTLIEB) Exhibit 11, sir, is a
22 document bearing the Bates Nos. 3.0486 through .0488.
23 This is a text chain. The date range is November 11th
24 through November 14th, 2024. Appears to be between
25 yourself, Ms. Nathan, Ms. Koslow, [REDACTED], and

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1 VIDEOPHOTOGRAPHER: Going off the record. The
2 time is 12:29.

3 (Brief recess.)

4 VIDEOPHOTOGRAPHER: Back on the record. The
5 time is 1:34.

6 Q. (BY MR. GOTTLIEB) Hi, Mr. Wallace, back on the
7 record. Hope you had a good lunch.

8 We were talking before about a period of
9 time in October through November of 2024. We were
10 looking at a bunch of messages. I think I asked you
11 before about sort of, like, the recordkeeping that you
12 have or that Street has for your work. If we wanted to
13 recreate one of your days in that period of time after
14 the fact, say, you know, mid-October, end of
15 October 2024, would you have anything in terms of
16 records other than, you know, your text messages,
17 emails, and phone records?

18 A. Would I have anything other as records? Is
19 that what you're asking? I'm sorry.

20 Q. Any information that you would have stored
21 somewhere that would help us to recreate one of your
22 days going back in time other than your -- what -- what
23 is -- you have preserved in the form of text messages,
24 whether Signal or Apple, emails, and phone records that
25 show outgoing and incoming calls?

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1 A. No.

2 Q. Do you keep --

3 A. Not that I'm aware of.

4 Q. I'm sorry.

5 A. Not that I'm aware of.

6 Q. Okay. Do you keep a calendar?

7 A. Yeah. There's -- there's a calendar of events.

8 Q. You -- you have a calendar personally?

9 A. Yeah. I mean, everyone has I on an iPhone.

10 Q. Okay. Do you ever put work calls or work
11 meetings into your calendar on your iPhone?

12 A. Yes.

13 Q. Okay. And if you get invited to a Zoom or a
14 Microsoft Teams meeting or something like that, that
15 from time to time show up in your calendar on your
16 iPhone?

17 MR. BABCOCK: Objection.

18 THE WITNESS: Yeah. If -- if someone sent
19 me a link to that, you know, it just populates
20 sometimes. You accept or deny.

21 Q. (BY MR. GOTTLIEB) All right. So sometimes you
22 will have a -- depending on whether somebody sent you
23 the invite to your -- your email or your -- otherwise
24 sent you an invite that populates into your calendar?

25 A. I need to know more details.

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1 a conversation in advance of her sending this message at
2 8:57 a.m.?

3 MR. BABCOCK: Objection.

4 MR. COOLEY: Join.

5 THE WITNESS: I don't recall.

6 Q. (BY MR. GOTTLIEB) Is it possible that before
7 Ms. Nathan sent this statement of work at 8:57 a.m. that
8 you and she discussed this statement of work?

9 MR. BABCOCK: Objection.

10 THE WITNESS: Yeah, I don't recall.

11 Q. (BY MR. GOTTLIEB) My question is just is it
12 possible?

13 MR. BABCOCK: Objection. Sorry.

14 Q. (BY MR. GOTTLIEB) So -- that's a -- that's a
15 yes or no --

16 MR. COOLEY: Join.

17 Q. (BY MR. GOTTLIEB) -- question?

18 A. Yeah, I don't think so.

19 Q. You don't think so. But do you know for
20 certain that you and Melissa Nathan did not discuss the
21 statement of work before she sent it at 8:57 a.m.?

22 MR. BABCOCK: Objection.

23 MR. COOLEY: Join.

24 THE WITNESS: We did not discuss the
25 statement of work before she sent that.

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1 Q. (BY MR. GOTTLIEB) You're certain of that as
2 you sit here today?

3 A. As I recall.

4 Q. Okay. That's a different answer. So saying to
5 the best of my recollection I don't recall discussing
6 this is one answer. Saying that you're certain is
7 another. So I'm just trying to discern the difference
8 to understand your testimony?

9 A. We didn't have a discussion about the scope of
10 work.

11 Q. Okay. And you're sure about that?

12 A. I'm sure about that.

13 Q. All right. Did you discuss it with her after
14 she sent it?

15 A. I don't recall.

16 Q. Okay. So you might have discussed it with her
17 after, but you're sure you didn't discuss it with her
18 before?

19 A. Yeah, I don't recall.

20 Q. Do you see the next bullet down says,
21 (Reading:) Use our team of specialists to build all the
22 digital (Reddit, site, X, 4 Chan, discord, et cetera)
23 messaging to trend and dominate in client's favor?

24 A. I do.

25 Q. Are you aware of any team of specialists that

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1 exists that can do that?

2 A. I'm not.

3 Q. Is Melissa Nathan a technically sophisticated
4 person?

5 MR. COOLEY: Objection.

6 MR. BABCOCK: Objection.

7 THE WITNESS: Yeah, I'd -- I'd need a more
8 specific question.

9 Q. (BY MR. GOTTLIEB) Do you think Melissa Nathan
10 understands, for example, the -- the concept of
11 something being algorithmically weaponized?

12 MR. BABCOCK: Objection.

13 MR. COOLEY: Join.

14 THE WITNESS: I don't know.

15 Q. (BY MR. GOTTLIEB) Do you think she understands
16 how to influence content on 4chan?

17 MR. BABCOCK: Objection.

18 MR. COOLEY: Objection.

19 THE WITNESS: I don't know.

20 Q. (BY MR. GOTTLIEB) Would it surprise you to
21 learn in her testimony under oath in this case she
22 testified that she doesn't even have social media?

23 MR. BABCOCK: Objection.

24 THE WITNESS: I -- I -- I don't -- I
25 don't -- have no idea if that would surprise me or not.

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1 It would be news.

