Exhibit 271

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,
 	
    Plaintiff,
 	
v.
 	
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.
	Case No. 1:24-cv-10049-LJL

AMENDED EXPERT REPORT OF PROFESSOR ASHLEE HUMPHREYS

October 29, 2025

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I. QUALIFICATIONS

1.   I am a Professor of Integrated Marketing Communications at Medill School of

Journalism and Professor of Marketing at the Kellogg School of Management, Northwestern

University. I hold a Doctorate in Marketing from the Kellogg School of Management with a

concentration in Cultural Sociology and a Bachelor of Arts degree in Economics and Philosophy

from Northwestern University.

2.   I have been on the faculty at Northwestern University for 17 years, regularly teaching

classes on social media, consumer and marketing research, crisis communication, and reputation

repair. I instruct students on both the strategic and analytical tasks of Marketing, which include

assessing the impact of social media campaigns and strategically directing a portfolio of social

media tools to pursue managerial goals involving persuasion, advertising, market growth, and

branding. I have instructed over 2,000 students throughout my career, many of whom go on to

careers in marketing, including jobs in public relations at companies such as Edelman, Weber

Shandwick, and many others.

3.   I regularly produce published, peer-reviewed research about digital media, social media,

and marketing strategy. I am the author of *Social Media: Enduring Principles*, a review and

synthesis of the empirical social science research on social media. I also have conducted research

in online search and search engine optimization, including a project in which I use text analysis

to identify consumer goals that, when matched, can optimize advertising spending and increase

click-through rates. In this work, I have developed and refined the method of automated text

analysis, which I use to analyze textual data—a method I helped introduce to the study of

Marketing.

4.   My broader research focus concerns legitimacy and the role of institutions in markets.

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My dissertation research examined how markets are created through shifts in social structure using the case of casino gambling in America. This research ("Megamarketing: The Creation of Markets as a Social Process," *Journal of Marketing*, 2010) was selected as a lead article in the *Journal of Marketing*, the highest impact peer-reviewed journal in Marketing.[1]

5.   I serve in several high-level editorial positions in my field, including as a co-Editor of *Marketing Letters*, and as an Associate Editor at *Journal of Marketing*, *Journal of Consumer Research*, and the *Journal of Marketing Research* (ad hoc). These are some of the top journals in the field of Marketing.

6.   I have received several accolades for my research. I was a winner of the Sheth Foundation Award in 2025, given by the *Journal of Marketing* for long-term impact in Marketing, a runner up for the Sheth award in 2023, and a runner up for the Maynard Award for best paper in Marketing in 2010. I have also won the Sidney J. Levy award in 2010 for the contribution of my dissertation research to Consumer Culture Theory. In addition, I was selected as a Marketing Science Institute (MSI) Scholar in 2020, one of a select group of 35 Marketing Scholars who are counted "amongst the most prominent marketing scholars in the world," according to Barbara Kahn, MSI's Executive Director.[2]

7.   My full CV and list of matters in which I have testified are attached as Appendix A and Appendix B, respectively. I am being paid $900/hour for my work on this matter.[3] Neither my compensation nor that of my team is in any way dependent on the outcome of the case.

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[1]   Web of Science, https://www.scimagojr.com/journalrank.php?category=1406.
[2]   https://www.msi.org/articles/2020-msi-scholars-announced/.
[3]   I was assisted in the preparation of this report by a team of research assistants, whom I directed and supervised. Throughout my report, I use the word "I" to refer to work conducted by myself or work my team implemented under my direction and which I reviewed.

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II. ASSIGNMENT

8.　　I was engaged by counsel on behalf of Blake Lively to analyze the impact to Ms. Lively's

reputation, if any, from the retaliation campaign[4] that was orchestrated by the Defendants to

manipulate online discussion of Ms. Lively in August 2024. I have been asked to consider

activity that occurred across both social and other digital media, such as online news, in my

analysis. In addition, I have reviewed the Expert Report of Dr. Dina Mayzlin, who I understand

was retained by counsel for the plaintiff in this matter.[5]

9.　　I have also been asked (1) to calculate the number of impressions of the allegedly-

defamatory[6] statements ("At-Issue Statements") made about Ms. Lively by Mr. Baldoni's

attorney, Bryan Freedman ("Impressions Model"), (2) to analyze the reputational impact, if any,

of the At-Issue Statements by evaluating the public response to them ("Impact Assessment"), and

(3) to estimate the costs to repair Ms. Lively's reputation based on the impact of those

impressions ("Damages Model"). The At-Issue Statements were published in December 2024

and January 2025.

10.　　The analysis detailed in this report provides an estimate of the impressions of the At-

Issue Statements and their reputational impact in order to assess reputational harm. I have based

my analysis on the information provided to me by Counsel, my expertise in the fields of Social

Media, Consumer Research, and Marketing, and my independent research. I reserve the right to

supplement my analysis should additional information become available to me.

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[4]　Throughout this report, I use the phrase "retaliation campaign" to mean the allegedly coordinated PR and crisis campaign organized by Defendants against Ms. Lively. I base this portion of my analysis on the assumption that a retaliation campaign did occur. I understand that Dr. Dina Mayzlin, another expert retained by the Plaintiff in this matter, has found evidence that a retaliation online campaign against Ms. Lively occurred in August 2024.

[5]　Expert Report of Dina Mayzlin, October 17, 2025, ("Mayzlin Report").

[6]　Throughout this report, when I use the phrase "defamatory," I mean "allegedly-defamatory" and am basing my opinion on the assumption that these statements are defamatory.

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III. SUMMARY OF OPINIONS

11.   After reviewing the data provided in this case, performing independent research and

analysis, and based on my own professional background, prior research, education, and more

than a decade and a half of experience in the field of Marketing, I conclude the following with a

reasonable degree of certainty:

A. Ms. Lively's reputation was harmed by a retaliation campaign that occurred in August 2024.

    a. I understand that Dr. Mayzlin found that a retaliation campaign was initiated in early August 2024. This campaign introduced new negative associations and/or strengthened existing negative associations with Ms. Lively, constituting harm to her reputation and brand.

    b. Dr. Mayzlin found a notable increase in the frequency with which the terms "bully," "mean girl," and "tone deaf" appeared in posts about Ms. Lively as compared to the months before the campaign. Following the onset of the retaliation campaign, online and traditional media that associated Ms. Lively with these terms generated over 176 million impressions.

    c. This increase in negative associations with Ms. Lively is further evidenced by the rapid increase in negative sentiment in social media posts associated with Ms. Lively, the proliferation of negative tabloid articles about Ms. Lively, and an increase in consumer searches linking Ms. Lively to the associations introduced and/or amplified by the retaliation campaign.

    d. The negative associations that were introduced and/or strengthened during the campaign period persisted after Ms. Lively filed her initial Complaint. Online posts and comments repeated these negative associations following the filing of Ms. Lively's suit, including many from prominent and influential figures with large online followings.

    e. Ms. Lively is a well-known person whose person brand has meaning and value in the public sphere. Like all brands, the value of Ms. Lively's person brand is determined by the associations people hold with it. The introduction and widespread circulation of negative associations in August 2024 harmed Ms. Lively's reputation and her person brand. A diminished person brand results in fewer and/or less desirable professional opportunities for Ms. Lively because she may be perceived to be less effective as an endorser of products and services to a broad audience.

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f. I understand that Ms. Lively also suffered personal consequences, such as physical and emotional suffering in response to attacks on her character during and following the retaliation campaign.

B. The At-Issue Statements from late 2024 and early 2025 about Ms. Lively received more than 116 million impressions

a. The At-Issue Statements were circulated throughout the media system including major online news sites such as *The New York Times*, broadcast on major TV networks such as CNN and Fox, and appeared in posts on social media platforms such as TikTok, Instagram, YouTube, X, and Facebook.

b. My estimate of the number of impressions of the At-Issue Statements is based on a conservative calculation, which does not account for numerous places the statements appeared, such as Reddit posts, international online news articles, and alternative social media platforms.

C. The At-Issue Statements had an impact on Ms. Lively's reputation

a. The At-Issue Statements were made to an audience that was largely receptive to believing them.

    i. The retaliation campaign in August 2024 created a receptive audience for the At-Issue Statements by activating congruent, but distinct, negative associations toward Ms. Lively in the months that preceded the statements.

    ii. Consumers were more likely to be receptive to the defamatory statements due to Mr. Freedman's position as a prominent celebrity attorney who has been publicly endorsed by many of his high-profile clients. Indeed, Mr. Freedman was often presented as an informed and trusted source of information about Ms. Lively's allegations in social media posts, including by numerous online influencers. Mr. Freedman's connection to Mr. Baldoni and the other Defendants also increased receptivity to the At-Issue Statements, particularly given Mr. Baldoni's reputation for being an outspoken advocate for feminism and contemporary masculinity.

    iii. Consumer comments in social and digital media that contained the At-Issue Statements indicate that many consumers were receptive to the defamatory claims.

b. The At-Issue Statements harmed Ms. Lively's reputation by introducing new negative associations and/or strengthening existing negative associations with her in the public sphere.

    i. The defamatory claims were spread widely in traditional and online media, and many posts that reproduce the At-Issue Statements are accompanied by consumer comments that affirm and endorse the defamatory claims.

