

56.1 Statement

**(This has Taylor Swift Quotes
through out, only included the
pages with Swift quoted or
referenced or text copy included)**

Plaintiff's Response 37: Undisputed that the quoted language appears in the cited source, but Lively respectfully refers the Court to the cited source for its complete contents and disputes any summary or interpretation inconsistent therewith.

38. On April 8, 2023, Lively sent Baldoni her proposed revisions to the “rooftop scene” in which the two main characters first meet. Ex. 36, BL-000009247 at -48.

Plaintiff's Response 38: Undisputed.

39. On April 12, 2023, Lively asked her friend, the world-famous musician Taylor Swift, for help. Referring to Baldoni as “this doofus director of my movie,” she went on to describe him as “a clown” who “thinks he’s a writer now.” She asked Swift to endorse the revised script she was proposing—even without having read it. Ex. 45, BL-000018765 (“you don’t have to read of course”).

Plaintiff's Response 39: Undisputed that the quoted language appears in the cited source, but disputed that Lively asked Taylor Swift to endorse the revised script without having read it. Ex. 281, Lively Tr. 241:3–242:23 (“And I sent Taylor the script on her way to my apartment because Justin was still there, and I asked her to read them. I told her she didn’t have to, I didn’t want her to feel pressured to do that, but I hoped that she would.”). Lively respectfully refers the Court to the cited source for its complete contents and disputes any summary or interpretation inconsistent therewith.

40. Swift agreed to do Lively’s bidding, texting Lively, “I’ll do anything for you !!” Ex. 45, BL-000018765. Lively and Taylor Swift met with Baldoni at Lively’s apartment, where Swift endorsed the revised draft. Afterward, Lively wrote to Swift: “You were so epically heroic today. I recapped every moment to Ryan. I kept remembering stuff- You making shit up about me

and lenses. And referring to yourself as my doll. This clown falling for all of it. But also resisting it. You are the worlds absolute greatest friend ever.” Ex. 46, BL-000018767.

Plaintiff’s Response 40: Disputed that Swift “agreed to do Lively’s bidding,” “met with Baldoni,” or “endorsed the revised draft,” which is not supported by the cited evidence. Wayfarer Ex. 46. Undisputed that the quoted language appears in the cited source, but Lively respectfully refers the Court to the cited source for its complete contents and disputes any summary or interpretation inconsistent therewith.

41. On April 14, 2023, Baldoni told Lively he liked the revised scene. He added that he “would have felt that way without Ryan and Taylor.” Ex. 47, BL-000009345 at -48. Lively explained that, to protect her like the princess in Game of Thrones, Reynolds and Swift serve as her “dragons.” Ex. 48, BL-000009349 at -50.

Plaintiff’s Response 41: Undisputed that the quoted language appears in the cited documents, but Lively respectfully refers the Court to the full documents for their complete contents, including that “we all benefit” from her relationship with Reynolds and Swift and “you will too, I can promise you.” Wayfarer Ex. 48 at BL-000009350.

42. Lively has since disclosed that her husband, Ryan Reynolds, actually wrote the revisions to the “rooftop scene” that she proposed. Ex. 49, WAYFARER_000142463 at -64; Ex. 50, BL-000011703.

Plaintiff’s Response 42: Undisputed.

43. Wayfarer has a set of industry-standard policies and procedures in place to prevent harassment, discrimination, and retaliation. Ex. 51, HEATH_000034943; Ex. 1, WAYFARER_000139049 (Wayfarer employee handbook). “All Wayfarer Studios employees, officers, principals, agents, workers, and representatives are prohibited from engaging in unlawful

130. Lively’s subsequent conduct confirms Baldoni’s account. In her “protections” demands, she objected to Baldoni referring to “personal times that physical consent was not given in sexual acts, as either the abuser *or the abused*.” Ex. 88, BL–000026031 (emphasis added). In a subsequent text exchange with Taylor Swift, Lively linked Baldoni’s comment about consent to an article in which Baldoni disclosed his experience as a victim of sexual abuse to the press. Ex. 89, BL–000021208.

Plaintiff’s Response 130: Undisputed that Lively objected to Baldoni referring to “personal times that physical consent was not given in sexual acts, as either the abuser *or the abused*” and that Lively shared an article with Swift about Baldoni. Disputed that “Lively’s subsequent conduct confirms Baldoni’s account” to the extent that it is inconsistent with the testimony of Lively’s security detail that during an April 2023 car ride from New York to New Jersey with Lively, Baldoni divulged to Lively that “women had forced themselves on him” and he had “forced himself on women” and did so “even when they said no or did not consent.” Exs. 28, Security Tr. 44:19–46:4; 46:12–47:9; 87:12–90:8; 92:23–93:10; 29.

131. On or about May 26, 2023, Lively and her baby contracted COVID on set. Ex. 90, BL–000011538.

Plaintiff’s Response 131: Undisputed.

132. Other cast and crew members also got COVID. Ex. 24, Lively Dep. Tr. 184:1–8.

Plaintiff’s Response 132: Undisputed.

133. Lively included her COVID exposure in her list of incidents that required “protections,” as discussed below, and also alleges it as part of her harassment claims. Ex. 88, BL–000026031; Ex. 3, SAC ¶109.

Plaintiff’s Response 133: Undisputed.

Plaintiff's Response 229: Disputed. The assertion that Lively made “extensive edits to the film, trailer, and poster” is argumentative and unsupported by the cited evidence. Wayfarer Ex. 132 reflects a text from Lively to Greenstein discussing the edit, and Wayfarer Ex. 133 reflects a text from Lively to Swift asking Swift to watch the trailer. Neither exhibit shows that Lively performed or directed extensive edits to any of these materials. Lively Decl. ¶ 33.