2 Q. (BY MR. GOTTLIEB) Okay. But your testimony is
3 you don't know anyone who could build all of the digital
4 messaging from these platforms to trend and dominate in
5 the client's favor; is that right?

6 MR. COOLEY: Objection.

7 THE WITNESS: Correct.

8 Q. (BY MR. GOTTLIEB) And you can't do that
9 personally?

10 A. I cannot.

11 Q. Okay. So assuming that Melissa Nathan is also
12 not capable of doing this personally, given your
13 testimony that you can't do it personally and you don't
14 know anybody who can do this personally, is this a
15 truthful representation of the statement of work that
16 you, TAG, and Bryan Freedman could provide?

17 MR. BABCOCK: Objection.

18 MR. COOLEY: Objection.

19 THE WITNESS: I -- I have no idea what some
20 of these things are.

21 Q. (BY MR. GOTTLIEB) So -- so no, this would not
22 be a truthful and accurate representation of a service
23 that collectively, you, Melissa Nathan, and Bryan
24 Freedman could provide?

25 MR. BABCOCK: Objection.

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1 MR. COOLEY: Objection.

2 THE WITNESS: Not from my perspective.

3 Q. (BY MR. GOTTLIEB) Why do you think Melissa
4 Nathan repeatedly sends out statements of work that
5 represent digital services that you can't provide?

6 MR. BABCOCK: Objection.

7 MR. COOLEY: Objection.

8 THE WITNESS: Can you repeat that question?

9 Q. (BY MR. GOTTLIEB) Why do you think Melissa
10 Nathan repeatedly sends out statements of work to
11 clients referencing digital services that you are not
12 capable of providing?

13 MR. BABCOCK: Objection.

14 MR. COOLEY: Same.

15 THE WITNESS: I have no idea.

16 Q. (BY MR. GOTTLIEB) Does it concern you?

17 MR. BABCOCK: Objection.

18 THE WITNESS: I -- I don't know enough
19 about it --

20 Q. (BY MR. GOTTLIEB) As you sit here today --

21 A. -- that it concerns me.

22 Q. Sorry. I didn't mean to interrupt.

23 As you sit here today, we've now looked at
24 a few of these, right?

25 A. Uh-huh.

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1 Q. Okay. And I'm just asking you as a businessman
2 who runs his own business, who has a representation,
3 does it bother you at all that you are being held out to
4 provide services that you are sitting here telling me
5 under oath not only can you not provide them you don't
6 even know what they are?

7 MR. BABCOCK: Objection.

8 MR. COOLEY: Objection.

9 Q. (BY MR. GOTTLIEB) Does that bother you?

10 MR. BABCOCK: Same objection.

11 MR. COOLEY: Objection.

12 THE WITNESS: I don't know that she's
13 talking about me.

14 Q. (BY MR. GOTTLIEB) Okay. If she's talking
15 about you, if her testimony is in providing description
16 of digital services she was talking about you and Street
17 Relations, then would it bother you?

18 MR. BABCOCK: Objection.

19 MR. COOLEY: Objection.

20 THE WITNESS: I don't have enough details
21 there.

22 Q. (BY MR. GOTTLIEB) Would you want to keep
23 working with somebody who's making misrepresentations to
24 clients about what you can do?

25 MR. COOLEY: Objection.

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1 (Exhibit No. 18 was marked.)

2 Q. (BY MR. GOTTLIEB) This is Exhibit 18. And
3 Mr. Wallace, you've been handed a document marked as
4 Exhibit 18 bearing the Bates Nos. Street 3.0348 through
5 0355. And let me know once you've had a chance to look
6 through it.

7 A. Okay.

8 Q. You've had a chance to look through Exhibit 18?

9 A. I have.

10 Q. And Exhibit 18 is an email exchange be an
11 attachment that involves you, a number of people from
12 TAG, and someone from [REDACTED]; is that right?

13 A. Yes.

14 Q. Is [REDACTED] a client that you did any work
15 for around this time?

16 A. They were a client of TAG's.

17 Q. Okay. A client of TAG's. Did you or Street do
18 any work for them in connection with TAG's services?

19 A. I had a few consulting calls with them.

20 Q. Okay. And this August -- this is August 3rd,
21 2024. Is that around the same time that you began
22 working for -- performing the work that you did on
23 behalf of Wayfarer Studios?

24 A. No. It was later for Wayfarer.

25 Q. A few days later?

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Some Redactions unsealed

1 A. August 9th.

2 Q. This was around the same time that you began
3 talking to Ms. Nathan about Mr. Baldoni and Wayfarer; is
4 that right?

5 A. I don't recall.

6 Q. Okay. At most, then, I think what you're
7 saying it was six days apart from when you were engaged?

8 A. According to this date, yes.

9 Q. Okay. And there is a scope of work for
10 [REDACTED] that is attached to the end of this email
11 chain; is that right?

12 A. Yes.

13 Q. And [REDACTED]
14 [REDACTED] is the first person to send an email -- oh,
15 lost your microphone.

16 A. My bad.

17 Q. No worries.

18 Am I right that [REDACTED]

19 [REDACTED] is the
20 person who introduces or connects you with [REDACTED]

21 [REDACTED]?

22 A. Yes.

23 Q. Okay. And at 8:28 p.m. on Friday, August 2nd,
24 you reply to the introduction that [REDACTED] has sent;
25 is that right?

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1 A. Yes.

2 Q. [REDACTED]

3 [REDACTED]

4 [REDACTED] I'm sorry for
5 the circumstances but happy to connect and help build a
6 solution.

