

September 29, 2025

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____)
BLAKE LIVELY,)
)
Plaintiff,)
)
vs.) No. 1:24-CV-10049-LJL
) (Consolidated with
WAYFARER STUDIOS LLC, a) 1:25-CV-00449-LJL)
Delaware Limited Liability)
Company, JUSTIN BALDONI, an)
individual, JAMEY HEATH, an)
individual, STEVE SAROWITZ, an	HIGHLY CONFIDENTIAL -)
individual, IT ENDS WITH US	ATTORNEYS' EYES ONLY)
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.)
)
_____)
(RELATED CONSOLIDATED CASE.))
_____)

VIDEOTAPED DEPOSITION OF LAURA TEDESCO
Los Angeles, California
Monday, September 29, 2025

Reported by:
RENEE A. PACHECO, RPR, CLR
CSR No. 11564
Job No. 7624695

1 A Responding to consumers who comment or send
2 us messages via direct message.

3 Q And when you talk about strategy, was it --
4 did they come up with the suggestion for strategy
5 and bring it to your team or vice versa? How did 09:06AM
6 that work exactly?

7 A We brought them a brand strategy blueprint
8 as well as for the broad strokes social strategy,
9 which they, as experts in the Blake -- in sort of
10 the space, were able to then fine tune. 09:06AM

11 Q Does The Edit-- does The Edit still work
12 with Family Hive?

13 A They do.

14 Q Did Family Hive shut down any social media
15 accounts at any time in 2024? 09:07AM

16 A We did.

17 Q And which accounts were shut down?

18 A Well, let me clarify what shut down. We
19 stopped posting. So we did not post from around
20 August 20th that sort of third week of 09:07AM
21 August through, I think, around September 9th or
22 10th. And then additionally we stopped posting
23 December -- I think, last week of December.

24 Q For the last week of December, why was the
25 decision made to stop posting? 09:08AM

1 A In December?

2 Q Yes.

3 A We were receiving a lot of negative
4 comments and the environment on social media was
5 quite negative towards Blake.

09:08AM

6 Q And was that -- did that coincide with the
7 filing of the complaint by Blake Lively?

8 MS. CROWLEY: Objection; form.

9 MR. BRUNO: Join.

10 MS. CROWLEY: You can answer, if you know.

09:08AM

11 THE DEPONENT: I think the New York Times
12 article was more visible to consumers at that time.

13 BY MR. KALTGRAD:

14 Q So is it fair to say that you -- you saw an
15 increase in negativity after the New York Times
16 article came out?

09:09AM

17 MR. BRUNO: Objection to form.

18 THE DEPONENT: Actually, I don't -- I can't
19 really actually speak to what would have caused --
20 those were activities and events happening at the
21 same time.

09:09AM

22 BY MR. KALTGRAD:

23 Q Yeah. Fair enough. And I'm not asking you
24 to opine on what caused it. I'm asking about the
25 time frame.

09:09AM

1 through January/February and July/August.

2 So just kind of as a starting point, as a
3 brand launching, you line up to one of those key
4 time frames. The end of 2023 there was agreement
5 between Target and Family Hive that we would launch
6 in the July/August time frame to line up to the very
7 busy kind of back-to-school moment.

09:14AM

8 Q Is there a specific date that you consider
9 the launch date for the brand?

10 A Formal launch date is August 4th.

09:15AM

11 Q 2024?

12 A Correct.

13 Q I'm going to show you another document.

14 This is actually a portion of the pages from the
15 complaint. I'm not going to mark this as an
16 exhibit. I'm just going use it to kind of refer to.

09:15AM

17 Give me a moment to -- let me know when
18 you're able to see that.

19 A Yes. I just opened it.

20 Q Okay. Now, this is a couple of pages from
21 the complaint filed by Ms. Lively. This is actually
22 the Second Amended Complaint. So this one was filed
23 in July of 2025.

09:16AM

24 And at the bottom of Page 123, which is the
25 first page you see there, there's a Paragraph 342 --

09:16AM

1 case?

2 MR. BRUNO: Objection to form.

3 MS. CROWLEY: Objection to form.

4 THE DEPONENT: Can you restate the

5 question? What do you mean? 09:32AM

6 BY MR. KALTGRAD:

7 Q Do you have any information that any

8 defendant in this case caused somebody to put those

9 comments on any social media account for Blake

10 Brown? 09:32AM

11 MS. CROWLEY: Objection to form.

12 MR. BRUNO: Join.

13 THE DEPONENT: Yeah, I'm not -- I'm not

14 here to speak on in terms of what -- causation or

15 source. 09:32AM

16 What I observed in my -- in documented, in

17 my evaluation of the social media sentiment on the

18 brand was that there was an influx of negativity as

19 it pertains to Blake that flowed into our brand

20 handles starting in mid-August of 2024. 09:33AM

21 BY MR. KALTGRAD:

22 Q Okay. And if you look at the next sentence

23 it says, (as read):

24 "Many of the negative comments

25 on these businesses social media 09:33AM

1 "Instead, the Baldoni-Wayfarer

2 Astroturfing Campaign forced each of

3 Ms. Lively's businesses to go dark

4 on social media in August."