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    ii.   The defamatory claims came to represent a measurable share of online discussion about Ms. Lively, which was not the case prior to the publication of the statements. Following the publication of the At-Issue Statements, the seventh most used hashtag in posts mentioning Ms. Lively was #BlakeLivelyIsALiar. Additionally, the defamatory claims appeared in a notable amount of posts and comments on Reddit and X mentioning Ms. Lively and comments on Ms. Lively's Instagram posts.

    iii.   Negative associations such as the claim that Ms. Lively is a "liar" and that she made "false accusations" rose dramatically after the At-Issue statements, constituting a distinct set of reputation-damaging associations.

  c. Ms. Lively's reputation was harmed by the At-Issue Statements, which also damaged her person brand. As was the case with the retaliation campaign, the harm to Ms. Lively's person brand decreases the demand for her endorsement, makes her less marketable to a broad audience, and causes harm to her existing businesses. While I did calculate harm to her reputation and personal brand, I did not include direct harm to Ms. Lively's businesses in my damages calculation.

D. A reputational repair campaign to counteract the damage to Ms. Lively's reputation from the At-Issue Statements would cost between $14,625,160 and $24,375,267.

  a. A reputational repair campaign addresses the number and source of impressions of the defamatory publications, the impact of those impressions on the audience, and the costs of correcting those impressions targeted to that audience. Such a campaign would attempt to change attitudes by sharing new, positive corrective messages about Ms. Lively from audience-trusted sources based on the number of impressions from the defamatory statements.

  b. To change existing attitudes, corrective messages would need to be seen between three and five times, as indicated by peer-reviewed research on attitude change. Additionally, the corrective message would need to come from sources that the audience trusts, such as social media influencers.

  c. My assessment of damage is tied directly to the At-Issue Statements in this case and not others. While there are other negative associations about Ms. Lively within the public sphere, including those circulated by the Defendants and through the retaliation campaign, I do not account for those in my calculation of damages.

IV. BACKGROUND

A. Blake Lively

12.   Blake Lively is an actress and entrepreneur who first gained popularity in 2005 in her

breakout role in *The Sisterhood of the Traveling Pants*, a coming-of-age film based on the novel

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by the same name. Ms. Lively continued to gain popularity as a series regular on *Gossip Girl* (2007-2012), a drama from The CW depicting the lives of a group of teenagers from an elite New York City high school.[7] Ms. Lively has since starred in several films including *The Age of Adaline*, *Cafe Society*, *A Simple Favor*, and *Another Simple Favor*.[8]

13.   Ms. Lively has produced several films and started several business pursuits. Ms. Lively founded a line of non-alcoholic sparkling beverages called Betty Buzz in 2021 which sold over 2.5 million bottles in its first seven months.[9] She expanded her beverage offerings in 2023 with the launch of Betty Booze, a range of sparkling canned cocktails.[10] In 2024, she launched a beauty brand, Blake Brown Beauty, consisting of seven haircare products.[11] Ms. Lively is married to the actor Ryan Reynolds.[12]

B. Justin Baldoni, Wayfarer, et al.

14.   Justin Baldoni is an American actor, director, producer, and entrepreneur who first rose to prominence in 2014 for his role on The CW's *Jane the Virgin*, which ran for five seasons.[13] In 2019, Mr. Baldoni made his feature film directorial debut with *Five Feet Apart,* grossing over 90 million.[14] He is also the author of the book "Man Enough: Undefining My Masculinity," a personal account and exploration of masculinity.[15] He lives in ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮e ▮▮▮▮▮▮▮▮▮▮.[16]

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[7]   https://www.britannica.com/biography/Blake-Lively; https://www.imdb.com/name/nm0515116/bio/.
[8]   https://www.imdb.com/name/nm0515116/.
[9]   https://www.forbes.com/sites/jeffconway/2022/05/17/blake-lively-talks-betty-buzz-and-dominating-the-mixer-drink-industry/.
[10] https://thetab.com/2024/08/01/blake-lively-ryan-reynolds-side-hustles.
[11] https://thetab.com/2024/08/01/blake-lively-ryan-reynolds-side-hustles.
[12] https://www.architecturaldigest.com/story/inside-blake-lively-ryan-reynolds-real-estate-portfolio.
[13] https://www.imdb.com/name/nm1682573/bio/.
[14] https://www.boxofficemojo.com/release/rl3825501697/.
[15] https://manenough.com/.
[16] https://www.imdb.com/name/nm1682573/bio/; Deposition of Justin Baldoni, October 6, 2025, 19:10-12.

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15.   Mr. Baldoni is a co-founder of Wayfarer Studios, a production studio that advertises itself

as striving to "harness the power of storytelling to champion inspirational stories that act as true

agents for social change."[17] Among Wayfarer's notable projects are *The Garfield Movie*, *Clouds*,

and *It Ends With Us*.[18] Through Wayfarer, Mr. Baldoni has also expanded his book "Man

Enough" into an audio and visual podcast.[19]

C. Case Background

i. *It Ends With Us*

16.   "It Ends With Us" is a romance novel written by Colleen Hoover that was adapted into a

film. The story follows Lily Bloom, a Boston-based florist whose life changes when she meets

Ryle Kincaid, a neurosurgeon with an aversion to vulnerability.[20] The plot deals with themes of

domestic violence through Lily's upbringing with an abusive father and her relationship with

Ryle, focusing on Lily's ultimate efforts to break the cycle of violence.[21] The novel is Ms.

Hoover's most successful work, initially reaching the bestseller list following its 2016 release

and reappearing years later during the COVID-19 pandemic as it caught traction on TikTok.[22]

17.   The film adaptation of the novel, which stars Ms. Lively (Lily Bloom) and Mr. Baldoni

(Ryle Kincaid), grossed over $350 million worldwide, making it the most successful romantic

drama since 2018's *A Star is Born*.[23] Mr. Baldoni directed the film, with production credits going

to, among others, Ms. Lively, Steve Sarowitz, and Jamey Heath.[24]

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[17]   https://www.wayfarerstudios.com/.
[18]   https://www.wayfarerstudios.com/#projects.
[19]   https://www.wayfarerstudios.com/#projects.
[20]   https://www.colleenhoover.com/products/it-ends-with-us.
[21]   https://www.hollywoodreporter.com/movies/movie-news/it-ends-with-us-biggest-box-office-since-star-is-born-1235996877/; https://www.colleenhoover.com/products/it-ends-with-us.
[22]   https://www.nytimes.com/2024/08/11/business/media/it-ends-with-us-box-office.html.
[23]   https://www.hollywoodreporter.com/movies/movie-news/it-ends-with-us-biggest-box-office-since-star-is-born-1235996877/; https://www.boxofficemojo.com/title/tt10655524/.
[24]   https://www.rottentomatoes.com/m/it_ends_with_us/cast-and-crew.

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ii. Defendants' retaliation campaign targeting Ms. Lively

18.   I understand that Mr. Baldoni hired Melissa Nathan, a crisis PR specialist in reputation management and personal branding, and her company The Agency Group PR LLC ("TAG") on July 31, 2024.[25] I also understand that in the weeks surrounding the release of the film there was an increase in online discourse related to Ms. Lively, Mr. Baldoni's relationship to Ms. Lively, and the cast more generally.[26]

19.   The Second Amended Complaint describes communications between Mr. Baldoni and TAG, which include plans to allegedly turn public opinion against Ms. Lively through, among other methods, inauthentic online commentary that advances narratives in a manner designed to appear to come from organic (or non-manipulated) sources.[27] Per the Second Amended Complaint, TAG allegedly assured Mr. Baldoni that Ms. Lively would be "destroy[ed]" and "buried" through their "social manipulation" plan.[28]

iii. The filing of the present lawsuit

20.   On December 20, 2024, Ms. Lively filed her initial Complaint.[29] On December 21, 2024, *The New York Times* published an article with the headline "'We Can Bury Anyone': Inside a Hollywood Smear Machine," after which Ms. Lively, Mr. Baldoni, and the various disputes between them became a common topic of discussion in the media and online.[30]

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[25]   Second Amended Complaint, ¶ 29.
[26]   See, for example, https://www.salon.com/2024/08/09/it-ends-with-us-controversy/.
[27]   Second Amended Complaint, ¶ 30.
[28]   Second Amended Complaint, ¶ 36.
[29]   Second Amended Complaint, ¶ 294.
[30]   https://www.nytimes.com/2024/12/21/business/media/blake-lively-justin-baldoni-it-ends-with-us.html; See also: https://x.com/mega2e/status/1870493578864349566, https://www.newyorker.com/culture/critics-notebook/blake-lively-justin-baldoni-and-the-collapse-of-the-hollywood-metoo-era, https://open.spotify.com/episode/1zICBvgHB2mAYltkCQ2lBP.

