

September 8, 2025

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

3 ---000---

4
5 STEPHANIE JONES, JONESWORKS
6 LLC,

7 Plaintiffs,

8 vs. CASE NO. 1:25-CV-00779-LJL

9 JENNIFER ABEL, MELISSA NATHAN,
10 JUSTIN BALDONI, WAYFARER
11 STUDIOS LLC,

12 Defendants.
13

14 VIDEO-RECORDED DEPOSITION OF TERA HANKS
15 Los Angeles, California
16 Monday, September 8, 2025
17
18
19
20
21
22

23 Stenographically Reported by: Ashley Soevyn,
24 CALIFORNIA CSR No. 12019
25

1 to the proceedings?

2 MS. ZELDIN: Vague and ambiguous.

3 Objection.

4 THE WITNESS: Can you please be more
5 specific?

6 BY MS. TAHLER:

7 Q Do you understand that Mr. Sarowitz has a
8 role in the Jones v. Abel case?

9 MS. ZELDIN: Objection.

10 THE WITNESS: I don't know.

11 BY MS. TAHLER:

12 Q Are you indemnified for your fees in
13 connection with your dep -- deposition and testimony
14 today?

15 A I don't know.

16 Q Are you paying for your legal fees today?

17 A No.

18 Q Do you know who is?

19 A Wayfarer, I believe.

20 Q Does Mr. Sarowitz have any role in that?

21 A Mr. --

22 MS. ZELDIN: Objection.

23 THE WITNESS: Mr. Sarowitz is the founder
24 and backer of the company. So I don't know how the
25 finances work related to our legal counsel.

1 refresh your recollection that the letter shared
2 with Ms. Abel was Ms. Lively's list, 17-point list
3 of protections?

4 A I don't know.

5 Q You can set that aside.

6 As president of Wayfarer, do you
7 supervise any employees?

8 A Yes. I help to manage the team in tandem
9 with Jamey Heath, our CEO.

10 Q And do you have discretion to make
11 decisions about company policy in your capacity as
12 president of Wayfarer?

13 A No.

14 Q You do not have discretion to make
15 decisions about company policy?

16 A No.

17 Q Is that authority that lies with
18 Mr. Heath?

19 A Yes.

20 Q Did you participate in negotiating
21 Ms. Lively's 17-point list?

22 MS. ZELDIN: Objection. No -- objection
23 to form.

24 MS. ROESER: I'll rephrase.
25

1 THE WITNESS: In my experience, talent
2 hires crisis when they feel they need that support.

3 BY MS. ROESER:

4 Q Did you have an understanding as to
5 whether Mr. Baldoni felt in July of 2024 that he
6 needed crisis support?

7 A Yes.

8 Q And what is your understanding of why
9 Mr. Baldoni felt that he needed crisis support in
10 July of 2024?

11 A We were concerned -- he was concerned
12 about the cast unfollowing him and not doing press
13 and promo in support of the film and that there
14 could be negative press about the film that could
15 take away from the success of the film.

16 Q Was he also concerned, to your knowledge,
17 that there would be negative press about him
18 individually?

19 A He was concerned about press -- negative
20 press for the film.

21 Q I don't think you answered my question.

22 Was Mr. Baldoni also concerned, to your
23 knowledge, that there might be negative press about
24 him individually, apart from the film?

25 A He was concerned when the cast unfollowed

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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;

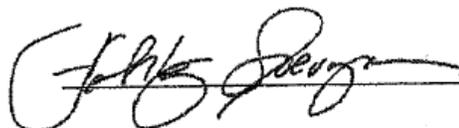
That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

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 9th day of September, 2025.



ASHLEY SOEVYN

CSR No. 12019