230. Lively told famous friends, including Matt Damon, Lucy Damon, and Ben Affleck that she “rewrote the script. I directed every actor.” Ex. 134, BL–000027070. She also did not hesitate to disparage Baldoni among her Hollywood crowd, describing him to Ben Affleck, for example, as a “chaotic clown.” See Ex. 135, BL–000027069 (“I ended up rewriting and restructuring the entire script, I also ended up having to direct the movie via the chaotic clown ‘director’/actor/producer/ financier/studio head at the center.”).

Plaintiff's Response 230: Undisputed that the quoted language appears in Wayfarer Ex. 134 and Wayfarer Ex. 135, but Lively respectfully refers the Court to the cited source for its complete contents and disputes any summary or interpretation inconsistent therewith.

231. Lively urged Hoover as well as her famous friends, including Matt Damon, Lucy Damon, Ben Affleck, Bradley Cooper, and Taylor Swift to support her version of the film over Baldoni's. Ex. 134, BL–000027070; Ex. 135, BL–000027069; Ex. 136, BL–000018825. For instance, in April 26, 2024 messages, Lively and Swift discussed a plan to use Swift's song in the film's trailer. Swift wrote: “If Justin was strategic He would be like no Taylor swift in the trailer Because that gives you more power over the film, that's your ally not his.” Lively responded: “You are so right...He should've run from your music...How stupid. This was his only shot at having the appearance of an upper hand.” Ex. 137, BL–000018810.

Plaintiff's Response 231: Undisputed that the quoted language appears in Wayfarer Ex. 134, Wayfarer Ex. 135, Wayfarer Ex. 136, and Wayfarer Ex. 137, but Lively respectfully refers the Court to the cited sources for their complete contents and disputes any summary or interpretation inconsistent therewith.

232. On May 30, 2024, Josh Greenstein, the President of Sony's Motion Picture Group, informed Lively that Baldoni's cut had scored higher than Lively's in audience testing. Lively responded: "Spoke with Colleen. She feels like I do, still full steam ahead w my cut. ... Colleen and I are declaring now, this is the cut. ... It's done from my perspective, from Colleen's, and from Taylor's. And from Sony's?" Ex. 138, BL-000019326.

Plaintiff's Response 232: Undisputed that the quoted language appears in Wayfarer Ex. 138, but Lively respectfully refers the Court to the cited source for its complete contents and disputes any summary or interpretation inconsistent therewith.

233. Lively also demanded changes to the film's credits, including moving up her name ahead of Heath's as a producer, changing the order of cast credits, contrary to existing contractual terms, and removing a credit stating that *It Ends With Us* was a "film by" Baldoni altogether. Ex. 139, BL-000019455; Ex. 140, SPE_WF0000641; Ex. 141, SPE_BL0022958; Ex. 8, Baldoni 10/7 Dep. Tr. 328:9-17 ("Lively had requested that my name be removed. So I had my "a film by" credit removed."); Ex. 142, Greenberg Dep. Tr. 138:2-19.

Plaintiff's Response 233: Disputed that Lively demanded anything; Lively made requests and they were granted. *Infra* Pl.'s Response ¶ 387. Undisputed that Lively proposed Baldoni remove his "film by" credit but disputed to the extent this paragraph suggests that doing so was inappropriate or that Baldoni did not waive his credit of his own volition. Wayfarer Ex. 142 at Tr. 138:2-19.

working through scenario planning with us to be armed if needed.” Ex. 166, JONESWORKS_00030156.

Plaintiff’s Response 258: Undisputed that the quoted language appears in the cited source, but disputed that Nathan did not have communications outside of the internal Wayfarer team, as she reported speaking to her contacts at the Daily Mail and DeuxMoi as early as August 4, 2024. Ex. 50; Wayfarer Ex. 228.

259. Wayfarer hired TAG and Nathan on August 2, 2024. Ex. 167, JONESWORKS_WAYFARER_000003009.

Plaintiff’s Response 259: Undisputed.

260. On August 2, 2024, TAG circulated a “Scenario Planning” document listing a series of possible options for responding to the public relations crisis facing Baldoni and Wayfarer. Ex. 168, NATHAN_000005497. Nathan has testified that document was not an approved action plan, but only a preliminary document for the purposes of “scenario planning,” with each suggestion being only “a possibility. This is not definitive.” Ex. 169, Nathan 9/29 Dep. Tr. at 111:18-112:4 (“[T]his is scenario planning. So this is a possibility. This is not definitive.”).

Plaintiff’s Response 260: Undisputed, except that evidence suggests certain options set forth in the Scenario Planning Document were indeed acted upon, such as, for example, (1) “giving a friendly reporter who is covering the film a simple line hinting that [] you and Blake . . . ‘had our differences,’” to “tee[] up reporters properly that there were issues with her,” Exs. 54; 53, and (2) “planting stories about the weaponization of feminism and how people in BL’s circle like Taylor Swift, have been accused of utilizing these tactics to ‘bully’ into getting what they want,” Ex. 55. When discussing the contents of the Scenario Planning Document, Nathan told Abel: “when we send over documents we can’t send over the work we will or could do because

“wardrobe,” and “[h]aving to hire an extra producer,” which are ordinary expenses and costs associated with a film production and were not as a result of Lively’s conduct. Exs. 11, Sarowitz Tr. 229:13–230:6; 13, Baker Tr. 52:3–13, 53:4–7 (leading actress creative input on wardrobe is normal); 76 (meeting between Baldoni and Ms. Lively regarding wardrobe); 31 (Heath stating “we got shut down for covid”); 15, Saks Tr. 89:1–92:16 (terminating first assistant director was appropriate because of performance). The “cost” also ignores the massive, record-breaking nature of the success of the film, which Sony and others attributed to Lively. Exs. [], Giannetti Tr. 342:10–344:3; [], Greenstein Tr. 24:15–26:2; [], Saks Tr. 165:17–166:15.