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iv.   **Bryan Freedman**

21.   Bryan Freedman is Mr. Baldoni's attorney and a founder of the law firm Liner Freedman

Taitelman + Cooley LLP.[31] Mr. Freedman has represented some of the biggest names in

entertainment including, among others, Julia Roberts, Quentin Tarantino, and the Michael

Jackson Estate, as well as Megyn Kelly and Perez Hilton.[32]

V. ACADEMIC BACKGROUND ON REPUTATIONS AND REPUTATIONAL HARM

A. Reputation and reputational damage

22.   Reputation is fundamentally a social concept; one's reputation is determined by the social

esteem held among a bounded group of people, up to and including the public sphere at large.[33]

A reputation has value in the sense that it gives someone social standing and respect in society.

Scholars on the subject have conceptualized reputation as a type of property—something that has

economic value—and as dignity—something that has moral value.[34] Reputation is determined in

the sphere of generalized public opinion, which encompasses individual beliefs but is more than

the sum of them, a "generalized perception."[35] What a person thinks their friends, family,

coworkers, and other members of their community think is an important determinant of that

individual's beliefs, particularly if one does not initially have strong opinions about an issue or

person. A reputation can shift over time based on the beliefs of a subset of society.

23.   Over time, as people take cues from those around them who believe differently, public

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31   https://lftcllp.com/lawyers/bryan-j-freedman/.
32   https://lftcllp.com/lawyers/bryan-j-freedman/.
33   Weber, Max (1922/1978), *Economy and Society: An Outline of Interpretive Sociology*, Vol. 2: University of California press.
34   Ardia, David S. (2010) "Reputation in a Networked World: Revisiting the Social Foundations of Defamation Law," *Harvard Civil Rights-Civil Liberties Law Review*, 45(2), 261-328, p. 261.
35   Weber, Max (1922/1978), *Economy and Society: An Outline of Interpretive Sociology*, Vol. 2: University of California press; Sharman, Jason C. (2007) "Rationalist and constructivist perspectives on reputation." *Political Studies* 55, no. 1: 20-37.

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opinion and generalized associations can shift.[36] If someone is receptive to a claim—if it is

congruent with their other beliefs and/or if the claim comes from a source they trust—they may

only need to be exposed to it once to believe that claim.[37] If they are less receptive to the claim,

exposure and repetition, again from a trusted source, can eventually change attitudes.[38] An

individual's receptivity to a claim is based on the way people process new information, form

beliefs, and integrate beliefs with prior knowledge.[39]

B. Person brands and brand value

24.   When people are well-known in the public sphere, their reputation is tied to their value as

a person brand. Human, or person, brands are "well-known persona[e] who [are] the subject of

marketing communications efforts," and have been shown to enhance consumers' feelings of

autonomy and relatedness to the brand and others.[40] Starting from attachment theory, scholars

have researched the ways in which consumers and audiences form attachments to people—who

themselves become brands—through exposure in a media system.[41] Person brands are both

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[36]   Dewenter, Ralf, Melissa Linder, and Tobias Thomas (2019), "Can Media Drive the Electorate? The Impact of Media Coverage on Voting Intentions," *European Journal of Political Economy*, 58, 245-61; Huang, J., et al. (2021). "Large-scale quantitative evidence of media impact on public opinion toward China," *Humanities and Social Sciences Communications,* 8(1): 1-8.

[37]   Heider, Fritz (1946), "Attitudes and Cognitive Organization," *The Journal of Psychology*, 21 (1), 107-12, Hummon, Norman P and Patrick Doreian (2003), "Some Dynamics of Social Balance Processes: Bringing Heider Back into Balance Theory," *Social networks*, 25 (1), 17-49.

[38]   Cialdini, Robert B (1987), *Influence : The Psychology of Persuasion*, Vol. 3: A. Michel Port Harcourt, Chapter 3; Sterrett, David, Dan Malato, Jennifer Benz, Liz Kantor, Trevor Tompson, Tom Rosenstiel, Jeff Sonderman, and Kevin Loker (2019), "Who Shared It?: Deciding What News to Trust on Social Media," *Digital Journalism*, 7 (6), 783-801.

[39]   Ajzen, I. (1985). From intentions to actions: A theory of planned behavior. In J. Kuhl & J. Beckmann (Eds.), Action control: From cognition to behavior. Berlin, Heidelber, New York: Springer-Verlag. (pp. 11–39); Heider, Fritz (1958). The psychology of interpersonal relations. John Wiley & Sons Inc.; Cacioppo, John T and Richard E Petty (1980), "Persuasiveness of Communications Is Affected by Exposure Frequency and Message Quality: A Theoretical and Empirical Analysis of Persisting Attitude Change," *Current issues and research in advertising*, 3 (1), 97-122.

[40]   Thomson, M. (2006). "Human Brands: Investigating Antecedents to Consumers' Strong Attachments to Celebrities." *Journal of Marketing*, 70(3), 104–119, p. 104.

[41]   Dyer (1979) Heavenly Bodies: Film Stars and Society; Thomson, M. (2006). "Human Brands: Investigating Antecedents to Consumers' Strong Attachments to Celebrities." *Journal of Marketing*, 70(3), 104–119; Parmentier, Marie-Agnès, Eileen Fischer, and A Rebecca Reuber (2013), "Positioning Person Brands in Established Organizational Fields," Journal of the Academy of Marketing Science, 41 (3), 373-87; Fournier,

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biographical people and brands—constellations of meaning—and these two elements form

interdependences as the actions of biographical people can affect their brand value.[42]

25.   Brand value can be represented as the aggregate of associations with a brand.[43] If those

associations change, brand value can be diminished. Person brands derive their brand value from

these associations, as they develop and shape cultural, social, and symbolic capital.[44] Cultural

capital can be embodied in tastes and values, objectified in ownership of material objects, and

institutionalized in the form of credentials and awards.[45] Person brands have cultural capital to

the extent that they have embodied tastes that help them guide organizational decisions such as

hiring, product design, and strategic positioning that is culturally resonant. For example, when a

person brand joins a top fashion house, they may refresh its identity and direct its aesthetics in

line with their vision.[46] Social capital is both the quantity and quality of social connections, both

weak and strong ties, that serve as a resource for the person brand.[47]

26.   Person brands also possess symbolic capital—"accumulated prestige, celebrity, [and]

S., & Eckhardt, G. M. (2019). "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619.

[42]   Fournier, S., & Eckhardt, G. M. (2019). "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619.

[43]   Keller, K.L. (1993) "Conceptualizing, Measuring, and Managing Customer-Based Brand Equity." *Journal of Marketing*, 57:1, 1-22.

[44]   Brooks, Gillian, Jenna Drenten, and Mikolaj Jan Piskorski (2021). "Influencer Celebrification: How Social Media Influencers Acquire Celebrity Capital," *Journal of Advertising*, 50 (5), 528-47; Parmentier, Marie-Agnès, Eileen Fischer, and A Rebecca Reuber (2013). "Positioning Person Brands in Established Organizational Fields," *Journal of the Academy of Marketing Science*, 41 (3), 373-87; Parmentier, Marie-Agnès and Eileen Fischer (2021), "Working It: Managing Professional Brands in Prestigious Posts," *Journal of Marketing*, 85 (2), 110-28; Parmentier, Marie-Agnès, and Eileen Fischer (2012), "How athletes build their brands," *International Journal of Sport Management and Marketing*, 11(1-2), 106-24; Fournier, S., & Eckhardt, G. M. (2019). "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619.

[45]   Bourdieu, P., Richardson, J. (1986) "The Forms of Capital." *A Handbook of Theory and Research for the Sociology of Education*, Westport, CT: Greenwood, pp. 241-58, p. 242.

[46]   Parmentier, Marie-Agnès and Eileen Fischer (2021), "Working It: Managing Professional Brands in Prestigious Posts," *Journal of Marketing*, 85 (2), 110-28.

[47]   Brooks, Gillian, Jenna Drenten, and Mikolaj Jan Piskorski (2021), "Influencer Celebrification: How Social Media Influencers Acquire Celebrity Capital," *Journal of Advertising*, 50 (5), 528-47.