5 And we talked about that meant that you 09:37AM

6 stopped posting on social media; is that right?

7 MS. CROWLEY: Objection to form.

8 MR. BRUNO: Join.

9 THE DEPONENT: We did stop posting on

10 social media in mid-August. 09:37AM

11 BY MR. KALTGRAD:

12 Q And mid-August was -- mid-August was just
13 after the launch of the brand itself; is that right?

14 A Several weeks after, correct.

15 Q Okay. So about two weeks after the launch, 09:37AM
16 we're talking; is that about right?

17 A Correct.

18 Q Okay. So in the midst of this very
19 successful launch, as you described it, at Target,

20 Blake Brown made the decision to stop posting 09:38AM
21 content on social media; correct?

22 MS. CROWLEY: Objection to form.

23 MR. BRUNO: Join.

24 THE DEPONENT: We announce the brand on

25 July 31st and had tremendously positive reactions 09:38AM

1 from consumers across social media, traditional
2 media and then kind of in the form of sales at
3 Target.

4 The response was so overwhelmingly
5 positive. Starting mid-August, our social media 09:38AM
6 handles started being flooded with negativity
7 related to Blake, and largely not related to the
8 brand.

9 And the very big swing in terms of some of
10 those themes and comments that had not appeared in 09:39AM
11 the first few weeks of the launch was very -- was
12 very notable and obvious.

13 And, ultimately, as a new brand, so much of
14 your success is built on your reviews and your
15 social media presence. 09:39AM

16 So we reached a point where the negativity
17 was so great we were forced to go dark because the
18 sort of negativity of having those comments
19 outweighed the positivity of being able to continue
20 to market on social media. 09:39AM

21 BY MR. KALTGRAD:

22 Q Were the revenue numbers in August and
23 September better or worse than the Target
24 projections?

25 MS. CROWLEY: Objection to form. If you 09:39AM

1 Q Okay. If you look at Page 38, like I said,
2 which is - if you look at the bottom right, there's
3 Bates-stamped documents starting with BL. So this
4 one ends at 803.

5 Do you see that? 09:54AM

6 A Yes.

7 Q And there's a signature there for LOL HATA
8 LLC by Blake Lively as manager.

9 Do you see that?

10 A Yes. 09:54AM

11 Q Okay. And is it your understanding that
12 Blake Lively is the manager of LOL HATA LLC?

13 A I honestly don't know the ins and outs of
14 LOL HATA and its relationship to Blake.

15 Q Do you know if she's a member of LOL HATA? 09:55AM

16 A I don't have that information.

17 Q Okay. On Page 41, which is 806, there's a
18 signature for Blake Lively as manager of Family Hive
19 LLC.

20 Do you see that? 09:55AM

21 A I do.

22 Q And is that correct, that Blake Lively is
23 the manager of Family Hive LLC?

24 A I'm honestly not sure of what the like
25 origin or intention behind that is. She's obviously 09:55AM

1 incredibly well, even more so than the other
2 incredibly well-selling products.

3 And therefore, the ability to walk into any
4 Target and reliably be able to buy a mask became
5 challenging at times.

11:14AM

6 Q Were there any inventory supply problems
7 other than the fact they were being sold at a large
8 rate?

9 A No. Just that the sell through was so much
10 higher than even the high forecast Target provided.

11:14AM

11 Q And advance to Page 4 and that describes
12 how sales are outpacing Target's forecast; right?

13 A Correct.

14 Q And that "Target forecast" that's referring
15 to the projections that Target had made and provided
16 to you; right?

11:15AM

17 A Correct.

18 Q The last bullet point on this page says (as
19 read):

20 "Very limiting marketing
21 support."

11:15AM

22 What does that refer to?

23 A The kind of pieces of the brand is that,
24 you know, Blake and her credibility in hair would be
25 the single biggest marketing lever we have as a

11:15AM

Page 111

1 brand.

2 And so those early weeks were sort of
3 mid-August. We were relying, you know -- it was
4 here likeness that was helping to really drive
5 excitement, awareness and trial. 11:15AM

6 And then kind of haloing from that other
7 media coverage. But in terms of, you know, physical
8 investment and traditional digital marketing that
9 most brands would launch with, we were investing
10 very little. 11:16AM

11 Q Okay. So you were investing very little in
12 marketing support, but you were still outpacing
13 Target's forecast in the launch of sales; right?