336. As a result of this litigation, the Wayfarer Foundation—the charitable arm of Wayfarer Studios—received threats, prompting the need for security. Sarowitz and his family members have also personally received death threats. An arson was even carried out at Sarowitz’s home and someone threatened Sarowitz’s daughter’s life. These events in part prompted Sarowitz and the Board of the Wayfarer Foundation to wind down the foundation. Ex. 6, Sarowitz Dep. Tr. 48:5-17, 52:1-21, 53:1-20, 352:9-11.

Plaintiff’s Response 336: Undisputed as to the substance of Sarowitz’s testimony, but disputed that this litigation foreseeably caused the threats and that Sarowitz shared all reasons for shutting down the Wayfarer Foundation. Ex. 11, Sarowitz Tr. 46:20–47:8.

337. In or about August 2024, Baldoni’s former publicist, Stephanie Jones, and Lively connected through a mutual acquaintance to share and discuss information that Jones had found on Abel’s personal phone. Ex. 24, Lively Dep. Tr. at 147:11-20; *see also* Ex. 247, BL-000021190 at -192 (Taylor Swift: “Can you believe she just called and was like this pr chick wants to get info to blake”).

“smear campaign” against Lively. *Id.* *The New York Times* article included a link to Lively’s California state administrative complaint, which had been filed the previous day. *Id.*

Plaintiff’s Response 346: Undisputed and Lively respectfully refers the Court to the cited source for its complete contents and disputes any summary or interpretation inconsistent therewith.

347. On December 4 and 5, 2024, Lively and Taylor Swift privately discussed the forthcoming *New York Times* article. Swift wrote: “I think this bitch knows something is coming because he’s gotten out his tiny violin.” Ex. 89, BL–000021208 at –210.

Plaintiff’s Response 347: Disputed. The evidence cited does not support Defendants’ assertion that “[o]n December 4 and 5, 2024, Lively and Taylor Swift privately discussed the forthcoming *New York Times* article.” Undisputed that the quoted language appears in the cited source, but Lively respectfully refers the Court to the cited source for its complete contents and disputes any summary or interpretation inconsistent therewith. Wayfarer Ex. 89 at BL-000021210.

348. Through the administrative complaint she provided, Lively and/or her agents told *The New York Times* and other media that Baldoni had “abruptly pivoted away” from the agreed–on marketing for the film to emphasize his support for survivors of domestic violence. Ex. 252, CRD ¶ 7. That statement is false. *See* Ex. 253, BALDONI_000030667 (cover email to Sony); Ex. 254, BALDONI_000030668 (IEWU initial campaign concepts).

Plaintiff’s Response 348: Undisputed that Lively’s CRD complaint alleges that “[i]n the days leading up to the Film’s release, Mr. Baldoni abruptly pivoted away from the Film’s Marketing Plan and the types of publicity activities in which he had previously participated . . . in an effort to explain why many of the Film’s cast and crew had unfollowed Mr. Baldoni on social media and were not appearing with him in public,” *see* Wayfarer Ex. 252 at ¶ 7, and Lively

- c. “When BL wasn’t able to get her way on set or behind the scenes, she involved her husband to create an imbalance of power between her and JB. RR went so far as to use his power to call agents and agencies, Sony, and other key players so that BL would get her way.” *Id.*
- d. “BL’s less than favorable reputation in the industry spans decades and has been reported –there were issues on Gossip Girl, the Town, A Simple Favor, and more.” *Id.*
- e. “There is a clear, likely motive due to the film’s value and fanbase, in which BL is attempting to bully her way into buying the rights for It Starts With Us.” *Id.*

688. The Scenario Planning document also suggested that the TAG “team can also explore planting stories about the weaponization of feminism and how people in BL’s circle like Taylor Swift, have been accused of utilizing these tactics to ‘bully’ into getting what they want.” *Id.* at NATHAN_000005506.

- ii. Abel And TAG Avoid Putting In Writing How They Will “Bury” Lively

689. After reviewing the Scenario Planning document, Baldoni told Abel: “Not in love with the document they sent — Not sure I’m feeling the protection I felt on the call.” Ex. 195 at BALDONI_000016442.

690. Abel then texted Nathan that Baldoni “wants to feel like she [Lively] can be buried...” Ex. 47 at NATHAN_000005552.

691. Nathan sent the following messages in response:

- a. “Of course- but you know when we send over documents *we can’t send over the work we will or could do because that could get us in a lot of trouble.*” *Id.* (emphasis added).
- b. “We can’t write it down to him. *We can’t write we will destroy her.* We will go to this. We will do this. We will do this. We will do this.” *Id.* at NATHAN_000005553 (emphasis added).
- c. “Imagine if a document saying all the things that he wants ends up in the wrong hands.” *Id.* at NATHAN_000005554.

film.” Ex. 55 at JONESWORKS_00016354. That is, Baldoni would “win” as it wouldn’t seem as if he was attacking Lively, but Lively still “will hate” the article. *Id.*

756. That same day, Case emailed the Daily Mail reporter with “helpful” links comparing Lively to Taylor Swift. Ex. 56.

757. On August 17, 2024, the Daily Mail published the article,⁵ which incorporated the links Case had provided and reported that, according to an insider, “‘Blake is trying to get Taylor to help pull her out of this mess by using their friendship for interviews and other promotional work directly related to the film amid the current backlash that she is getting’” and that Lively “laughed at the concept of making herself available to” domestic violence survivors. It further reported: “The source told DailyMail.com that ‘Blake thinks she’s getting set up by people around Justin so he doesn’t have to come clean about his behavior’ on set. . . . ‘Instead of cementing her as a movie star it has served only to show out of touch she is.’”