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consecration of honour"[48]—which arises when their economic, social, or cultural capital is widely recognized as legitimate and respected.[49] In essence, symbolic capital reflects the value that others assign to their status, authority, or achievements within a given field and is closely tied to reputation.[50] Precisely because person brands are both *people* and *brands*, their social, cultural and symbolic capital are intertwined as they are viewed externally by the public. They are simultaneously holders of social connections (social capital), embodied tastes (cultural capital) *and* holders of honor and prestige when these forms of capital are judged collectively (symbolic capital).

> i. **Reputation is harmed when negative associations are connected to a person's reputation**

27.   Person brands can become devalued following unpredictable or unforeseen events that introduce or strengthen negative associations in the public sphere.[51] Fournier and Eckhardt, for example, find that mortality, hubris, unpredictability, and social embeddedness underlie the value of person brands and have the potential to build or diminish brand value. As Fournier and Eckhardt say, "the meaning and daily manifestations of person-brands are inherently socially embedded in a web of relationships that the person-brand cannot control, escape, or ignore."[52] That is, if an unpredictable event occurs or a claim is made about the person, it affects their

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[48]   Bourdieu, P. (1993) *The Field of Cultural Production: Essays on Art and Literature*. Columbia University Press, New York, p.7.

[49]   Üstüner, Tuba and Craig J. Thompson (2012) "How Marketplace Performances Produce Interdependent Status Games and Contested Forms of Symbolic Capital." *Journal of Consumer Research*, 38, (5), 796 - 814; Bourdieu, P., & Wacquant, L. (1992). *An Invitation of Reflexive Sociology*. Chicago: University of Chicago; Bourdieu, P., & Wacquant, L. (2013). "Symbolic capital and social classes." *Journal of Classical Sociology*, 13(2), 292-302.

[50]   Bourdieu, P., & Wacquant, L. (1992). *An Invitation of Reflexive Sociology*. Chicago: University of Chicago; Bourdieu, P., & Wacquant, L. (2013). "Symbolic capital and social classes." *Journal of Classical Sociology*, 13(2), 292-302.

[51]   Dyer (1979) *Heavenly Bodies: Film Stars and Society*; Gamson (1994) *Claims to Fame: Celebrity in Contemporary America*.

[52]   Fournier, S., & Eckhardt, G. M. (2019) "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619, p. 611.

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brand due to their embeddedness within a social system.[53] The damage to a person brand can be

severe and lasting, and this damage can persist, *even when* they are not at fault.[54] It can persist

even when their primary fans or followers do not believe the claims[55] and *even after* being

corrected.[56] Loss of value for a person brand, particularly a person brand that has a general

popular following, can be harmed even if only a subset of the public believes the negative

claims.[57] Person brands have social and cultural capital.[58] This capital can become harmed,

thereby affecting their overall brand value to a popular audience.

ii.   Negative, sensational, and/or false information have strong cognitive effects

28.   Understanding the negative impact of false information on reputation also requires

understanding how humans process and retain information. Information that is negative,

sensational, and/or false spreads further and faster than information that is ordinary or positive.[59]

Research shows that not only does negative and sensational information travel farther and faster,

but it is also "stickier" and more likely to be remembered.[60]

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[53]   Fournier, S., & Eckhardt, G. M. (2019) "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619.

[54]   David, John (2016), *How to Protect (or Destroy) Your Reputation Online: The Essential Guide to Avoid Digital Damage, Lock Down Your Brand, and Defend Your Business*: Red Wheel/Weiser.

[55]   Luedicke, Marius K, Craig J Thompson, and Markus Giesler (2010), "Consumer Identity Work as Moral Protagonism: How Myth and Ideology Animate a Brand-Mediated Moral Conflict," *Journal of consumer research*, 36 (6), 1016-32.

[56]   Thorson, Emily. "Belief echoes: The persistent effects of corrected misinformation." *Political Communication* 33, no. 3 (2016): 460-480.

[57]   Centola, Damon Joshua Becker, Devon Brackbill, and Andrea Baronchelli (2018). "Experimental evidence for tipping points in social convention." *Science*, 360(6393), 1116-1119; Moscovici, Serge, Bernard Personnaz (1980). "Studies in social influence: V. Minority influence and conversion behavior in a perceptual task." *Journal of Experimental Social Psychology*, 16(3), 270-282.

[58]   Brooks, Gillian, Jenna Drenten, and Mikolaj Jan Piskorski (2021), "Influencer Celebrification: How Social Media Influencers Acquire Celebrity Capital," *Journal of Advertising*, 50 (5), 528-47, Parmentier, Marie-Agnès, Eileen Fischer, and A Rebecca Reuber (2013), "Positioning Person Brands in Established Organizational Fields," *Journal of the Academy of Marketing Science*, 41 (3), 373-87.

[59]   Taylor, S.E., (1991), "Asymmetrical Effects of Positive and Negative Events: The Mobilization-Minimization Hypothesis," *Psychological Bulletin*, 110(1): 67-85; Skurnik, I., (2005), "Special Session Summary Rumors, Refutations, and Conflicts of Interest: Problems in Dealing With Unreliable Information," *Association for Consumer Research*, pg. 274-276.

[60]   Taylor, S.E., (1991), "Asymmetrical Effects of Positive and Negative Events: The Mobilization-Minimization Hypothesis," *Psychological Bulletin*, 110(1): 67-85; Vosoughi, S., Roy, D., and Aral, S., (2018), "The spread

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29.   Gossip and rumors are often driven by highly sensational and negative information. Rumor or gossip emerges when a topic is perceived as both relatively important (i.e. involves a prominent person or persons), but also ambiguous.[61] People gossip to make sense of this ambiguity, and social gossip often involves ambiguity around appropriate social roles and social boundaries.[62] Gossip is one key way that people share reputational information[63] and has been shown to be a form of indirect aggression.[64] Research shows that people are most likely to gossip about celebrities, negative information, and moral topics.[65] Perceived transgressions of social boundaries such as gender roles receive particularly harsh penalties in terms of reputational evaluation and gossip.[66] For example, when women violate stereotypical expectations of warmth or agency, these violations become noteworthy to observers and a topic of reputational evaluation.[67]

30.   In the contemporary information environment, gossip often occurs online. The rapid dissemination of ideas is driven by the target, valance, and content of the information.

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of true and false news online," *Science*, 359: 1146-1151, pg. 1147-1148; Skurnik, I., (2005), "Special Session Summary Rumors, Refutations, and Conflicts of Interest: Problems in Dealing With Unreliable Information," *Association for Consumer Research*, pg. 274-276.

[61]   Allport, G. W., & Postman, L. (1946). "An analysis of rumor." *Public opinion quarterly*, *10*(4), 501-517.

[62]   Beersma, Bianca; Van Kleef, Gerben A (2012) "Why People Gossip: An Empirical Analysis of Social Motives, Antecedents, and Consequences", *Journal of Applied Social Psychology*, 2012, Vol.42(11), p. 2640-2670.

[63]   Feinberg, M., Willer, R., Stellar, J., Keltner, D. (2012) "The Virtues of Gossip: Reputational Information Sharing as Prosocial Behavior." *Journal of Personality and Social Psychology*, Vol. 102(5): 1015-30.

[64]   Emile Jeuken, Bianca Beersma, Femke S. ten Velden, and Maria T. M. Dijkstra, (2015), "Aggression as Motive for Gossip During Conflict: The Role of Power, Social Value Orientatio, and Counterpart's Behavior," Negotiation and Conflict Management Research 8(3). 137-152.

[65]   Lee J, Kralik JD, Kwon J, Jeong J (2022) "How 'who someone is' and 'what they did' influences gossiping about them." *PLOS ONE* 17(7): e0269812.

[66]   Rudman, L. A., & Glick, P. (2002). "Prescriptive gender stereotypes and backlash toward agentic women." Journal of Social Issues, 57(4), 743–762.; Eagly, A. H., & Karau, S. J. (2002). "Role congruity theory of prejudice toward female leaders." Psychological Review, 109(3), 573–598.; Brescoll, V. L. (2011). "Who takes the floor and why: Gender, power, and volubility in organizations." Administrative Science Quarterly, 56(4), 622–641.; Brescoll, V. L., & Uhlmann, E. L. (2008). "Can an angry woman get ahead? Status conferral, gender, and expression of emotion in the workplace." Psychological Science, 19(3), 268–275.; Kennedy, J. A., McDonnell, M.-H., & Stephens, N. (2016). "Does gender raise the ethical bar? Exploring the punishment of ethical violations at work." Working paper on SSRN.

[67]   Ibid.

