

**September 29, 2025**

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\*\* C O N F I D E N T I A L \*\*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:24-CV-10049-LJL  
(Consolidated with 1:25-cv-00449-LJL)

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BLAKE LIVELY,  
                   Plaintiff,  
 - against -

WAYFARER STUDIOS LLC, a Delaware  
Limited Liability Company, JUSTIN  
BALDONI, an individual, JAMEY HEATH, an  
individual, STEVE SAROWITZ, an individual,  
IT ENDS WITH US MOVIE LLC, a California  
Limited Liability Company, MELISSA  
NATHAN, an individual, THE AGENCY  
GROUP PR LLC, a Delaware Limited Liability  
Company, JENNIFER ABEL, an individual,  
JED WALLACE, an individual, and STREET  
RELATIONS INC., a California Corporation,  
Defendants.

-----x

(Caption continued)  
September 29, 2025  
10:06 a.m.

Videotaped Deposition of KEVIN  
ALEXANDER, taken by Defendants, pursuant to  
Subpoena, held at the offices of Meister  
Seelig & Fein PLLC, 125 Park Avenue, New  
York, New York, before Todd DeSimone, a  
Registered Professional Reporter and Notary  
Public of the State of New York.

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2 conversation that happened in the car ride,  
3 but right now my questions are just about  
4 this paragraph that I read.

5 Did you ever hear Mr. Baldoni  
6 discuss his personal sexual experience?

7 MS. ROESER: Objection.

8 A. Yes.

9 Q. Did that occur during that car  
10 ride?

11 A. Yes.

12 Q. Did you ever hear Mr. Baldoni  
13 discuss a porn addiction?

14 A. No.

15 Q. Did you ever hear Mr. Baldoni  
16 try to pressure Ms. Lively to reveal  
17 details about her intimate life?

18 A. No.

19 Q. Now I'm going to read from  
20 paragraph 92 of the complaint, and, again,  
21 if you want me to hand it to you so you can  
22 read it, you just let me know.

23 "During a car ride with  
24 Ms. Lively, her assistant, and driver,  
25 Mr. Baldoni claimed to Ms. Lively that he

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2 had been sexually abused by a former  
3 girlfriend which he has since shared  
4 publicly." I'm going to stop there.

5 Where did the car ride start,  
6 like what destination did everyone get into  
7 the car?

8 A. The apartment.

9 Q. And without giving me the  
10 address, what apartment are you referring  
11 to? By that, can you give me a borough,  
12 uptown, downtown?

13 A. Tribeca.

14 Q. And is that your employer's  
15 apartment?

16 A. Yes.

17 Q. What time did that car ride  
18 start?

19 A. I would say midday.

20 Q. Is that before noon or after  
21 noon?

22 A. Roughly right before noon.

23 Q. And were you already present at  
24 the Tribeca apartment when everyone got  
25 into the car? I mean, had you been waiting

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2 Q. Who told you that?

3 A. Blake.

4 Q. Did Blake say anything else to  
5 you other than "This is Justin"?

6 A. No.

7 Q. Did anyone else get into the  
8 car other than Sophia, Blake Lively, and  
9 Justin Baldoni?

10 A. No.

11 Q. Where was Sophia sitting in the  
12 car?

13 A. Front passenger.

14 Q. And where was Ms. Lively  
15 sitting?

16 A. Strong side, behind me, behind  
17 the driver's seat.

18 Q. And that would leave  
19 Mr. Baldoni in the rear passenger?

20 A. Rear passenger, behind Sophia.

21 Q. What type of car was it?

22 A. Escalade.

23 Q. And do you know who owned that  
24 vehicle?

25 A. Walkers Holding.

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2 Q. And what is Walkers Holding?

3 A. That's what I know. It is on  
4 the insurance card.

5 Q. It wasn't your personal  
6 vehicle?

7 A. No.

8 Q. And where were you going? I  
9 know you picked them up outside the  
10 apartment in Tribeca. Do you know where  
11 you were heading?

12 A. To Jersey to a production  
13 office.

14 Q. When was this car ride? Can  
15 you give me the month?

16 A. Springtime 2023 I can recall.

17 Q. Did you make any stops along  
18 the way from Tribeca to the New Jersey  
19 production office other than traffic stops  
20 at lights, stop signs, things like that?

21 A. No.

22 Q. Did you pick anyone else up  
23 along the way?

24 A. No.

25 Q. How long was the car ride from

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2 Tribeca to the New Jersey production  
3 office?