7 Do you see that?

8 A. I do.

9 Q. And you say, (Reading:) I see the date of the
10 article and have my forensic team building a quick
11 report on the sentiment and how it engages so we can
12 discuss all the paths to solve.

13 Do you see that?

14 A. I do see.

15 Q. Who is your forensic team you were referring to
16 here?

17 A. I don't have one.

18 Q. Who were you referring to when you wrote "my
19 forensic team"?

20 A. I don't recall.

21 Q. Do you think you had someone out there that was
22 building a quick report on the sentiment?

23 A. No, not at this point.

24 Q. Do you think you asked anyone whether human,
25 AI, or otherwise to build a sentiment report at this

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1 point in time?

2 A. I did not.

3 Q. So this was a misrepresentation that you made
4 to [REDACTED]

5 A. It was forward thinking before I looked into
6 the case.

7 Q. I'm not sure I understand what you're saying?

8 A. I hadn't had a chance to review. I was going
9 to review myself first.

10 Q. Okay. So you didn't yet have anyone building a
11 quick report. But what you're telling me, I think, is
12 that your intention was to prepare some kind of a
13 sentiment report?

14 A. I don't know enough details. I don't recall.

15 Q. Okay. But you certainly recall that it was not
16 correct that you had a forensic team at that time
17 building a quick report on the sentiment?

18 A. Correct.

19 Q. Then you ask if you can connect on Monday,
20 right?

21 A. Yes.

22 Q. Then you say, (Reading:) I'd like to introduce
23 you to my crisis comms specialist that focuses on
24 diversity and culture, Melissa Nathan.

25 Do you see that?

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1 A. I do.

2 Q. Does Melissa Nathan focus on diversity and
3 culture?

4 A. Among other things. She's very good with that.

5 Q. Does she focus on diversity and culture more
6 than she focuses on entertainment?

7 MR. COOLEY: Objection.

8 THE WITNESS: I don't know that those are
9 different.

10 Q. (BY MR. GOTTLIEB) Are they the same in your
11 view?

12 A. Could be.

13 Q. You say, (Reading:) Melissa and/or her team
14 can connect with you today so we can get their
15 perspective. Let me know if you're open to that; I can
16 get their feedback team, my forensic team's results, and
17 then we can connect on Monday.

18 Do you see that?

19 A. I do.

20 Q. But you had no intention of getting your
21 forensic team's results by Monday. Is that what I
22 understand you to be saying?

23 A. I need more details.

24 Q. Why do you need more details than what you
25 wrote?

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1 A. I -- I don't recall exactly.

2 Q. Well, I mean, how often do you tell people that
3 you have some team working on something, when it's not
4 true?

5 A. It's puffery.

6 Q. This is puffery? Okay.

7 You say, (Reading:) Either way this is our
8 wheelhouse and I'm happy to discuss.

9 Do you see that?

10 A. I do.

11 Q. What are you trying to convey when you tell
12 somebody "this is our wheelhouse"?

13 A. It's crisis management.

14 Q. And you're trying to convey to [REDACTED] that
15 the problem she's facing is in the wheelhouse of you and
16 Ms. Nathan, right?

17 A. I don't know specifically. Crisis management
18 is the wheelhouse.

19 Q. But you're not talking about crisis management
20 generally to [REDACTED], right? You're talking about
21 the problems she's facing?

22 A. We don't know the details yet.

23 Q. So you were saying then that all crisis
24 management is in your wheelhouse?

25 A. I don't know exactly what there -- what's being

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1 the Texas case. In fact, Ms. Lively has prevented us
2 from taking discovery in the Texas case. So if -- if
3 your questions are limited to the New York case where
4 the accusations are clear about what she's alleging,
5 I'll let him answer. But I don't want him answering
6 questions about the Texas case.

7 MR. GOTTLIEB: Well, as you recall in
8 Ms. Lively's deposition, you, in your limited time, and
9 it was limited, asked her questions about the Texas 202
10 position, correct?

11 MR. BABCOCK: Well, I asked her what I
12 asked her.

13 MR. GOTTLIEB: Okay.

14 MR. BABCOCK: But I wasn't asking her about
15 the Texas case.

16 Q. (BY MR. GOTTLIEB) I'm not asking you
17 specifically about allegations in your Texas complaint.
18 Okay?

19 A. Okay.

20 Q. But at any point in time, perhaps other than
21 your allegations in your Texas complaint, have you ever
22 claimed or alleged that Ms. Lively fabricated her
23 allegations of sexual harassment?

24 A. Not that I recall.

25 Q. Has -- have you ever had, to your knowledge, a

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1 Q. Okay. At any point in time, did you gain that
2 understanding?

3 A. As I said, he's my lawyer since 2020. That was
4 my first phone call. We were trying to process what it
5 meant.

6 Q. All right. Did you understand when you
7 received this email and the attached cease and desist
8 letter that you were required to preserve all documents
9 concerning Ms. Lively's sexual harassment allegations
10 against Mr. Baldoni and other Wayfarer parties?

11 MR. BABCOCK: I don't need to say this, but
12 exclude conversations with a -- your lawyer. Lawyers.

13 THE WITNESS: Yes.

14 Ask the question again, I'm sorry.

15 Q. (BY MR. GOTTLIEB) Did you understand that this
16 letter required you to preserve all documents concerning
17 Ms. Lively's sexual harassment allegations against
18 Mr. Baldoni and other Wayfarer parties?

19 A. I did.

20 Q. And did you understand that the document or
21 the -- sorry. Did you understand that you were required
22 to preserve all documents concerning Ms. Lively's
23 retaliation allegation against the Wayfarer parties?

24 A. I did.

25 Q. Did you understand that preservation

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1 requirement to extend to electronically stored
2 information?