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Information that spreads online, where sensational news is more likely to "go viral," receives

increased dissemination and attention due to its novelty.[68] Information, gossip, and rumors that

spread online benefit from the lack of traditional geographic boundaries, allowing for user

engagement such as commenting and sharing, which further disseminates the information to

other users.[69]

31.   Repeated exposure to information also increases the likelihood it is remembered and

believed due to the *illusory truth effect*, a well-established psychological principle whereby

repeated information is more likely to feel familiar, and thus more likely to be believed.[70] The

illusory truth effect has been shown to apply even when the information is highly implausible or

known to be false.[71] Information encountered online is more likely to be trusted when it comes

from individuals perceived as credible or familiar, such as celebrities, influencers, or people

within one's personal network.[72] When someone is familiar, their statements are more likely to

be accepted at face value, even without independent verification.[73] This trust can transfer to the

information they share, leading others to believe and repeat it simply because of who said it,

rather than what was said. In the case of online information, these effects may be magnified

when a trusted celebrity or influencer's message is then shared or repeated by people within

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[68]   Vosoughi, S., Roy, D., and Aral, S. (2018). "The spread of true and false news online." *Science*, 359: 1146-1151, pg. 1147-1148.

[69]   Buchanan, T. & Benson, V. (2019). "Spreading Disinformation on Facebook: Do Trust in Message Source, Risk Propensity, or Personality Affect the Organic Reach of 'Fake News'?," *Social Media and Society*, 1-9.

[70]   Udry, White, & Barber (2022). "The effects of repetition spacing on the illusory truth effect." *Cognition*, 225(1):105157.

[71]   Hassan, A., & Barber, S. J. (2021). "The effects of repetition frequency on the illusory truth effect." *Cognitive Research: Principles and Implications*, 6: 1-12; Lacassagne, D., Béna, J., & Corneille, O. (2022). "Is Earth a perfect square? Repetition increases the perceived truth of highly implausible statements." *Cognition*, 223: 105052; Fazio, L. K., Brashier, N. M., Payne, B. K., & Marsh, E. J. (2015). "Knowledge does not protect against illusory truth," *Journal of Experimental Psychology: General,* 144: 993-1002.

[72]   Turcotte, Jason, Chance York, Jacob Irving, Rosanne Scholl, & Raymond Pingree (2015). "News Recommendations from Social Media Opinion Leaders." *Journal of Computer-Mediated Communication*, 20(5), 520–535.

[73]   Metzger, Miriam J., Andrew J. Flanagin, & Ryan B. Medders (2010). "Social and Heuristic Approaches to Credibility Evaluation Online." *Journal of Communication*, 60(3), 413–439.

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one's social network.[74]

iii.   Negative associations can cause both immediate and long-lasting harm when they remain available in the public sphere

32.   Understanding the modern media ecosystem requires understanding how social media platforms filter and display content, how digital platforms – web, video, and social media – disseminate information, and how information is related to retained online, remaining in the public sphere in perpetuity.

33.   The public sphere is the arena of social connection and information sharing where public opinion is shaped.[75] A century ago, the public sphere may have been the public square or the local newspaper and celebrity coverage may have been centered in tabloid press.[76] In today's world, the public sphere is constituted by a complex media system of both online and offline media.[77] Information in the public sphere persists over time and can be a reservoir of meanings and connections that endure into the future, shaping public opinion.[78]

34.   When a prominent person or media entity makes a statement, it enters the public sphere via the media system, a network of platforms and people that circulate information.[79] Once a

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[74]   Metzger, Miriam J., Andrew J. Flanagin, & Ryan B. Medders (2010). "Social and Heuristic Approaches to Credibility Evaluation Online." *Journal of Communication*, 60(3), 413–439.

[75]   https://opentextbc.ca/mediastudies101/chapter/habermas-public-sphere/.

[76]   McCombs, Maxwell E., and Donald L. Shaw (1972). "The Agenda-Setting Function of Mass Media." *Public Opinion Quarterly* 36:2, 176–187; Bumsoo Kim, Han Lin, Yonghwan Kim, (2024). "Interplay of agenda setters in the digital age: The associative issue network between news organizations and political YouTube channels." *Computers in Human Behavior*, Volume 155; McCombs, Maxwell E., and Donald L. Shaw (1993). "The evolution of agenda-setting research: Twenty-five years in the marketplace of ideas." *Journal of communication* 43:2, 58-67.

[77]   Baym, N. K., & Boyd, D. (2012). "Socially Mediated Publicness: An Introduction." *Journal of Broadcasting & Electronic Media, 56*(3), 320–329; Boyd, D. (2010). "Social network sites as networked publics: Affordances, dynamics, and implications." In *Networked Self: Identity, Community, and Culture on Social Network Sites* (pp. 47-66). Routledge.

[78]   Baym, N. K. (2015). *Personal connections in the digital age.* John Wiley & Sons.

[79]   Chadwick, A. (2017) *The Hybrid Media System: Politics and Power*: Oxford University Press; Curran, J., Shanto I., Lund, A.B., and Salovaara-Moring, I. (2009) "Media System, Public Knowledge and Democracy: A Comparative Study," *European Journal of Communication* 24(1): 5-26; Gans, H.J. (2004) *Deciding What's News: A Study of CBS Evening News, NBC Nightly News, Newsweek, and Time*: Northwestern University

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claim is made by a prominent person or organization, it is circulated in a media system. Unlike earlier eras where information may fade and be forgotten, information now lives on in the archive that is the internet, and the information is often consistently available in the online information network through search and sharing.[80]

35.   As illustrated in Figure 1, the media system includes both traditional and social media, coverage by major print, tabloid, and broadcast news outlets; podcasts and radio; social media posts on TikTok, X, and other platforms; and, in some instances, re-coverage of the claims themselves in traditional journalism or social media,[81] to say nothing of word-of-mouth conversation and other informal channels such as rumor or gossip.[82] There is a feedback loop between the traditional media outlets and social media, leading to the increased spread of ideas.[83] Social media accounts for an increasingly large share of consumers' media consumption.[84]

Press.

[80]   Langlois, G., & Slane, A. (2017) "Economies of reputation: the case of revenge porn", *Communication and Critical/Cultural Studies*, 14(2): 120–138.

[81]   Pfeffer, Jürgen, Thomas Zorbach, and Kathleen M Carley (2014), "Understanding Online Firestorms: Negative Word-of-Mouth Dynamics in Social Media Networks," *Journal of Marketing Communications*, 20:1-2, 117-28; Tuchman, Gaye (1978), *Making News: A Study in the Construction of Reality*, New York: Free Press; Curran, J., Shanto I., Lund, A.B. and Salovaara-Moring, I. (2009) "Media System, Public Knowledge and Democracy: A Comparative Study," *European Journal of Communication*, 24(1): 5-26; Messner, Marcus and Marcia Watson Distaso (2008), "The Source Cycle: How Traditional Media and Weblogs Use Each Other as Sources," *Journalism Studies*, 9 (3), 447-63.

[82]   Rosnow, R.L. and Fine, G.A. (1976) *Rumor and Gossip: The Social Psychology of Hearsay*: Elsevier.

[83]   Pfeffer, J., Zorbach, T., and Carley, K.M. (2014). "Understanding Online Firestorms: Negative Word-of-Mouth Dynamics in Social Media Networks," Journal of Marketing Communications, 20 (1-2): 117-28.

[84]   See, for example, https://www.oberlo.com/statistics/how-much-time-is-spent-with-different-forms-of-media; https://www.statista.com/topics/1536/media-use/; and https://www.emarketer.com/content/digital-media-makes-up-nearly-two-thirds-of-consumers-total-time-spent-with-media.