758. On August 15, 2024, Koslow spoke to Tatiana Siegel from Variety regarding publishing an article that focused on the union violations that allegedly occurred on the set of the Film by virtue of Reynolds working on the script during the WGA strike, and replacement editors being brought in to re-cut the Film. Ex. 231 at JONESWORKS_00013335. Again, Ms. Koslow focused on the fact that the placement would be “hands off” and was not akin to “some bigger takedown . . . which could backfire.” *Id.*; Ex. 232 at BBKOSLOW-000006070. On August 27, Variety published the article, which claimed that “Reynolds’ involvement [in *It Ends With Us*] raises . . . WGA issue[s].”⁶

⁵ Lillian Gissen, *How Blake Lively COPIED Best Friend Taylor Swift to Promote It Ends With Us*, Daily Mail (Aug. 17, 2024) <https://www.dailymail.co.uk/tvshowbiz/article-13750525/blake-lively-taylor-swiftcopied-friendship-justin-baldoni-drama.html>.

⁶ Rebecca Rubin, Tatiana Siegel, “*It Ends With Us*” Sequel in Doubt Amid Blake Lively-Justin Baldoni Feud: “There’s Probably No World Where They Work Together Again,” Variety (Aug. 27, 2024), <https://variety.com/2024/film/news/it-endswith-us-sequel-in-doubt-blake-lively-justin-baldoni-feud-1236114099>.

she used these allegations of bullying to try and leverage her position so she could be the de facto director in the case.”¹⁹

ii. Defendants File Their Retaliatory Lawsuit And Continue Defaming Lively In the Press

803. On January 16, 2025, the Wayfarer Parties filed a complaint against Lively, Reynolds, Sloane and Vision PR. Case No. 1:25-cv-00449 (the “Wayfarer Action”), ECF. No. 1.

804. The Wayfarer Action complaint brought claims of civil extortion, defamation, false light invasion of privacy, breach of implied covenant of good faith and fair dealing, intentional interference with contractual relations, intentional interference with prospective economic advantage, and negligent interference with prospective economic advantage seeking at least \$400,000,000 in damages. *Id.*

805. That same day, Ms. Nathan and Mr. Freedman worked with their “true loyal friend,” Elizabeth Rosner of People Magazine, to place at least eight articles which were favorable to Mr. Baldoni. Ex. 254. The articles published that day, which were sent directly to Freedman and Nathan by Roeser, included ones which reported that:

- a. Lively had compared herself to the *Game of Thrones* character Khaleesi and referred to Reynolds and Swift as her “dragons,”²⁰
- b. Lively attempted to use Swift and Reynolds to pressure Baldoni into accepting a rewrite of a key scene in the script,²¹

¹⁹ Megyn Kelly, How the New York Times Colluded with Blake Lively, According to Justin Baldoni Lawyer Bryan Freedman (Jan. 7, 2025), <https://www.youtube.com/watch?v=XIfFOdAk02U> at 6:56.

²⁰ Benjamin VanHoose, *Justin Baldoni Claims Ryan Reynolds and Taylor Swift Pressured Him to Accept Blake Lively’s It Ends With Us Rewrite: Complaint*, People (Jan. 16, 2025), <https://people.com/justin-baldoni-claims-blake-lively-ryan-reynolds-taylor-swift-pressured-him-8775745>; Jen Juneau, *Blake Lively Compared Self to Khaleesi in Alleged Texts to Justin Baldoni, Called Ryan Reynolds, Taylor Swift Her Dragons: Complaint*, People (Jan. 16, 2025), <https://people.com/blake-lively-compared-herself-to-khaleesi-in-texts-to-justin-baldoni-lawsuit-8776041>.

²¹ *Id.*

1245-20

**Sender/ Receipt not available is
Taylor Swift**

“I’ll do anything for you”

Exhibit 45

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 9	Date Range: 4/12/2023

Outline of Conversations



BL-FullMessages-0803785 • 9 messages on 4/12/2023 • Sender/Recip Name Not Available

• ?B?

Messages in chronological order (times are shown in GMT -04:00)



BL-FullMessages-0803785

#

?B? [REDACTED]

◀ 4/12/2023, 1:20 PM

If you get here w this doofus director of my movie is still here (I'll be ushering him out, but hope he's still here) can you do me a huge favor. I need help with him.

Can you tell him you're excited for the movie. That you read the book but what you're freaking out over is the pages I sent you. What a magnetic scene that is. Or whatever descriptives you're comfortable w. I'll send you the scene. You don't have to read of course. It's a quick read.

He's a clown and thinks he's a writer now and got this rewrite and told me he appreciates my passion. That's. It.

So having the greatest living story teller unknowingly echo to him how much you love what we're doing, (giving him credit as if he wrote them with me) will go such a long way

#

?B? [REDACTED]

◀ 4/12/2023, 1:20 PM

You dug a movie out of a grave once already for me. 🧑🧑❤️

#

?B? [REDACTED]

◀ 4/12/2023, 1:21 PM

Attached URL: <https://p33-content.icloud.com/M02B81C2D86B64F374D121E4DF173CBF519565605D0D4047AFACB88ED06F46114.C01USN00>

Attachment Title: LILY&RYLE.pdf

SA

Sender/Recip Name Not Available [REDACTED]

▶ 4/12/2023, 1:38 PM

I'll do anything for you !!