14 MS. CROWLEY: Objection to form.

15 MR. BRUNO: Join. 11:16AM

16 THE DEPONENT: We were invested, you know,
17 in a limited fashion but in a way it was consistent
18 with the business plan.

19 BY MR. KALTGRAD:

20 Q If you look at Page 7 which is Bates stamp 11:16AM
21 278.

22 A Yes.

23 Q About the third bullet point from the
24 bottom says, (as read):

25 "Negative sentiment -- sentiment 11:17AM

Page 112

1 A Do I? No.

2 Q Do you have any reason to believe that the
3 negative posts identified caused a decrease in sales
4 of products?

5 MS. CROWLEY: Objection. 11:46AM

6 MR. BRUNO: Join.

7 THE DEPONENT: I mean, it typically isn't

8 -- you don't attribute one post to one -- well, I

9 don't know -- I don't know who posted that or the

10 cause of that post and in terms of the impact of 11:46AM

11 that specific post versus others we were fielding.

12 BY MR. KALTGRAD:

13 Q It's difficult for you to attribute

14 specific posts to a decrease in sales?

15 MS. CROWLEY: Objection; mischaracterizes 11:47AM

16 testimony.

17 THE DEPONENT: One specific post.

18 BY MR. KALTGRAD:

19 Q Look at Exhibit 16. Let me know when you

20 can see that, please. 11:47AM

21 A I can see it.

22 (Defendants' Exhibit 16 was marked

23 for identification.)

24 BY MR. KALTGRAD:

25 Q Okay. This is an October 31st, 2024, 11:47AM

1 e-mail from you to Blake [REDACTED]

2 That's Blake Lively?

3 A Correct.

4 Q Okay. And -- (as read):

5 "Hi, Blake. Wanted to share the 11:47AM

6 deck I put together for the team to

7 orient them on goals for the year

8 and what we need to accomplish in

9 the year to go."

10 Under 'Net Takeaways' it says (as read): 11:47AM

11 "375,000 to 400,000 current

12 weekly retail sales average. Note:

13 This may come down as we come off

14 national endcap."

15 What does the "national endcap" refer to? 11:48AM

16 A If you go into Target, there -- at the end

17 of the aisle, there's a display space that's called

18 an endcap. And so they have different endcaps they

19 feature -- different brands they feature on endcap

20 throughout the year. 11:48AM

21 Q And was there a time that Blake Brown

22 products were supposed to be on the endcap?

23 A They were on endcap when we launched,

24 August 4th through kind of mid-October-ish. It

25 takes -- Target puts a little -- it takes them time 11:48AM

1 to fully put up the endcap and fully take it down.

2 Sort of like mid- to end-October is when we started

3 to come off endcap.

4 Q Okay. And here you're telling Blake Lively

5 that the goal of 375 to 400 thousand weekly retail 11:49AM

6 sales might come down once the endcap period ends;

7 right?

8 A Yes. So I've had experiences in my past

9 where sales stayed the same and we called it endcap.

10 I've had experiences where they actually go up 11:49AM

11 because people tried the product. And there's

12 instances when sales come down because you lose that

13 visibility in the store.

14 Q I'm going to show Exhibit 17 now.

15 (Defendants' Exhibit 17 was marked 11:49AM

16 for identification.)

17 BY MR. KALTGRAD:

18 Q Let me know when you can see that, please.

19 Do you have that in front of you?

20 A I don't think -- all right. I've got it 11:50AM

21 now.

22 Q And do you recognize this as the attachment

23 to Exhibit 16?

24 A Yes.

25 Q Okay. This is a document that you 11:50AM

1 MR. KALTGRAD: And this is marked

2 "Attorneys' Eyes Only" just for the record.

3 BY MR. KALTGRAD:

4 Q Was it sent to anybody besides Blake

5 Lively's counsel? 01:01PM

6 A I don't believe so. I don't believe so.

7 Q Okay. Now, the second page compares the

8 2024 financial performance to the Deloitte business

9 plan; right?

10 A Correct. 01:02PM

11 Q And in 2024, the actual financials actually

12 outperformed the Deloitte business plan; right?

13 A Correct.

14 Q Now, the bottom --

15 A Correct. 01:02PM

16 Q Bottom bullet point says, (as read):

17 "As a matter of fact, the

18 negative impact of digital

19 manipulation generated an adverse

20 trend and is affecting ongoing 01:02PM

21 performance."

22 Do you know what's referred to by "digital

23 manipulation"?

24 A The negative media environment. I think

25 the point the bullet is making is that we out -- 01:02PM

1 overdelivered the Deloitte plan, but that was really
2 driven by the launch month and wasn't a consistent
3 performance throughout, you know, the September,
4 October, November, December.