3 A. Yes.

4 Q. And you saw the long description of
5 electronically stored information in this letter as you
6 were reviewing it?

7 A. I did.

8 Q. You saw that that included things like WhatsApp
9 and Signal?

10 A. I did.

11 Q. And emails and text messages?

12 A. Yes.

13 Q. Okay. What steps did you take, and I don't
14 want to know about conversations that you had with your
15 counsel. But what steps, if any, did you personally
16 take to preserve documents after receiving this letter?

17 A. I called my lawyer.

18 Q. Okay. Apart from talking to your attorneys,
19 which I will not ask you about, did you take any steps
20 personally to engage in document preservation for your
21 devices?

22 A. I did what they suggested.

23 Q. Okay. Did you -- did you personally go into
24 your phone and change any settings, retention settings
25 on your Signal app after receiving this letter?

CONFIDENTIAL - ATTORNEYS' EYES ONLY

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1 A. I don't recall doing that.

2 Q. Okay. Do -- do you recall examining the
3 retention settings on the Street Relations email
4 accounts?

5 A. I don't recall.

6 Q. Do you -- do you know one way or the other
7 whether the Street Relations email account have
8 retention settings on them?

9 A. Yeah, they retain everything --

10 Q. For how long?

11 A. -- from my understanding. I don't recall.

12 Q. Okay. So you don't know if that's indefinite
13 or for some period of time?

14 A. I don't as we sit here.

15 Q. Okay. Do you recall going into your WhatsApp
16 account and changing any settings in that?

17 A. I don't recall.

18 Q. And how about in iMessage, do you recall
19 looking at any settings that you might have had with
20 respect to data retention on the cloud for -- for Apple
21 or for your device with Apple?

22 A. I don't recall.

23 Q. You, from time to time, use the -- the voice
24 note feature; is that right?

25 A. Yes.

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1 Q. And am I right that the voice note feature is
2 configured in a way on Apple devices where voice notes
3 will not automatically be saved to devices?

4 A. I -- I don't know the specifics.

5 Q. Okay.

6 A. What's the question again, what you're asking?

7 Q. Do you know if on your device, the -- the voice
8 notes that you send or receive are automatically saved
9 to your device or whether you have to save them
10 yourself?

11 A. I -- I don't know offhand.

12 Q. Okay. So you don't know one way or the other
13 whether, for example, if you send a voice note to
14 someone in the context of a text thread whether that is
15 saved, that being the voice note, along with the text
16 thread?

17 A. I'd need to know more specifics.

18 Q. Okay. But you don't know, right?

19 A. I -- not offhand.

20 Q. Okay. Apart from your Street Relations email,
21 do you use any other email account?

22 A. There's a Mac address.

23 Q. Okay.

24 A. Nothing for business.

25 Q. Have you ever received or sent, whether

CONFIDENTIAL - ATTORNEYS' EYES ONLY

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1 THE WITNESS: Yeah, I -- I -- I don't -- I
2 don't recall.

3 Q. (BY MR. GOTTLIEB) So you can't rule it out?

4 MR. COOLEY: Objection.

5 THE WITNESS: I -- I need to know more
6 details.

7 Q. (BY MR. GOTTLIEB) You've got to answer my
8 question, sir. It's a yes or no question. Can you rule
9 out the possibility that you were on a Signal chain with
10 Katie Case and Melissa Nathan as this -- on the date of
11 this message here, August 8th, 2024?

12 MR. COOLEY: Same objection.

13 MR. BABCOCK: Me too.

14 THE WITNESS: Yeah, I -- I don't know what
15 indicates this is a Signal message, so I'd need to know
16 more information.

17 Q. (BY MR. GOTTLIEB) Okay. You were
18 communicating with people at TAG by this time in August
19 of 2024, right, on Signal?

20 A. Sure, yes.

21 Q. Including Melissa Nathan?

22 A. Correct.

23 Q. Okay. And you just don't recall whether this
24 is among the Signal messages that -- or Signal chains
25 that you were on?

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1 interested in the outcome of the action.

2 Certified to by me this 10th day of October
3 2025.

4 

5 JANALYN ELKINS

6 Texas CSR 3631

Expiration Date 1/31/2027

7 Veritext Legal Solutions

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OCTOBER 10, 2025

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Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 BLAKE LIVELY,)
4 PLAINTIFF) CASE NO.
5) 1:24-CV-10049-LJL
6 VS.) (CONSOLIDATED WITH
7) 1:25-CV-00449-LJL
8 WAYFARER STUDIOS LLC,)
9 JUSTIN BALDONI, JAMEY)
10 HEATH, STEVE SAROWITZ,)
11 IT ENDS WITH US MOVIE)
12 LLC, MELISSA NATHAN,)
13 THE AGENCY GROUP PR)
14 LLC, AND JENNIFER ABEL,)
DEFENDANTS)

JENNIFER ABEL,)
THIRD-PARTY)
PLAINTIFF)
VS.)
JONESWORKS LLC)
THIRD-PARTY)
DEFENDANT)

15 ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE
16 OCTOBER 10
17 CONFIDENTIAL

18 ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE,
19 produced as a witness at the instance of the Jonesworks
20 and duly sworn, was taken in the above styled and
21 numbered cause on Friday, October 10, 2025, from 9:06
22 a.m. to 2:25 p.m., before Janalyn Elkins, CSR, in and
23 for the State of Texas, reported by computerized
24 stenotype machine, at the offices of Jackson Walker, 100
25 Congress Avenue, Suite 1100, Austin, Texas, pursuant to
the Federal Rules of Civil Procedure and any provisions
stated on the record herein.