4 A. 20 to 25 minutes.

5 Q. That's pretty good, no traffic  
6 that day.

7 Was the radio on during any  
8 portion of that car ride?

9 MS. ROESER: Objection.

10 A. No.

11 Q. And it was during that period  
12 of time where you heard Mr. Baldoni discuss  
13 his personal sexual experience; is that  
14 correct?

15 A. Yeah.

16 Q. Did you hear Mr. Baldoni  
17 discuss anything else during that car ride?

18 A. Yes.

19 Q. Can you tell us what you heard  
20 him discuss during the car ride?

21 A. He was discussing his sexual  
22 relations with women. As we were driving,  
23 he stated that, and it took my focus off  
24 driving because I can't forget this, you  
25 know, his sexual relations with women, how

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2 he was forced on and he forced himself on  
3 women. To me it was very out of the  
4 ordinary to meet somebody and talk like  
5 that in a vehicle. That's why it caught my  
6 attention.

7 Basically he kept talking about  
8 his sexual relations, and, again, like I'm  
9 repeating myself I believe, but, you know,  
10 he would force himself on women. If they  
11 said no, this, that, he would revert back.  
12 It was just disturbing.

13 Q. Anything else that you can  
14 recall?

15 A. While we were driving, for some  
16 reason he pointed out his place of living.

17 Q. I'm sorry?

18 A. His place of living in Jersey  
19 City as we were driving. I remember that.  
20 He for some reason had us pause. And then  
21 when we got to the production office, which  
22 was down the road from that area, I pulled  
23 over, let everybody out, I stated to Blake  
24 "I feel very uncomfortable. Something is  
25 not right here. I would like to do a

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2 background check on him or something," and  
3 later to learn that he was the producer in  
4 production of this movie.

5 Q. How did you learn that?

6 A. Basically when I brought up his  
7 name, everybody was like he is part of the  
8 movie, you know. Well, I shouldn't say it  
9 that way. Like Sophia and Blake said, you  
10 know, that's the production guy, you know,  
11 that movie.

12 Q. Okay. Do you recall anything  
13 else discussed during that car ride other  
14 than what you have already told us?

15 A. I can go through it again. It  
16 just stuck in my head. It is just  
17 basically --

18 Q. I'm not asking you to repeat  
19 yourself, I'm asking did you leave anything  
20 out?

21 A. Him having sexual relations,  
22 force himself on women, women force  
23 themselves on him. It is straightforward,  
24 standard, what went on in that car ride.

25 He did -- he did ramble on

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2 about more stuff, but I didn't pay  
3 attention to it because I was focused on  
4 driving. It is those key points when  
5 someone says, you know, forcing myself on  
6 women, women forced on me, I don't -- I  
7 didn't care, like, you know, it is  
8 disturbing to me. You can't forget  
9 something like that.

10 Q. Okay.

11 A. So that is mainly it.

12 Q. Okay. Did his tone of voice or  
13 volume of speaking remain the same during  
14 the car ride or were there periods of time  
15 where his voice was amplified or he started  
16 to talk lower or something else?

17 MS. ROESER: Objection.

18 A. I don't recall.

19 Q. When in relation to them  
20 getting into the car did he start to  
21 discuss these topics that you just raised?

22 MS. ROESER: Objection.

23 Q. And if it's not clear, you  
24 know, was it right away, was it five  
25 minutes in, was it closer to the production

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2 need to be on heightened alert or do  
3 anything different?

4 MS. ROESER: Objection.

5 A. Not that I recall.

6 MR. SCHUSTER: I have nothing  
7 else.

8 MS. ROESER: I have just a  
9 couple of questions before we go off  
10 record.

11 EXAMINATION BY MS. ROESER:

12 Q. Mr. Alexander, you testified  
13 earlier with respect to a conversation in a  
14 car ride with Mr. Baldoni when he said  
15 something to the effect of that he forced  
16 himself on women. Do you recall that  
17 testimony?

18 A. Yes.

19 Q. Do you recall Mr. Baldoni also  
20 sharing during that car ride something to  
21 the effect of he would force himself on  
22 women even when they said no or did not  
23 consent?

24 A. Yes.

25 Q. Mr. Baldoni's statements during

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2 that car ride, you found them disturbing,  
3 right?

4 MR. SCHUSTER: Objection.

5 A. Yes.

6 Q. You testified this morning that  
7 you found Mr. Baldoni's statements in the  
8 car ride disturbing?

9 A. Yes.

10 Q. Why?

11 A. Who talks like that on your  
12 first car ride meeting somebody when other  
13 people are present? That's why I can't  
14 forget that conversation. Very out of the  
15 ordinary.

16 Q. You found it out of the  
17 ordinary for Mr. Baldoni to discuss forcing  
18 himself on women when they did not consent?