#

?B? [REDACTED]

◀ 4/12/2023, 1:51 PM

I love you thank you!!! Text me when you're on your way. I'll have molly meet you and security in garage

SA

Sender/Recip Name Not Available [REDACTED]

▶ 4/12/2023, 3:01 PM

Headed your way !

SA

Sender/Recip Name Not Available [REDACTED]

▶ 4/12/2023, 3:01 PM

I'm on your street

#

?B? [REDACTED]

◀ 4/12/2023, 3:02 PM

See you soon

#

?B? [REDACTED]

◀ 4/12/2023, 3:02 PM

Sophia headed down now

1245-21

**Taylor Swift “making up” stuff and
Referring to herself as Blake Lively’s
“doll”**

Aladdin gif (JB)

Exhibit 46

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 7	Date Range: 4/12/2023

Outline of Conversations



BL-FullMessages-0803811 • 7 messages on 4/12/2023 • Sender/Recip Name Not Available

██████████ • ?B? ██████████

Messages in chronological order (times are shown in GMT -04:00)**BL-FullMessages-0803811**

#

?B? [REDACTED]

◀ 4/12/2023, 8:40 PM

You were so epically heroic today. I recapped every moment to Ryan. I kept remembering stuff—You making shit up about me and lenses. And referring to yourself as my doll. This clown falling for all of it. But also resisting it. You are the worlds absolute greatest friend ever. I won the lottery.

> SA

Sender/Recip Name Not Available [REDACTED]

▶ 4/12/2023, 8:44 PM

I WON THE LOTTERY. You are the COOLEST PERSON IN THE WORLD and you like me !!

> #

?B? [REDACTED]

◀ 4/12/2023, 8:47 PM

Attached URL: [https://p47-](https://p47-content.icloud.com/M02B81C2D86B64F374D121E4DF173CBF519565605D0D4047AFACB88ED06F46114.C01USN00)

content.icloud.com/M02B81C2D86B64F374D121E4DF173CBF519565605D0D4047AFACB88ED06F46114.C01USN00

Attachment Title: tmp.gif



Image: tmp.gif (472 KB)

#

?B? [REDACTED]

◀ 4/12/2023, 8:41 PM

The most bonkers part to me is him saying to you he doesn't know pop culture made me more mad than anything he's done to me.

#

?B? [REDACTED]

◀ 4/12/2023, 8:44 PM

His entire brand is disassembling toxic masculinity. He monetizes it. He does TED talks!! But says that to you. Not only is it so rude but it's untrue. The thing that enraged me is you are in an absolute league of your own in being both the most popular artist alive and one of all time, but also the most respected and awarded.

Popularity doesn't normally coincide with laurels.

In very few cases it does.

Steven Spielberg for example. There's one.

Do you think for a moment he would've felt comfortable saying that to him. Even if he didn't know his work.

You would never make a point to say to Steven Spielberg about his work that you don't know it bc you don't know pop culture.

#

?B? [REDACTED]

◀ 4/12/2023, 8:47 PM

I've been raging ever since. Even though I know it all comes from what you said perfectly— he just so wants to be in the room but has to act like he doesn't.

I see it. I understand that it's Opposite Day with him. He's so green he thinks that's what makes him cool enough to fit in when in fact it's fucking enthusiasm, fandom and respect for those killing it that shows you're confident with where you are in life.

#

?B?

◀ 4/12/2023, 8:51 PM

I've also been raging at the NYU thing.

I honestly want to retroactively take you out to dinner to celebrate that. You deserve to be studied. You are a human masterclass. Fuck. Yes. They see it.

I've been digging up hatchets. I'll stop now

I love you and r and my babies and get more protective about your hearts than mine sometimes. I'm so much less forgiving when it comes to someone messing with someone I love than when someone messes w me

I'm done. I just love you and am so ecstatic for you. And grateful to you for today. That was stupid fun. 😊

1245-44

**Lively feeling “too needy” asking
Taylor Swift if “everything okay”**

**Taylor Swift feels like she’s getting
“corporate emails” from Lively**

Exhibit 89

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 33	Date Range: 12/4/2024 - 12/5/2024

Outline of Conversations



BL-FullMessages-0205041 • 33 messages between 12/4/2024 - 12/5/2024 • Taylor _ [REDACTED]
• ?B? [REDACTED]

Messages in chronological order (times are shown in GMT -05:00)



BL-FullMessages-0205041

#

?B? [REDACTED]

◀ 12/4/2024, 8:14 PM

Hey, just checking in. I have no reason to ask, but I donno, I've been feeling like I should... is everything ok? I felt like a bad friend lately because I was such a sad sack who only talked about my own shit for months. You were generous to not only be the key person there for me during all of it, but also to let me off the hook for being so in it. But I still have a feeling something may not be right. I told Ryan. He said to just ask you. But I felt so stupid and like it sounded needy and awkward for everyone, especially bc I can't explain why I have this feeling. And you know I have toxic masculinity so I can't be needy 😊. But also, I do want to know everything is good so I'm asking. I always want the opportunity to be a better friend if there's something I unintentionally did. I know how busy and taxed you are - physically, emotionally, practically, so I don't expect any more from you ever. Just want to make sure all is good ❤️❤️❤️

T

Taylor_ [REDACTED]

▶ 12/4/2024, 9:42 PM

No you're not wrong, but it's also not a big deal. I think I'm just exhausted in every avenue of my life and in recent months had been feeling a little bit of a shift in the way you talk to me. Yes there has been a lot of the Justin stuff but I've been through things like this before and I know how all consuming it is. It's more like... and I feel really bad saying anything about this because your texts have been so nice in their intent but your last few... it's felt like I was reading a mass corporate email sent to 200 employees. You said the word 'we' like 18 times. And it feels awful to be in any way critical of any way you process what you've been going through but I just kinda miss my funny, dark, normal-speaking friend who talks to me as herself, not like A plural unit. When it's a group I'm hearing from, I feel distanced from you even more than we are geographically.