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Page 2

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Also Present:

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MAGGIE KANE (Concierge)

ALICE BUTTRICK

AUTUMN ADAMS-JACK

BRYAN FREEDMAN

WERKENTHIN

KRISTIN BENDER

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MICHAELA CONNOLLY

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1 VIDEOGRAPHER: Good morning. We are going
2 on the record at 9:06 a.m. Central Standard Time on
3 October 10, 2025. This is Media Unit 1 of the
4 video-recorded deposition of Jed Wallace taken by
5 counsel for the Plaintiff in the matter of Stephanie
6 Jones, et al. versus Jennifer Abel, et al. Filed in the
7 United States District Court for the Southern District
8 of New York, Case No. 125-CV-00779-LJL. The location of
9 the deposition is 100 Congress Avenue, Austin, Texas.
10 My name is Timothy Desadier representing Veritext, and I
11 am the videographer. The court reporter is Janalyn
12 Elkins from the firm Veritext.

13 Counsel and all present will now state
14 their appearances and affiliations for the record,
15 beginning with the noticing attorney.

16 MS. TAHLER: Kristin Tahler from Quinn
17 Emanuel for Stephanie Jones and Jonesworks.

18 MS. ANASTASIO: Morgan Anastasio, Quinn
19 Emanuel for the same.

20 MR. GOTTLIEB: Mike Gottlieb from Willkie
21 Farr & Gallagher on behalf of Ms. Lively.

22 MS. TAUSTINE: Melissa Taustine from
23 Willkie Farr & Gallagher on behalf of Blake Lively.

24 MS. PRATHER: Laura Prather, Haynes & Boone
25 on behalf of Ms. Lively.

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1 MR. COOLEY: Miles Cooley and Theresa
2 Troupson, Liner Freedman Taitelman + Cooley on behalf of
3 the Wayfarer Defendants.

4 MR. BABCOCK: Chip Babcock with Jackson
5 Walker on behalf of the witness.

6 JED WALLACE,
7 having been duly sworn, testified as follows:

8 MR. BABCOCK: Kristin, do we want this
9 confidential or do you care?

10 MS. TAHLER: Yeah, no, I think -- I think
11 we should designate it confidential.

12 MR. BABCOCK: Okay. And -- and I believe
13 there's an -- an agreement that the deposition will last
14 no longer than four hours.

15 MS. TAHLER: Yes, there's that agreement.

16 MR. BABCOCK: Okay.

17 MS. TAHLER: And there may be moments of
18 AEO, but it doesn't look like that's going to be an
19 issue today, because I don't think we have any clients
20 on.

21 MR. BABCOCK: Great. Perfect.

22 EXAMINATION

23 Q. (BY MS. TAHLER) All right. Good morning,
24 Mr. Wallace.

25 A. Good morning.

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1 privileged.

2 Q. (BY MS. TAHLER) Let's -- what about [REDACTED]
3 [REDACTED]? Did you ever do any work with Mr. Freedman in
4 connection with [REDACTED]?

5 MR. COOLEY: Objection.

6 THE WITNESS: Not that I recall.

7 Q. (BY MS. TAHLER) You don't recall one way or
8 another?

9 A. I don't recall.

10 Q. What about with [REDACTED] did you do any work with
11 Mr. Freedman in connection with [REDACTED]?

12 MR. COOLEY: Objection.

13 THE WITNESS: Not that I recall.

14 Q. (BY MS. TAHLER) What about [REDACTED]?

15 MR. COOLEY: Is there -- is there a
16 question? What about him?

17 Q. (BY MS. TAHLER) Did you do any work with
18 Mr. Freedman in connection with [REDACTED]?

19 MR. COOLEY: Objection.

20 THE WITNESS: No.

21 Q. (BY MS. TAHLER) Are you familiar with [REDACTED]
[REDACTED]?

22 MR. COOLEY: Objection.

23 THE WITNESS: In my -- the actor?

24 Q. (BY MS. TAHLER) Yes.
25

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1 A. Yes.

2 Q. Did you do any work with Mr. Freedman in
3 connection with [REDACTED]

4 MR. COOLEY: Objection.

5 THE WITNESS: No.

6 Q. (BY MS. TAHLER) Mr. Wallace, who is paying
7 your legal fees in connection with this matter?

8 A. That would be [REDACTED]

9 Q. Do you have an indemnification agreement with
10 [REDACTED]

11 MR. COOLEY: Objection.

12 THE WITNESS: I'm not aware of anything
13 like that.

14 Q. (BY MS. TAHLER) You're not aware of any
15 agreement you have with [REDACTED]

16 MR. COOLEY: Objection.

17 THE WITNESS: I'm not.

18 Q. (BY MS. TAHLER) Are you being paid for any
19 consulting services in connection with this matter?

20 A. No.

21 Q. Are you being compensated at all for your time
22 as an expert in connection with this matter?

23 A. Not whatsoever.

24 Q. Mr. Wallace, what is your preferred method of
25 communication for work?

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1 A. Like this, I'm talking.

2 Q. When you are writing someone, what is your
3 preferred method of communication?

4 A. Depends on the circumstances.

5 Q. Would you say that most of your communications
6 that are work related are via Signal?

7 A. It depends on the circumstances. I can't say
8 that.

9 Q. In what circumstances would Signal be your
10 preferred method of communication?

11 MR. BABCOCK: Objection.

12 MR. COOLEY: Join.

13 THE WITNESS: Could you -- could you
14 rephrase that question?

15 Q. (BY MS. TAHLER) Well, you just said it depends
16 on the circumstances that would dictate the type of
17 communication you were -- or the way that you were
18 communicating. And I'm wondering in what circumstances,
19 picking up on your answer, you would want to use Signal?

20 A. Yeah, I can't speak to that right now without
21 more details. I'm not certain.

22 Q. Are there particular circumstances that are in
23 your mind right now that you would want to have a
24 conversation on Signal with respect to your work?