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Figure 1. The Media System
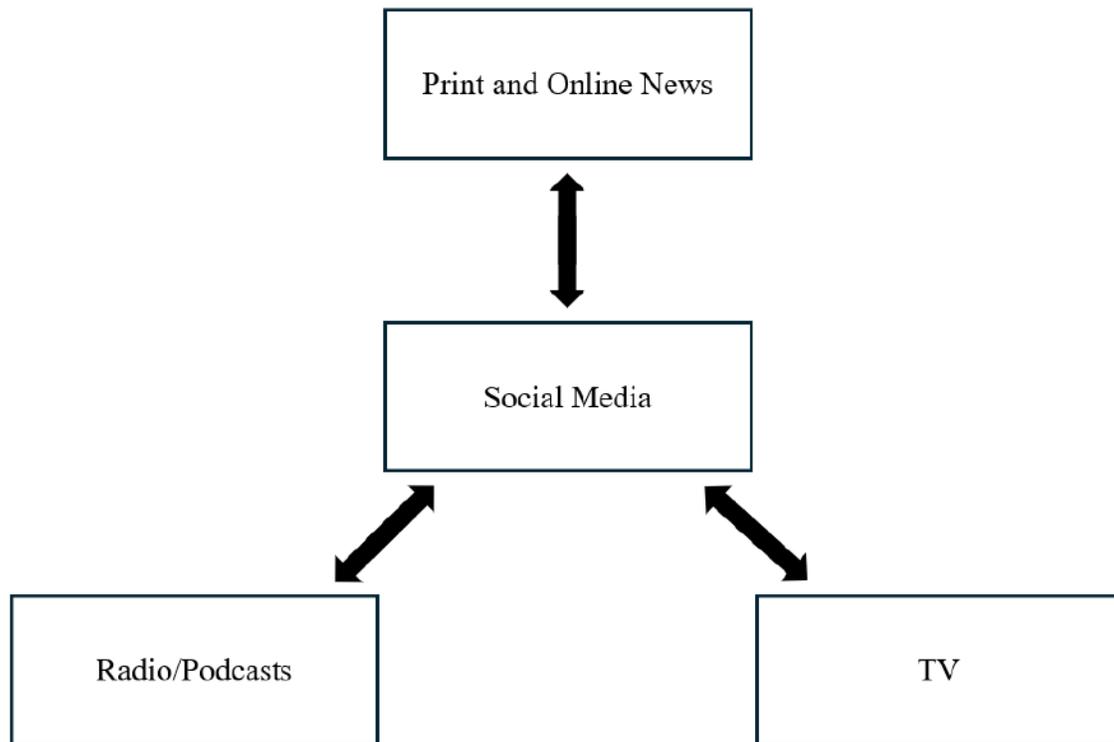
36.   In the age of digital connectivity, a person's reputation exists in the public sphere that exists online as information circulates, but also in the information that is stored in archives, social media posts, online news stories, and videos. Online information, in many if not most cases, remains accessible for a long period of time to anyone with internet access.[85] Even if information is proven to be false, it may persist on websites, social media posts, and even in the underlying data of LLMs like ChatGPT, such that the general public could continue to be exposed to, and believe, false information.

    iv.   **Strategic communications**

37.   The strategic actions of firms and individuals shape information available and accessible

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[85]   Baym, Nancy K. (2015) *Personal connections in the digital age*. John Wiley & Sons.

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in the public sphere, thereby shaping public opinion.[86] Strategic communication is defined as

"the purposeful use of communication by an organization to fulfill its mission."[87] Hallahan et al.

(2007) explain, that strategic communication "implies that people will be engaged in deliberate

communication practice on behalf of organizations, causes, and social movements."[88] A number

of fields are involved in studying aspects of strategic communication: marketing, advertising,

public relations, and management.

38.   Through strategic communication, individuals and organizations affect shared beliefs of

the public.[89] The media plays an important role in the strategic communication process by

conveying messages put forward by individuals and organizations. In addition to issuing

statements directly to the public, strategic communications works through intermediaries of the

media and other conduits that relay the message to the public. Strategic attempts change attitudes

occur through a process called two-step flow[90] whereby the individual or organization

communicates the message to intermediaries through press conferences, press releases, and

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[86]   McCombs, Maxwell E., and Donald L. Shaw (1972). "The agenda-setting function of mass media." *Public Opinion Quarterly,* 36(2), 176-187; McCombs, Maxwell E., and Donald L. Shaw (1993). "The evolution of agenda-setting research: Twenty-five years in the marketplace of ideas." *Journal of communication* 43:2, 58-67; Gamson, William A., and Andre Modigliani (1989). "Media discourse and public opinion on nuclear power: A constructionist approach." *American journal of sociology* 95, no. 1: 1-37; Benford, Robert D., and David A. Snow (2000). "Framing processes and social movements: An overview and assessment." *Annual review of sociology* 26, no. 2000: 611-639. Huang, J., Cook, G. G., & Xie, Y. (2021). Large-scale quantitative evidence of media impact on public opinion toward China. *Humanities and Social Sciences Communications, 8*(1), 1-8.

[87]   Hallahan, Kirk & Holtzhausen, Derina & Ruler, Betteke & Verčič, Dejan & Sriramesh, Krishnamurthy. (2007). "Defining Strategic Communication." *International Journal of Strategic Communication*, 1, 3-35, p.3.

[88]   Hallahan, Kirk & Holtzhausen, Derina & Ruler, Betteke & Verčič, Dejan & Sriramesh, Krishnamurthy. (2007). "Defining Strategic Communication." *International Journal of Strategic Communication*, 1, 3-35, p.4.

[89]   Humphreys, Ashlee (2010), "Megamarketing: The Creation of Markets as a Social Process," *Journal of Marketing, 74* (2), 1-19 (lead article); Kotler, P. (1986), "Global standardization—courting danger," *Journal of Consumer Marketing, 3*(2), 13-15; Maciel, A. F., & Fischer, E. (2020), "Collaborative market driving: How peer firms can develop markets through collective action," *Journal of Marketing, 84*(5), 41-59. Huang, J., Cook, G. G., & Xie, Y. (2021). Large-scale quantitative evidence of media impact on public opinion toward China. *Humanities and Social Sciences Communications, 8*(1), 1-8. Elsbach, K. D. (1994). Managing organizational legitimacy in the California cattle industry: The construction and effectiveness of verbal accounts. *Administrative science quarterly*, 57-88.

[90]   Katz & Lazarsfeld (1955), *Personal Influence*, New York: Free Press.

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making other public statements in public meetings and hearings. Those messages are picked up

by intermediaries—who may include experts, influential speakers and other sources—and can

ultimately shape public opinion.[91] Experts and influential speakers are those who have gained the

trust of some percent of the public.[92] Modern strategic communication utilizes not only

mainstream media like online news, print, or television but also a wide range of intermediaries

such as social media influencers, blogs, podcasts, and online communities.[93]

39.   Prior research has found that framing—how an individual, company, or policy is

conveyed—affects public perceptions by aligning a target individual or policy with a set of

stigmatized concepts or categories.[94] For example, referring to someone as an "illegal

immigrant" vs. an "undocumented worker" highlights their status as a criminal rather than a

member of an economy. In this way, framing has systematic and measurable effects on public

opinion. Examples include reporting on "gambling" versus "gaming," "fracking" versus

"hydraulic fracturing," or reporting a proposed policy change as the "death tax" vs. an "estate

tax." Often these frames work by activating deeply held human cognitive associations such

stereotypes based on gender or race and cultural binaries (e.g., "good" vs. "bad").[95] For example,

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[91]   Gamson, W. A., & Modigliani, A. (1989), "Media discourse and public opinion on nuclear power: A constructionist approach," *American journal of sociology*, 95(1), 1-37.

[92]   Traberg, Cecilie Steenbuch & Sander van der Linden (2022), "Birds of a feather are persuaded together: Perceived source credibility mediates the effect of political bias on misinformation susceptibility," *Personality and Individual Differences*, 185: 111269; Whitehead Jr, J. L. (1968). "Factors of source credibility," *Quarterly Journal of Speech*, 54(1), 59-63; Pornpitakpan, C. (2004), "The persuasiveness of source credibility: A critical review of five decades' evidence," *Journal of applied social psychology*, 34(2), 243-281.

[93]   Borchers, N. S. (2019). "Social media influencers in strategic communication," *International Journal of Strategic Communication*, 13(4), 255-260.

[94]   Bitektine, A. (2011), "Toward a theory of social judgments of organizations: The case of legitimacy, reputation, and status," *Academy of management review*, 36(1), 151-179; Huff, A. D., Humphreys, A. & Wilner, S. J. (2021), "The politicization of objects: Meaning and materiality in the U.S. cannabis market," *Journal of Consumer Research*, 48(1), 22-50; Humphreys, A. & Latour, K. A. (2013), "Framing the game: Assessing the impact of cultural representations on consumer perceptions of legitimacy," *Journal of Consumer Research*, 40(4), 773-795.

[95]   Benford, R. D. & Snow, D. A. (2000), "Framing processes and social movements: An overview and assessment," *Annual review of sociology*, 26(1), 611-639; Ferree, M. M., & Merrill, D. A. (2000), "Hot

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information that is framed as violating a gender norm has greater impact on attitudes.[96]

40.   Strategic communications can also be leveraged to change attitudes from positive to negative, often by providing new, negative associations or strengthening existing negative associations. For example, Bill Ackman, a hedge fund manager, admitted to spending some $50 million to wage a campaign against Herbalife, a multi-level supplements seller.[97] This campaign involved calling the company "a pyramid scheme" and speaking against the company in social media posts and press interviews, as well as "detailed and lengthy public letters."[98] Herbalife ended up paying $200 million in an Federal Trade Commission (FTC) settlement a year later, which involved the FTC investigating Mr. Ackman's statements about the company.[99]

41.   Other intermediaries in the social system also play a role in strategic communication and carrying frames to the public. Experts and influencers have power in their ability to share some information (and not other information), persuade the public through trust in their expertise, and guide public attention to some aspects of products and services over other aspects.[100] Further,

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movements, cold cognition: Thinking about social movements in gendered frames," *Contemporary Sociology*, 29(3), 454-462; Gibbons, S. (2022). "Gender on the agenda: Media framing of women and women of color in the 2020 U.S. presidential election." *Newspaper Research Journal*, *43*(1), 102-128; Rohrbach, Tobias, Loes Aaldering, Daphne Joanna Van der Pas (2023) "Gender differences and similarities in news media effects on political candidate evaluations: a meta-analysis." *Journal of Communication*, Volume 73(2), Pages 101–112.