19 MR. SCHUSTER: Objection.

20 A. Yes, and sexual comments that  
21 were passed inside a vehicle with other  
22 women.

23 Q. You testified also that you  
24 expressed to Ms. Lively that you did not  
25 want her to be alone with Mr. Baldoni; is

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2 that right?

3 A. Yes.

4 Q. And was that true to what you  
5 were feeling at the time?

6 A. Yes.

7 Q. Why didn't you want Ms. Lively  
8 to be alone with Mr. Baldoni?

9 A. Due to the conversation in the  
10 vehicle, the stuff he spoke about, you  
11 know, sexual relations, forcing himself on  
12 women, no consent, or he didn't give  
13 consent for a woman to force it on him.  
14 It's disturbing to me when you are first  
15 meeting someone and it just stuck out and  
16 that's why I stated what I stated.

17 Q. You stated it was disturbing to  
18 you when you first meet somebody. Did you  
19 also find it disturbing that Mr. Baldoni  
20 would speak about forcing himself on women  
21 without consent to Ms. Lively at any time  
22 even if it wasn't their first meeting?

23 MR. SCHUSTER: Objection.

24 A. Repeat that.

25 Q. Would you find it appropriate

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2 for Mr. Baldoni to speak about forcing  
3 himself on women without consent --

4 A. No.

5 Q. -- to Ms. Lively even if it  
6 wasn't the first time they met?

7 MR. SCHUSTER: Objection.

8 A. No.

9 MS. ROESER: Nothing further.

10 MR. SCHUSTER: I have a few  
11 follow-ups. I'm sorry.

12 EXAMINATION BY MR. SCHUSTER:

13 Q. You said it was the first car  
14 ride. Do you know if this was the first  
15 interaction between Blake Lively and Justin  
16 Baldoni or was it your first interaction  
17 with Justin Baldoni?

18 A. It is my first, and I don't  
19 recall if they were before the fact.

20 Q. I know you didn't read the  
21 book, but at that time did you have any  
22 understanding of what this movie was about?

23 A. No.

24 Q. Did you have any understanding  
25 that it was about domestic violence?

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2 take following that car ride to ensure that  
3 Blake Lively would not be alone with Justin  
4 Baldoni?

5 MS. ROESER: Objection.

6 A. Repeat the question.

7 Q. Sure. You said that you did  
8 not want Ms. Lively to be alone with  
9 Mr. Baldoni going forward after the car  
10 ride, correct?

11 A. Correct.

12 MS. ROESER: Objection.

13 Q. What, if anything, did you do  
14 to ensure that Ms. Lively would not be  
15 alone with Mr. Baldoni going forward?

16 MS. ROESER: Objection.

17 A. I don't recall.

18 Q. Did you consider yourself a  
19 driver, a driver/security, or something  
20 else?

21 MS. ROESER: Objection.

22 A. A driver/security.

23 Q. And as you sit here today,  
24 those are the words you recall Mr. Baldoni  
25 using, that he forced himself on other

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2 women without consent?

3 A. Yes.

4 Q. Anything else you can recall  
5 specifically that Mr. Baldoni said in that  
6 car ride?

7 A. He had women force themselves  
8 on him as well without consent, that was  
9 part of the car ride, a back and forth  
10 scenario.

11 Q. And did you hear any context  
12 for why he brought this up?

13 MS. ROESER: Objection.

14 A. Not that I know of.

15 MR. SCHUSTER: Okay. Thank  
16 you, sir.

17 MS. ROESER: Off the record.

18 (Continued on the next page.)

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CERTIFICATION

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

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

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

IN WITNESS WHEREOF, I have hereunto set my hand this 30th day of September, 2025.



TODD DESIMONE

\* \* \*

**Deposition of Kevin Alexander – Errata Sheet**

Date: 09/30/2025

Case: *Lively v. Wayfarer Studios, LLC, et al.*

Job No. 7624721

<u>Page</u>	<u>Line</u>	<u>Correction/Change</u>	<u>Reason</u>
45	7-12	Basically he kept talking about his sexual relations, and, again, like I'm repeating myself I believe, but, you know, he would force himself on women. If they said no, this, that, and he repeated it. It was just disturbing.	Clarification
46	21-24	A. Him having sexual relations, force himself on women, women force themselves on him. It is not straightforward or standard, what went on in that car ride.	Clarification
47	4-9	It is those key points when someone says, you know, forcing myself on women, women forced on me, I don't – I didn't care to hear that, like, you know, it is disturbing to me. You can't forget something like that.	Clarification
90	18-19	It was my first, and I don't recall if they met before the fact.	Clarification/grammar

11/10/2025  
 \_\_\_\_\_  
 Date

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 Initials