25 MR. COOLEY: Objection.

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1 THE WITNESS: Not in particular.

2 Q. (BY MS. TAHLER) From time to time, you ask
3 people to switch over to Signal; isn't that right?

4 MR. COOLEY: Objection.

5 THE WITNESS: I mean, I'd have to know more
6 details.

7 Q. (BY MS. TAHLER) Do you have any recollection
8 of having a conversation with people and asking to
9 switch over to Signal?

10 A. I -- could you rephrase that question?

11 Q. Yeah. Do you have any recollection of being on
12 a text chain or an email chain with a group of people
13 and asking to switch over to communication via Signal?

14 A. Not specifically.

15 Q. We're going to look at an exhibit that we
16 looked at yesterday, which is AEO, but...

17 MR. BABCOCK: Do we need to go AEO?

18 MS. TAHLER: Yes.

19 MR. BABCOCK: How do we do that?

20 MS. TAHLER: I think we don't need to right
21 now because there's nobody -- we'll just mark it AEO in
22 the transcript.

23 MR. BABCOCK: Okay.

24 MS. ANASTASIO: Janalyn, do you have the
25 exhibit copies from yesterday?

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1 Katie Case?

2 A. I don't recall.

3 Q. Was it within the last year?

4 A. No.

5 Q. Within the last five years?

6 A. Yeah, I don't recall.

7 Q. About how many times do you recall

8 communicating with Katie Case?

9 A. I -- I have no idea.

10 Q. Did you work with Katie Case in connection with
11 work that you did for [REDACTED]?

12 A. Not that I recall.

13 Q. Do you recall Katie Case having any involvement
14 in work that you did for [REDACTED]?

15 A. Not that I recall.

16 Q. Is it possible?

17 A. I'd need more details. I'm not certain.

18 Q. What about [REDACTED] did Katie
19 Case have any -- did you do any work related to [REDACTED]
20 [REDACTED] with Katie Case?

21 MR. COOLEY: Objection.

22 THE WITNESS: Yeah, not that I recall.

23 Q. (BY MS. TAHLER) Do you recall being on a
24 Signal chat with Katie Case and Melissa Nathan in August
25 of 2024?

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1 if requested?

2 MR. COOLEY: Objection.

3 THE WITNESS: I -- I cannot do that.

4 Q. (BY MS. TAHLER) Do you know people who can do
5 that?

6 MR. COOLEY: Objection.

7 THE WITNESS: Not that I recall.

8 Q. (BY MS. TAHLER) We're going to mark a couple
9 of exhibits now, so bear with me while we go through
10 that.

11 A. Okay.

12 MS. ANASTASIO: We're at 41.

13 THE REPORTER: 42.

14 MS. ANASTASIO: 42. So this will be 42.

15 (Exhibit Nos. 42-46 were marked.)

16 Q. (BY MS. TAHLER) Mr. Wallace, you've been
17 handed several exhibits. Before we get into the details
18 of the exhibits, are you familiar generally that in
19 May 2024, a website and a number of social media
20 accounts that were unfavorable to Stephanie Jones
21 appeared online?

22 A. I don't know the specifics, but I've heard
23 that.

24 Q. Where did you hear that from?

25 A. I believe the lawsuit. And early on, a

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1 conversation with Stephanie.

2 Q. You've been handed a printout of the website
3 that I'm referring to, a second website that was put up,
4 and then a Twitter account, a Facebook account, and a
5 Pinterest account, all that link back to that website.

6 Have you seen these documents before
7 online?

8 A. Can -- can I read through them?

9 Q. Yeah. I'm not going to ask you detailed
10 questions about the website, so you don't have to --

11 A. Okay.

12 Q. -- read the whole thing. But if you want to
13 familiarize yourself.

14 A. Okay. Thanks.

15 Q. Mr. Wallace, you've just reviewed Exhibits 42
16 through 46, which are a series of websites and negative
17 social media accounts about Stephanie Jones.

18 Have you seen these documents online before
19 today?

20 A. I did see this website.

21 Q. You did see Exhibit 42?

22 A. I believe so.

23 Q. When did you see Exhibit 42?

24 A. I don't recall.

25 Q. Were you involved in the creation of

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1 Exhibit 42?

2 A. No.

3 Q. Were you involved at all in getting Exhibit 42
4 online?

5 A. No.

6 Q. Were you involved at all in the copy that is
7 drafted for Exhibit 42?

8 A. No.

9 Q. Did you contribute to its existence in any way?

10 A. No.

11 Q. We've discussed Katie Case earlier,
12 Mr. Wallace. Are you aware that Katie Case testified in
13 this matter?

14 A. I don't know the specifics. I'm aware she
15 testified.

16 Q. Have you reviewed her testimony?

17 A. I have not.

18 Q. You understand Ms. Case testified under oath
19 under penalty of perjury, do you?

20 A. Okay, yeah.

21 Q. Like you are today?

22 A. Yes.

23 Q. And I will represent to you -- were you on a
24 Signal chat with Ms. Case and Ms. Nathan in 2024, in May
25 of 2024?

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1 (Brief recess.)

2 VIDEOGRAPHER: Back on the record. Time is
3 10:08.

4 Q. (BY MS. TAHLER) Mr. Wallace, when we broke, we
5 were looking at a series of websites and social media
6 accounts related to Ms. Jones. Could you look at what's
7 been marked as Exhibit 44?

8 A. Yes.

9 Q. Exhibit 44 is a series of tweets related to the
10 stephaniejonesleaks website.

11 Do you see that?

12 A. Tweets or accounts?

13 Q. Accounts. Apologies.

14 A. Yes.

15 Q. Did you have any involvement of any tweets that
16 went into this -- that were posted onto any of those
17 accounts?