5 Q The next page has a bullet point. It says, 01:03PM
6 (as read):

7 "The challenges faced by the
8 brand prevented the following key
9 actions that were anticipated in the
10 Deloitte business plan: one, growth 01:03PM
11 consolidation in Target; and, two,
12 international/other retails'
13 expansion."

14 When it says, "the challenges faced by the
15 brand," what is that referring to? 01:03PM

16 A The negative media environment.

17 Q How did that a prevent growth consolidation
18 in Target?

19 A We had built into the plan continued
20 momentum and growth even post-launch at Target. You 01:03PM
21 know, you have the launch period. But then as you
22 drive awareness of the brand and people try it, that
23 growth continues. And then, you know, from there,
24 there's good strong sales momentum that you can take
25 to other retailers and to international markets in 01:04PM

1 order to kind of sell in the brand.

2 Q So is this attributing the failure to -- or
3 the prevention of growth consolidation solely to the
4 negative media environment?

5 MS. CROWLEY: Objection; form. 01:04PM

6 MR. BRUNO: Join.

7 THE DEPONENT: It is attributing the media
8 environment as impacting our ability to grow at
9 Target, yes.

10 BY MR. KALTGRAD: 01:04PM

11 Q How would the negative media environment
12 prevent international and other retail expansion?

13 A Expansion requires two things: one, really
14 strong sales data. And as the performance sort of
15 weakened, that story, you know, was not there. And 01:04PM
16 then, two, maybe more importantly, positive media
17 environment.

18 Retailers are hesitant to partner if
19 there's any kind of media or negative media
20 environment because that can have blowback for them. 01:05PM

21 And so in outreach to Ulta as well as some
22 inter- -- key international players that we talked
23 about back, you know, in the Deloitte business plan
24 as we were talking about international expansion.

25 There was concern and -- around launching with the 01:05PM

1 brand given the negative media environment
2 surrounding Blake.

3 Q Well, can you give me a little more detail
4 on that? What -- what was said specifically from
5 Ulta regarding the negative media environment? 01:05PM

6 MS. CROWLEY: Objection to form.

7 MR. BRUNO: Join.

8 THE DEPONENT: That the media environment
9 was too controversial, and so it wouldn't be the
10 right time to launch with us. 01:05PM

11 BY MR. KALTGRAD:

12 Q When did that conversation take place?

13 A We kind of had discussions with them on an
14 ongoing basis, and that typically happens through
15 Give Back Beauty and their commercial arm. They 01:06PM
16 have existing relationships.

17 So those discussions, you know, started
18 happening last fall. And as recently as, you know,
19 last month I just checked in again.

20 Q Is there a specific contact at Ulta that 01:06PM
21 you communicate with?

22 A I checked in -- I go through Give Back
23 Beauty. But, typically, they're in touch with the
24 hair care buyer or leader that makes decisions on
25 bringing brands in. 01:06PM

1 Q And which, if any, international retailers
2 expressed that they did not want Blake Brown beauty
3 products due to a negative environment?

4 MS. CROWLEY: Objection to form.

5 MR. BRUNO: Join. 01:07PM

6 THE DEPONENT: Sephora in Europe. There's
7 an Australian vendor, "Something" Warehouse, that
8 said it was not interested in -- I think it's called
9 maybe Drug Warehouse. And then we had initial
10 discussion with kind of gauging interest with Boots 01:07PM
11 and with Douglas. And, ultimately, you know, there
12 wasn't an interest in pursuing partnership.

13 BY MR. KALTGRAD:

14 Q When did the discussion with Sephora occur?

15 A Sephora Europe, I believe the Give Back 01:07PM

16 Beauty team -- again, they talked to them on an
17 ongoing basis. So they were starting to ask
18 questions and gauge interest last fall and then
19 meeting in the spring, early summer, there was
20 another discussion where they definitely said it's 01:08PM
21 not the right time.

22 Q Do you know what specific communication was
23 made from Sephora?

24 MS. CROWLEY: Objection to form.

25 MR. BRUNO: Join. 01:08PM

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, Registered
3 Professional Reporter, Certified Live Note Reporter,
4 do hereby certify:

5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any witnesses in the foregoing proceedings,
8 prior to testifying, were duly sworn; that a record
9 of the proceedings was made by me using machine
10 shorthand which was thereafter transcribed under my
11 direction; that the foregoing transcript is a true
12 record of the testimony given.

13 Further, that if the foregoing pertains to
14 the original transcript of a deposition in a Federal
15 Case, before completion of the proceedings, review
16 of the transcript [] was [] was not requested.
17 I further certify I am neither financially
18 interested in the action nor a relative or employee
19 of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22 Dated: 09/30/2025

23 

24 RENE E A. PACHECO

25 CSR No. 11564 RPR, CLR

Page 206