Redacted - Non-Responsive

Redacted - Non-Responsive

Redacted - Non-Responsive And I know you feel attacked from all sides for ridiculous reasons so you're feeling like you have to overly explain things or be overly nice or whatever but. It's me! That's just caused a little distance! Redacted - Non-Responsive

Redacted - Non-Responsive

Redacted - Non-Responsive

And you don't need to apologize. Just come back please. 🙏

#

?B? [REDACTED]

◀ 12/5/2024, 1:58 AM

Dear Valued Customer,

Thank you for your feedback. We at headquarters are reviewing your concerns and will get back to you in a timely manner.

For real though. You're right. I literally deleted the awful thing I was gonna end that bit with because I've become digitally paranoid. I don't know if you experienced that with phone calls after what happened to you, but after the thousands of text messages that weren't meant for me that I've been reading, I've internalized that everything digital may be public. I say that knowing it's irrational. But my brain can't accept rationale there. So yeah, I've been texting like I'm writing. Not like me talking. I didn't realize that until you pointed it out, but I see it.

On top of that, I'm over packaging simple things bc I've felt so I deeply misunderstood that I don't trust my judgement of myself anymore. That sounds over the top but it's true. This fucking guy and what he did to me gave me an identity crisis. Legitimately.

The thing that spooked me most in all this though, wasn't the bad guys being bad guys, it was the good guys, my lifelong friends -allies to women- who quietly dipped. And so I'm probably being over the top with my friends who stayed because I've never felt more alone.

The track is very violin heavy. I hate it.

Point is, I'm being a stupid paranoid weirdo and felt it but didn't know where or how or when, so thank you for telling me and for saying I don't need to apologize and for not making it a big deal. But I am sorry. To you. And I'm sorry to me and to our kids. Fuck that guy and fuck his whole gaggle of supervillains.

You've got enough on you. You don't need to write back to all this. Just letting you know I see it now. And thank you. I'm excited for you to be done with suitcases, constant sinus infections and torn up kneecaps. So close.

Your submission will be processed shortly. We thank you again for your patronage.

Blakel Inc.

T Taylor _ [REDACTED] 12/5/2024, 2:01 AM
First paragraph took me OUT

?B? [REDACTED] 12/5/2024, 2:03 AM
If only I sent you the unplugged version. 🐼

?B? [REDACTED] 12/5/2024, 2:30 AM
I sent you a voice memo but it doesn't show on our thread. Which is really helping my case of not trusting phones 🤔📱
did it go through?

T Taylor _ [REDACTED] 12/5/2024, 2:31 AM
Yes! I'm just falling asleep but will listen tomorrow! Love you

?B? [REDACTED] 12/5/2024, 2:31 AM
It's the length of a mini series. Sleep.

?B? [REDACTED] 12/5/2024, 2:32 AM
Xx love you

T Taylor _ [REDACTED] 12/5/2024, 3:15 PM
I think this bitch knows something is coming because he's gotten out his tiny violin

Attached URL: <https://p28-content.icloud.com/MY4E4F33D60F6FBDF19A797122EF77A09DFDA48853F6F92F189A3DEB25B78F1F3A.21F788CE698EE1A9.C01USN00Attachment> Title: IMG_3326.jpg



people Justin Baldoni struggled for years after being sexually traumatized by an ex-girlfriend.
On a wide-ranging episode of 'Elizabeth Day's How to Fail' podcast that debuted Dec. 4, the 'It Ends With Us' director-actor, 40, spoke publicly for the first time about being diagnosed with ADHD as an adult this year, among other topics. More on this in our bio link. | Getty

Image: IMG_3326.jpg (1 MB)

?B? [REDACTED] 12/5/2024, 3:21 PM
It's rings different when he doesn't end the story by saying "Did I always listen when they said no? No." like he did with me. But that must not've tested well in the focus group.

?B? [REDACTED] 12/5/2024, 3:21 PM
He's being honored at the vital voices for women event on Monday.

T Taylor _ [REDACTED] 12/5/2024, 3:22 PM
This is so disgusting and I hate that he's clever about this shit

?B? [REDACTED] ◀ 12/5/2024, 3:22 PM
This inspiring event celebrates men who are using their platforms, influence, and leadership to elevate women, combat gender-based violence, and promote gender equality worldwide.

T Taylor _ [REDACTED] ▶ 12/5/2024, 3:22 PM
Well not him, her

?B? [REDACTED] ◀ 12/5/2024, 3:23 PM
He's not. He just has a team. Yeah. Her. And his publicist Jennifer Abel.

?B? [REDACTED] ◀ 12/5/2024, 3:23 PM
And the comms people at his studio.

T Taylor _ [REDACTED] ▶ 12/5/2024, 3:23 PM
He needs to be beaten by his OWN words

?B? [REDACTED] ◀ 12/5/2024, 3:23 PM
Everyone weighs in before we responds to a text, writes and email, or trims his hair. It's wild everyone participates.