18 MR. COOLEY: Objection, form.

19 THE WITNESS: Yeah, I did not.

20 Q. (BY MS. TAHLER) Ms. Case testified that she
21 drafted tweets about Ms. Jones and posted to one of
22 those sites. Are you aware of that?

23 A. I am not.

24 Q. Did you have any involvement with Ms. Case in
25 tweets that were posted to any of those accounts?

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1 A. I did not.

2 Q. I'll represent to you that Katie Case testified
3 that she spoke with you in connection with the tweets.
4 Does that refresh any recollection that you worked with
5 Ms. Case in connection with tweets that were posted to
6 any of the accounts in Exhibit 44?

7 MR. BABCOCK: Objection.

8 THE WITNESS: It does not.

9 Q. (BY MS. TAHLER) Mr. Wallace, are you -- is it
10 your testimony today that if Katie Case testified under
11 oath that she spoke to you in connection with tweets
12 that were posted to one of the accounts in Exhibit 44
13 that Ms. Case gave false under-oath testimony?

14 MR. BABCOCK: Objection.

15 THE WITNESS: Yeah, I have no idea what her
16 testimony was.

17 MR. COOLEY: Same.

18 THE WITNESS: Can't answer that.

19 Q. (BY MS. TAHLER) I'm representing to you that
20 Ms. Case testified that she worked with you in
21 connection with tweets that were posted to one of the
22 accounts at Exhibit 44. And I'm asking you if it is
23 your testimony that Ms. Case testified about that
24 falsely?

25 MR. BABCOCK: Objection.

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1 MR. COOLEY: Same.

2 THE WITNESS: I can't speak to that.

3 Q. (BY MS. TAHLER) So Ms. Case's testimony could
4 be accurate; is that right?

5 MR. BABCOCK: Objection.

6 MR. COOLEY: Same.

7 THE WITNESS: I can't answer that.

8 Q. (BY MS. TAHLER) It's possible that Ms. Case
9 spoke to you about tweets that were posted to one of the
10 accounts in Exhibit 44?

11 A. I don't recall.

12 Q. So it's possible?

13 A. I can't answer that.

14 Q. You can answer yes or no if it's possible.

15 MR. BABCOCK: Objection.

16 THE WITNESS: I -- I don't --

17 MR. COOLEY: Joining.

18 THE WITNESS: -- have all the details. I'm
19 not certain how to answer that.

20 Q. (BY MS. TAHLER) There are no more details to
21 give. I'm simply asking you yes or no. Is it possible
22 that Katie Case spoke to you about tweets that were
23 posted to one of the accounts in Exhibit 44?

24 MR. COOLEY: Objection.

25 MR. BABCOCK: Same objection.

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1 Q. (BY MS. TAHLER) You're not certain whether or
2 not a website [REDACTED] and a website
3 stephaniejonesleaks are similar?

4 MR. COOLEY: Objection.

5 MR. BABCOCK: Objection.

6 THE WITNESS: Yeah, I -- I don't know.
7 That's a broad statement. They both have URL addresses.

8 Q. (BY MS. TAHLER) Okay. Mr. Wallace, Katie Case
9 wrote the copy for Exhibit 51; isn't that right?

10 A. I don't know.

11 Q. Sitting here today, do you believe it's
12 possible that Ms. Case wrote the copy for Exhibit 41?

13 MR. COOLEY: Objection.

14 MR. BABCOCK: Objection.

15 THE WITNESS: Yeah, I can't speak to that.
16 I'm not sure.

17 Q. (BY MS. TAHLER) And you were involved in
18 creating Exhibit 51 as well; isn't that right?

19 A. That is not right.

20 Q. You had no involvement in Exhibit 51?

21 MR. COOLEY: I'm sorry. One second.
22 Objection.

23 THE WITNESS: Could you repeat the
24 question, please?

25 Q. (BY MS. TAHLER) Yes. Did you have any

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1 involvement in what came to be Exhibit 51?

2 MR. COOLEY: Objection.

3 THE WITNESS: I did not.

4 Q. (BY MS. TAHLER) Did you have any discussions
5 with anyone related to what would become Exhibit 51?

6 MR. COOLEY: Objection.

7 THE WITNESS: Not that I recall.

8 Q. (BY MS. TAHLER) Did you ever discuss
9 Exhibit 51 with Ms. Nathan?

10 A. Not that I recall.

11 Q. What about Roza Kalantari?

12 A. Not that I recall.

13 MS. ANASTASIO: This will be 52.

14 (Exhibit No. 52 was marked.)

15 Q. (BY MS. TAHLER) Mr. Wallace, you are now
16 reviewing what's been marked as KCase-several zeros-4949
17 through 4962. This is a communication, sir, between
18 Ms. Case and Ms. Nathan. You are not on the
19 communication, but you are referenced in it. So if
20 you'd like to review it, I'm going to have some
21 questions.

22 A. Okay.

23 Q. Mr. Wallace, have you ever seen Exhibit 52
24 before today?

25 A. What exhibit? The entire exhibit?

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1 behalf?

2 A. No, I don't know. I can't answer one way or
3 the other. I don't recall.

4 Q. And I'm just asking yes or no. Is it possible
5 that you did some sort of work on their behalf?

6 MR. BABCOCK: Objection.

7 MR. COOLEY: Join.

8 THE WITNESS: Yeah, I -- I can't answer
9 that. I'm not certain.

10 Q. (BY MS. TAHLER) Mr. Wallace, did you work on a
11 website related to [REDACTED] ?

12 A. I did not.

13 MS. ANASTASIO: 63.

14 (Exhibit No. 63 was marked.)