[96]   See, for example, Rudman, L. A., & Glick, P. (2002). "Prescriptive gender stereotypes and backlash toward agentic women." Journal of Social Issues, 57(4), 743–762.; Eagly, A. H., & Karau, S. J. (2002). "Role congruity theory of prejudice toward female leaders." Psychological Review, 109(3), 573–598.; Brescoll, V. L. (2011). "Who takes the floor and why: Gender, power, and volubility in organizations." Administrative Science Quarterly, 56(4), 622–641.; Brescoll, V. L., & Uhlmann, E. L. (2008). "Can an angry woman get ahead? Status conferral, gender, and expression of emotion in the workplace." Psychological Science, 19(3), 268–275.; Kennedy, J. A., McDonnell, M.-H., & Stephens, N. (2016). "Does gender raise the ethical bar? Exploring the punishment of ethical violations at work." Working paper on SSRN.

[97]   See, for example, https://www.thestreet.com/investing/bill-ackman-says-hes-spent-50-million-on-herbalife-battle-12780619.

[98]   https://www.npr.org/2024/01/24/1225216895/bill-ackman-wall-street-harvard-dei-plagiarism-penn-college-free-speech.

[99]   https://www.wsj.com/articles/prosecutors-interview-people-tied-to-ackman-in-probe-of-potential-herbalife-manipulation-1426196822.

[100]   Cialdini, Robert B (1987), *Influence: The Psychology of Persuasion, Vol. 3*: A. Michel Port Harcourt; Cialdini, Robert B, Demaine, Linda J, Sagarin, Brad J, et. al (2006), "Managing social norms for persuasive

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both traditional and social media play a profound role in agenda setting—defining what aspects of an important issue are reported and keeping issues in the public sphere.[101]

42.   Changing public attitudes through strategic communication occurs when the individual or organization creates and shares a message with intermediaries between the individual and the members of the public such as the media, thought leaders, celebrities, NGOs, trade associations, and regulators. In some cases, the individual or organization may speak directly to the public, but not all individual and organizational efforts at persuasion (i.e., advertising) are direct. Instead, in complex media systems, individuals and organizations can also endeavor to persuade by shaping the broader social system through strategic communications.

C. Repairing reputational harm

i.   Repairing reputation in a complex media system

43.   When reputational harm has occurred, strategic communication can also be used to correct it. Traditional approaches to rectifying reputational harm involve attempts to repair reputation in the public sphere, through strategic communications, which can include the placement of positive messages in traditional media forms such as TV, news, magazines, and through public appearances[102] or in social media. However, social media has complicated these traditional approaches in a few ways. Some aspects of social media such as filter bubbles and echo chambers have fragmented the public sphere such that it is unclear how or where reputation

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impact" *Social Influence* Vol. 1; McCombs, Maxwell E. & Donald L. Shaw (1972), "The agenda-setting function of mass media." *Public opinion quarterly,* 36(2): 176-187.

[101]   McCombs, Maxwell E. & Donald L. Shaw (1972), "The agenda-setting function of mass media." *Public opinion quarterly,* 36(2): 176-187.

[102]   Ardia, D. S. (2010). "Reputation in a Networked World: Revisiting the Social Foundations of Defamation Law." Harvard Civil Rights-Civil Liberties Law Review, 45(2), 261-328; McCombs, Maxwell E., and Donald L. Shaw, "The Agenda-Setting Function of Mass Media," *Public Opinion Quarterly* 36, no. 2 (1972): 176–187; McCombs, Maxwell E., and Donald L. Shaw (1993). "The evolution of agenda-setting research: Twenty-five years in the marketplace of ideas." Journal of communication 43, no. 2: 58-67.

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repair can and should take place. Secondly, trust in traditional media has declined across the ideological spectrum.[103] Whereas legitimate sources of news once went unquestioned, assessing trust of the source is now a primary concern of users when assessing claims both in social and traditional media—and this is true regardless of political ideology.[104] Finally, increasing polarization[105] in the American context, both politically and culturally, means that attitudes about many topics have become more entrenched and therefore harder to change.[106] In this section, I provide a brief overview of the concepts necessary for understanding how reputational harm can occur, and be repaired, through social media.

44.   Notwithstanding increased challenges, it remains possible to repair reputational damage on social media and in the current fragmented information system. As Ardia (2010) notes:

> Although the global communication networks that are the hallmarks of our networked society have brought new reputational challenges, they also provide novel solutions to prevent and ameliorate those harms. One such solution is to enlist, through legal and social incentives, the help of private online intermediaries such as content hosts and search providers. These intermediaries play a central role in community governance and are often in a position to recognize and respond to reputational harms.[107]

45.   Reputational repair campaigns have been used successfully to remediate damaged reputations in the past. For example, Martha Stewart's reputation suffered as a result of an insider trading scandal and her ultimate conviction and sentencing to prison in 2004.[108] Ms.

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[103]   https://www.pewresearch.org/fact-tank/2021/08/30/partisan-divides-in-media-trust-widen-driven-by-a-decline-among-republicans/.

[104]   https://www.pewresearch.org/journalism/2020/01/24/democrats-report-much-higher-levels-of-trust-in-a-number-of-news-sources-than-republicans/.

[105]   https://www.pewresearch.org/politics/interactives/political-polarization-1994-2017/.

[106]   Conover, Michael, Jacob Ratkiewicz, Matthew Francisco, Bruno Gonçalves, Filippo Menczer, and Alessandro Flammini. (2011) "Political polarization on Twitter." In *Proceedings of the International AAAI Conference on Web and Social Media,* Vol. 5, No. 1, pp. 89-96; Prior, Markus (2013). "Media and political polarization." *Annual Review of Political Science* 16: 101-127.

[107]   Ardia, D. S. (2010), "Reputation in a Networked World: Revisiting the Social Foundations of Defamation Law." *Harvard Civil Rights-Civil Liberties Law Review*, 45(2), 261-328, p. 264.

[108]   https://www.nytimes.com/2004/03/06/business/martha-stewart-verdict-overview-stewart-found-guilty-lying-

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Stewart's reputational repair efforts included television advertisements addressing the scandal,[109] public relations efforts,[110] and support from other trusted influencers.[111] These efforts were largely successful in repairing Ms. Stewart's reputation, as evidenced by largely positive coverage since her scandal; major endorsement deals, (e.g., Sketchers[112] and Kohler[113]); and high-profile media engagement, such as hosting part of the Paris Olympics in 2024.[114] Other individuals who have undergone successful reputation repair campaigns include Justin Bieber[115] and Robert Downey Jr., as evidenced by their return to brand promotions[116] and major motion pictures,[117] respectively.[118]

46.   The audience for the original reputational harm persists on social media and may have limited exposure to traditional media.[119] Given the fracture of media audiences in the last 10 years, new forms of media are required to reach what was formerly a relatively unified "public" of news readers, tabloid readers, and TV viewers. Accordingly, an attempt to repair reputational harm must now account for new channels of communication alongside traditional channels, and

sale-stock.html.
[109]   https://knowledge.wharton.upenn.edu/article/brand-rehab-how-companies-can-restore-a-tarnished-image/; https://nypost.com/2005/08/02/past-perfect-oh-no-martha-ads-paint-her-as-lovable-screw-up/.
[110]   https://www.nbcnews.com/id/wbna7038465.
[111]   https://www.sfgate.com/news/article/Time-well-spent-Martha-Stewart-leaves-prison-2694543.php.
[112]   https://www.marthastewart.com/martha-stewart-skechers-commercial-super-bowl-lix-8788822.
[113]   https://www.kohler.com/en/press-room/martha-stewart-cast-iron-ambassador-press-release.
[114]   https://www.nbcnews.com/id/wbna7038465; https://www.businessinsider.com/martha-stewart-career-timeline-model-empire-prison#in-2020-stewart-caused-an-online-frenzy-when-she-posted-a-poolside-thirst-trap-on-instagram-13; https://www.marthastewart.com/martha-stewart-snoop-dogg-paris-olympics-2024-8690204.
[115]   See, for example, https://www.inc.com/graham-winfrey/justin-bieber-s-manager-on-the-secret-to-better-branding.html.
[116]   https://people.com/justin-bieber-reacts-to-wife-hailey-bieber-nyc-billboard-11808995 and https://www.forbes.com/sites/conormurray/2025/07/10/justin-bieber-announces-music-comeback-new-album-reportedly-drops-friday/, archived at https://archive.ph/6Xcts.
[117]   https://www.imdb.com/name/nm0000375/ and https://fandomwire.com/primitive-war-2-director-reveals-robert-downey-jr-s-influence-that-sets-up-the-sequel/.
[118]   https://www.nytimes.com/2008/04/20/movies/20carr.html.
[119]   https://www.pewresearch.org/journalism/2020/01/24/democrats-report-much-higher-levels-of-trust-in-a-number-of-news-sources-than-republicans/.