?B? [REDACTED] ◀ 12/5/2024, 3:25 PM
Yeah. I actually think it's important he's honored. And to all the people honoring him and not taking a moment to question... no one talks to him, no one will say his name, no one follows him, yet they all are close with each other.. maybe it was him? Nahh it was the women because they wore flowers. That's how you know.

T Taylor _ [REDACTED] ▶ 12/5/2024, 3:25 PM
Jesus Christ

T Taylor _ [REDACTED] ▶ 12/5/2024, 3:28 PM
Is everything still on track

?B? [REDACTED] ◀ 12/5/2024, 3:38 PM
Oh yes.

?B? [REDACTED] ◀ 12/5/2024, 3:38 PM
A week later tho

?B? [REDACTED] ◀ 12/5/2024, 3:38 PM
But worth the wait

T Taylor _ [REDACTED] ▶ 12/5/2024, 3:38 PM
Ok that's perfect

T Taylor _ [REDACTED] ▶ 12/5/2024, 3:38 PM
His own words, that's gonna be powerful

?B? [REDACTED] ◀ 12/5/2024, 3:39 PM
That's what wild about this entire thing. Everything is in their own words.

T Taylor _ [REDACTED] ▶ 12/5/2024, 3:40 PM
It's the only way to beat liars and hypocrites

?B? [REDACTED] ◀ 12/5/2024, 3:42 PM
Can you imagine feeling as confident as these predators that you're going to always get away with it. Him accepting an award as an ally for women.
And Scooter going about he world with his head held high as he co owns and funds a crisis PR company that silences women m.

T Taylor _ [REDACTED] 12/5/2024, 3:42 PM
It's like a horror film no one knows is taking place

># ?B? [REDACTED] 12/5/2024, 3:44 PM
Oh but they will. It's the only thing that can come of this. The good that protects other women from this happening to them

?B? [REDACTED] 12/5/2024, 3:43 PM
Meanwhile I walk around feeling death sentence guilty and apologetic for being sarcastic and liking a theme party

1245-78

**Taylor Swift says “No one. Should
Ever. Get in a war of wills with you”**

**Lively talks about Matt Damon and
wife, and Bradley Cooper being Hero**

Exhibit 136

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 7	Date Range: 5/19/2024

Outline of Conversations



BL-FullMessages-0808402 • 7 messages on 5/19/2024 • Sender/Recip Name Not Available

<+ [REDACTED] • ?B? <+ [REDACTED]

Messages in chronological order (times are shown in GMT -04:00)**BL-FullMessages-0808402**

- # ?B? <[REDACTED]> ◀ 5/19/2024, 11:13 AM
Btw I have SO much to tell you. The author Colleen reached out to me because Justin is on an internal smear campaign trying to get his edit through. She was horrified. And reached out on her own to talk to me. Turns out he fucking lied, she's not Bahai. Never has been. She's not friends with him at all. She actually hates him. She was his safety net all along. Meanwhile he shut her out and wouldn't include her in anything and told her she had no voice or value yet paraded her around in front of cameras for goodwill and told us all that all his decision he got pushback on were her ideas.
- # ?B? <[REDACTED]> ◀ 5/19/2024, 11:13 AM
Wilddddd
- # ?B? <[REDACTED]> ◀ 5/19/2024, 11:13 AM
She flew to ny where I screened my cut for the first time yesterday. It KILLED in the room
- # ?B? <+ [REDACTED]> ◀ 5/19/2024, 11:15 AM
Bradley came. He watched it twice. He has been an absolute fucking hero. He has made me feel so good about the cut. Matt and Lucy Damon saw it to give notes and instead just wrote Tom Rothman to try to push my edit through without a bake-off with Justin. Which is also what Colleen is pushing for. It's wild and crazy times
- SA Sender/Recip Name Not Available <+ [REDACTED]> ▶ 5/19/2024, 11:16 AM
No one. Should ever. Get into a war of wills with you
- SA Sender/Recip Name Not Available <+ [REDACTED]> ▶ 5/19/2024, 11:16 AM
And I'm so excited to see it
- # ?B? <+ [REDACTED]> ◀ 5/19/2024, 11:58 AM
Any time if you have free time I'll send it to you!! It's actually a fun watch now

1245-79

**Taylor Swift Text “Welcome to
Hollywood Justin”**

**Blake Lively “never felt more like a
Khaleesi”**


**Taylor Swift okay with being a
dragon and firing text via Brother
Austin Swift at Lively “muttering
‘dracarys’”**

Exhibit 137

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 20	Date Range: 4/26/2024

Outline of Conversations

 **BL-FullMessages-0808218** • 20 messages on 4/26/2024 • Sender/Recip Name Not Available

* ?B? *

Messages in chronological order (times are shown in GMT -04:00)**BL-FullMessages-0808218**

- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 9:56 PM
OH MY GOD I just saw the above text and link
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 9:56 PM
Gonna watch now
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 9:59 PM
OH MY GOD
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 9:59 PM
ITS AMAZING
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 9:59 PM
I'm so sorry I was in a daze and didn't see the first text
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 10:00 PM
Wow I love how they use the song
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 10:27 PM
🤔 welcome to Hollywood Justin
- Attached URL: <https://p38-content.icloud.com/M5414ADED41DF5A8D8E7F3E2A7A8FD59FB2E3CFE9150F3C762F052275652D891C.C01USN00>
Attachment Title: Screenshot 2024-04-26 at 7.27.02 PM.heic
- Attachment: Screenshot 2024-04-26 at 7.27.02 PM.heic (85 KB)*
- ># ?B? [REDACTED] 4/26/2024, 10:28 PM
I'm not ok
- ># ?B? [REDACTED] 4/26/2024, 10:28 PM
I can't breathe
- ># ?B? [REDACTED] 4/26/2024, 10:28 PM
I'm obsessed with you
- ># ?B? [REDACTED] 4/26/2024, 10:30 PM
I have never felt more like Khalessi. I have dragons.
- ># ?B? [REDACTED] 4/26/2024, 10:30 PM
Except my dragons are bred with Cersei herself.
- > SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 10:45 PM
I'm just picturing you muttering 'dracarys'
And then I fire off those texts to Austin. 🌿🔥
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 10:47 PM
By the way
- SA Sender/Recip Name Not Available [REDACTED] 4/26/2024, 10:47 PM
If Justin was strategic

SA Sender/Recip Name Not Available [REDACTED] ▶ 4/26/2024, 10:47 PM
He would be like no Taylor swift in the trailer

SA Sender/Recip Name Not Available [REDACTED] ▶ 4/26/2024, 10:47 PM
Because that gives you more power over the film, that's your ally not his

># ?B? [REDACTED] ◀ 4/26/2024, 11:50 PM
Get yourself a best friend who thinks like the actual Roman Empire.

SA Sender/Recip Name Not Available [REDACTED] ▶ 4/26/2024, 10:48 PM
His misogyny runs so deep he thinks women are incapable of winning chess matches or making long game power plays

># ?B? [REDACTED] ◀ 4/26/2024, 11:53 PM
You are so right. And so wickedly smart to call it. He should've run from your music. I never thought about that. But holy shit. How stupid. This was his only shot at having the appearance of an upper hand.

1245-162

**Taylor Swift, Ryan Reynolds (Roy
Orbison) and Blake Lively chat
about “cancellation being reversed”**


Reference to Ashley Avignone


Exhibit 247

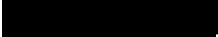
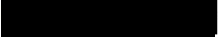
Short Message Report


Conversations: 1	Participants: 3
Total Messages: 18	Date Range: 12/21/2024

Outline of Conversations



BL-FullMessages-0204807 • 18 messages on 12/21/2024 • Taylor _

Orbison • ?B?

• 

Roy

Messages in chronological order (times are shown in GMT -05:00)



BL-FullMessages-0204807

- T Taylor _ [REDACTED] ► 12/21/2024, 7:20 PM
You won
- T Taylor _ [REDACTED] ► 12/21/2024, 7:20 PM
You did it
- # ♥ Roy Orbison ♥ [REDACTED] ► 12/21/2024, 7:20 PM
It's turning.
- T Taylor _ [REDACTED] ► 12/21/2024, 7:20 PM
https://deadline.com/2024/12/justin-baldoni-dropped-wme-blake-lively-sexual-harassment-complaint-1236240243/Attachment Title: 6550374B-A78E-4755-AD06-776880AA2035.pluginPayloadAttachment Attachment Title: 2766870F-4269-4FB1-87C5-7ABA520A65A6.pluginPayloadAttachment Attachment Title: DD9C0A84-1817-4B8B-94CE-EB25725876EF.pluginPayloadAttachment Attachment Title: 4AD4624D-430D-4371-9ABB-8C90D06BB504.pluginPayloadAttachment Attachment Title: 190A9988-64BC-488B-9AA9-C82413F939D2.pluginPayloadAttachment
- Attachment: 6550374B-A78E-4755-AD06-776880AA2035.pluginPayloadAttachment (4 KB)
- Attachment: 2766870F-4269-4FB1-87C5-7ABA520A65A6.pluginPayloadAttachment (194 KB)
- Attachment: DD9C0A84-1817-4B8B-94CE-EB25725876EF.pluginPayloadAttachment (81 KB)
- Attachment: 190A9988-64BC-488B-9AA9-C82413F939D2.pluginPayloadAttachment (80 KB)
- T Taylor _ [REDACTED] ► 12/21/2024, 7:20 PM
And you fucking helped so many people who won't have to go through this ever again
- # ♥ Roy Orbison ♥ [REDACTED] ► 12/21/2024, 7:20 PM
Remember August?
- # ♥ Roy Orbison ♥ [REDACTED] ► 12/21/2024, 7:21 PM
Loved "And you fucking helped so many people who won't ha..."
- T Taylor _ [REDACTED] ► 12/21/2024, 7:21 PM
Never has a cancellation been reversed so fast
- T Taylor _ [REDACTED] ► 12/21/2024, 7:21 PM
You guys don't understand how rare this is
- T Taylor _ [REDACTED] ► 12/21/2024, 7:21 PM
To have proof and to take the perfect steps to bring that truth into the light
- # ?B? [REDACTED] ◀ 12/21/2024, 7:22 PM
Ash
- # ?B? [REDACTED] ◀ 12/21/2024, 7:22 PM
Like. My. God.
- # ?B? [REDACTED] ◀ 12/21/2024, 7:22 PM
I love you so much. I would not be ok through any of this if it weren't for you

T Taylor _ [REDACTED] ▶ 12/21/2024, 7:22 PM
Can you believe she just called

T Taylor _ [REDACTED] ▶ 12/21/2024, 7:22 PM
And was like

T Taylor _ [REDACTED] ▶ 12/21/2024, 7:23 PM
This pr chick wants to get info to blake

T Taylor _ [REDACTED] ▶ 12/21/2024, 7:23 PM
That means the world

?B? [REDACTED] ◀ 12/21/2024, 7:30 PM
It changed my life