15 MS. ANASTASIO: This will be 63.

16 Q. (BY MS. TAHLER) Mr. Wallace, you're now
17 reviewing what's been marked as Exhibit 63. It is a
18 website available at [REDACTED]

19 Do you see that?

20 A. Yeah, I'm reviewing now.

21 Q. I'm not going to ask you any detailed questions
22 about it, sir.

23 A. Okay, yeah.

24 Q. Mr. Wallace, are you aware that this website
25 came online around [REDACTED] ?

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1 A. I am not.

2 Q. At the time, [REDACTED]
3 [REDACTED]. Are you aware of
4 that?

5 A. I'm not aware of their story.

6 Q. Are you aware whether or not Katie Case had any
7 role in drafting the copy for this website?

8 A. I don't know that.

9 Q. Katie Case testified under oath that she
10 performed work in connection with [REDACTED]
11 with you and Melissa Nathan -- Nathan. Does that
12 refresh your recollection that you did some work in
13 connection with [REDACTED] in connection
14 with Ms. Case?

15 MR. BABCOCK: Objection.

16 MR. COOLEY: Join.

17 THE WITNESS: Yeah, it does not.

18 Q. (BY MS. TAHLER) Do you recall doing any work
19 for [REDACTED] with Ms. Case?

20 A. I don't recall.

21 Q. Do you have any basis to dispute Ms. Case's
22 under-oath testimony?

23 MR. BABCOCK: Objection.

24 MR. COOLEY: Objection.

25 THE WITNESS: Yeah, I can't do that. Same

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1 as earlier answers, not one way or the other.

2 Q. (BY MS. TAHLER) Sitting here today, do you
3 have any basis to dispute Ms. Case's under-oath
4 testimony?

5 MR. COOLEY: Same objection.

6 MR. BABCOCK: Objection.

7 THE WITNESS: I -- I don't know what her
8 testimony was, nor do I have any basis to answer that
9 question.

10 Q. (BY MS. TAHLER) I'm just telling you -- I'm
11 representing to you that Ms. Case testified that she
12 performed work related to [REDACTED] with
13 you and Melissa. And I'm asking yes or no. Do you have
14 any basis to dispute that under-oath testimony?

15 MR. BABCOCK: Object to the question.

16 MR. COOLEY: Same.

17 THE WITNESS: Yeah, I can't answer that. I
18 don't have all the circumstances.

19 Q. (BY MS. TAHLER) Can you tell me what
20 circumstances you would need?

21 MR. BABCOCK: Objection.

22 MR. COOLEY: Join.

23 THE WITNESS: No, I can't.

24 Q. (BY MS. TAHLER) Mr. Wallace, do you recall our
25 discussing earlier [REDACTED]?

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1 recall?

2 A. Not that I recall.

3 Q. Mr. Wallace, in connection with that work you
4 were doing for Wayfarer, do you have any recollection of
5 ever speaking with Ms. Jones?

6 MR. COOLEY: Objection.

7 THE WITNESS: Related to Wayfarer?

8 Q. (BY MS. TAHLER) Yes.

9 A. I do not have any recollection.

10 Q. Do you have any recollection of ever being --
11 being copied on any communications with Ms. Jones in
12 connection with the work you were doing for Wayfarer?

13 A. Not that I recall.

14 Q. Did you ever understand that Ms. Jones was
15 involved at all in the work that you were doing for
16 Wayfarer?

17 MR. COOLEY: Objection.

18 THE WITNESS: Yeah. Could you rephrase
19 that question?

20 Q. (BY MS. TAHLER) I'm wondering whether or not
21 you had any understanding that Ms. Jones was involved in
22 all -- at all in any of the work you were doing for
23 Wayfarer.

24 A. I knew Ms. Jones represented Wayfarer at one
25 point.

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1 Q. But with regard to your work, you never spoke
2 to her, right?

3 A. I don't recall.

4 Q. Sitting here today, you don't have a
5 recollection of speaking with her in connection with
6 Wayfarer; is that right?

7 A. Not in collect -- connection with Wayfarer, no,
8 I don't recall.

9 MS. ANASTASIO: 72.

10 (Exhibit No. 72 was marked.)

11 MR. BABCOCK: Are you done with 1?

12 MS. TAHLER: I am.

13 MR. BABCOCK: Let's put that one back in
14 the stack so that we don't lose it.

15 THE WITNESS: You handed me this one.

16 Q. (BY MS. TAHLER) Mr. Wallace, you're now
17 reviewing what's been marked as Exhibit 72. It's a
18 document Bates stamped Jonesworks_MN_ several zeros 1249
19 through 1258.

20 Mr. Wallace, I'm not going to ask you about
21 any of the details of the article that you're being
22 forwarded.

23 A. Okay.

24 Q. Mr. Wallace, is Exhibit -- Exhibit 62 a forward
25 that Melissa sent you on or about August 13th, 2024?

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REPORTER'S CERTIFICATION
DEPOSITION OF JED WALLACE
TAKEN OCTOBER 10, 2025

I, Janalyn Elkins, Certified Shorthand
Reporter in and for the State of Texas, hereby certify
to the following:

That the witness, JED WALLACE, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the original deposition was delivered to
KRISTIN TAHLER;

That a copy of this certificate was served on
all parties and/or the witness shown herein on
_____.

I further certify that pursuant to FRCP No.
30(f)(i) that the signature of the deponent was not
requested by the deponent or a party before the
completion of the deposition.

I further certify that I am neither counsel
for, related to, nor employed by any of the parties in
the action in which this proceeding was taken, and
further that I am not financially or otherwise

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1 interested in the outcome of the action.

2 Certified to by me this 11th day of October
3 2025.

4 

5 JANALYN ELKINS

6 Texas CSR 3631

Expiration Date 1/31/2027

7 Veritext Legal Solutions

Firm Registration No. 571

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