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for the importance of sources in the communication process.[120]

47.   Social media is a hybrid of mass and face-to-face communication.[121] In mass media like

television or news, one source sends messages to many readers or viewers (known as one-to-

many communication). In face-to-face distribution of rumors, messages are transmitted from one

person to another, usually one at a time. In social media, messages are transmitted both through

hubs (one-to-many) and dyadically, creating chains of messages called information cascades.[122]

The time it takes for the message to move from one person to another in the information cascade

is typically a day for traditional media but can be only a few hours to seconds for online

communication, leading to rapid dissemination of both true and false news.[123]

ii.   Media exposure and counter-attitudinal attitude change

48.   To understand how to assess the costs for repairing reputational harm, one must

understand the process of attitude change, also known as persuasion.[124] A reputation repair

campaign should target the audience(s) that have been exposed to and are likely to have believed

the harmful information. Several factors influence this process, including how entrenched the

belief is to the audience, as well as the source and format of the persuasion campaign.

49.   For someone who holds no attitude about someone or something, a single exposure to a

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[120]   Austin, L., Fisher Liu, B., & Jin, Y. (2012). "How Audiences Seek Out Crisis Information: Exploring the Social-Mediated Crisis Communication Model." *Journal of Applied Communication Research*, 40(2), 188–207; Wang, Yuyan, Jeong-Nam Kim, & Bey-Ling Sha (2021). "When public relations meets social media: A systematic review…" Public Relations Review, 47(4), 102081. Map of 2006–2020 research trends.
[121]   Humphreys, A. (2015). *Social Media: Enduring Principles*, Oxford University Press.
[122]   Humphreys, A. (2015). *Social Media: Enduring Principles*, Oxford University Press.
[123]   Pfeffer, J., Zorbach, T., and Carley, K.M. (2014). "Understanding Online Firestorms: Negative Word-of-Mouth Dynamics in Social Media Networks." *Journal of Marketing Communications*, 20 (1-2): 117-28; Vosoughi, S., Roy, D., and Aral, S. (2018). "The spread of true and false news online," *Science*, 359: 1146-1151.
[124]   Cialdini R. B., R. E. Petty, J. T. Cacioppo. (1981). "Attitude and Attitude Change." *Annual Review of Psychology*, 32, 357-404.

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message from a reasonably credible source is likely to be enough to change attitudes.[125]

However, for someone with an existing belief, source and message quality become important,

and changing that belief requires more than a few exposures from a single source.[126] Due to

confirmatory bias,[127] people are likely to attend to information that confirms or is congruent with

their existing beliefs and ignore or discount information that is counter to them. The more

entrenched the belief, the more exposures are required to change attitudes.[128]

50.   In addition, source, message, and even media type can play a role in how many exposures

it requires to change attitudes.[129] Information is more likely to change attitudes if it comes from a

trusted source.[130] Further, changing an attitude that is counter to one's existing set of beliefs—

particularly when those beliefs are entrenched and/or when the initial impression is created

through a format assumed to be trustworthy—is exceedingly hard and typically requires multiple

messages from multiple trusted sources.[131]

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[125]   Cialdini R. B., R. E. Petty, J. T. Cacioppo. (1981). "Attitude and Attitude Change." *Annual Review of Psychology*, 32, 357-404.

[126]   Cialdini R. B., R. E. Petty, J. T. Cacioppo. (1981). "Attitude and Attitude Change." *Annual Review of Psychology*, 32, 357-404.

[127]   Tversky, Amos, and Daniel Kahneman (1974). "Judgment under Uncertainty: Heuristics and Biases: Biases in judgments reveal some heuristics of thinking under uncertainty." *Science* 185, no. 4157: 1124-1131.

[128]   Cacioppo, John T and Richard E Petty (1980), "Persuasiveness of Communications Is Affected by Exposure Frequency and Message Quality: A Theoretical and Empirical Analysis of Persisting Attitude Change," *Current issues and research in advertising*, 3 (1), 97-122; Olson, J.M. and Zanna, M.P. (1993). "Attitudes and attitude change." *Annual review of psychology*, 44(1), pp.117-154.

[129]   Albarracin, D., and Shavitt, S. (2018). "Attitudes and attitude change." *Annual Review of Psychology*, 69, 299–327; Cialdini R. B., R. E. Petty, J. T. Cacioppo (1981). "Attitude and Attitude Change." *Annual Review of Psychology*, 32, 357-404. See, also, Meyers-Levy, J., & Malaviya, P. (1999). "Consumers' Processing of Persuasive Advertisements: An Integrative Framework of Persuasion Theories." *Journal of Marketing*, 63(4_suppl1), 45-60.

[130]   Pornpitakpan, Chanthika (2004). "The persuasiveness of source credibility: A critical review of five decades' evidence." *Journal of applied social psychology* 34(2): 243-281; Hovland, Carl I., and Walter Weiss (1951). "The influence of source credibility on communication effectiveness." *Public opinion quarterly* 15(4): 635-650.

[131]   Cacioppo, John T and Richard E Petty (1980), "Persuasiveness of Communications Is Affected by Exposure Frequency and Message Quality: A Theoretical and Empirical Analysis of Persisting Attitude Change," *Current issues and research in advertising*, 3(1), 97-122; Wegener, Duane T., Natalie D. Smoak, Richard E. Petty, and Leandre R. Fabrigar. "Multiple routes to resisting attitude change." In *Resistance and persuasion*, pp. 13-38. Psychology Press, 2004.; Petty, Richard E., Duane T. Wegener, and Leandre R. Fabrigar (1997). "Attitudes and attitude change." *Annual review of psychology* 48, no. 1: 609-647.

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51.   With traditional media sources, a repair campaign must account for the new and complex technological infrastructure for communication. A trusted source means a person or entity that is trusted by the targeted user or reader, not necessarily a source that would be deemed trustworthy by the public at large.

52.   On social media, attitude change can be even more complex. Filter bubbles mean that users are likely to see only information that is congruent with their beliefs and behaviors[132] and that comes from selective media sources that viewers trust.[133] Due to homophily (the tendency to like people who are similar), we tend to know and follow others who have the same attitudes that we do. This kind of filter bubble exacerbates problems of confirmation bias because, as Garrett (2009)[134] notes, multiple messages coming from multiple sources about the same event or fact create the impression for the user that the event is indeed true and that the belief is universally held.

53.   Persuasion online now also includes influencers, social networking platforms, and live video in addition to search and display advertising. Remediation for reputational harm entails working with multiple sources that consumers trust to counter false claims. Social capital (i.e., how many people you know) and status (i.e., legitimacy) of a source is important. Messages that come from sources with no social capital (e.g., no followers) do not have the same strength as those that come from sources with considerable social capital.[135] Because people typically do not

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[132]   Pariser, Eli (2011), *The Filter Bubble: What the Internet Is Hiding from You.*. New York: Penguin Press.
[133]   https://www.pewresearch.org/journalism/2020/01/24/democrats-report-much-higher-levels-of-trust-in-a-number-of-news-sources-than-republicans/.
[134]   Garrett, R. K. (2009). "Echo chambers online? Politically motivated selective exposure among Internet news users." *Journal of computer-mediated communication*, 14(2), 265-285.
[135]   Kruglanski, A. W., and Gigerenzer, G. (2011). "Intuitive and deliberate judgments are based on common principles": Correction to Kruglanski and Gigerenzer (2011). *Psychological Review*, 118(3), 522–522. https://doi.org/10.1037/a0023709.

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trust unfamiliar sources online,[136] known and trusted sources are particularly important when communicating messages attempting to change attitudes online.[137] In this sense, attitude change requires the message to come from *inside* the filter bubble and requires the inclusion of a number of trusted sources within the echo chamber to influence opinion.

54.   Additionally, attitude change is complicated when counter-narratives continue to exist alongside corrective messaging. When people are already invested in a particular narrative, corrective messages can create cognitive dissonance. In response, individuals often defend their original beliefs and resist correction.[138] This is compounded by confirmation bias, where individuals preferentially seek out and trust information that aligns with their preexisting views, making them more resistant to corrections.[139] In contrast to the novelty and sensational nature of false information, corrective messages are typically more fact-based and nuanced, which may make them less engaging or viral.[140] Further, the mere presence of a counter-narrative can create a perception of uncertainty or equivalence (e.g., "both sides have a point"), weakening the impact of corrective messages. Placing messages with trusted sources can help to overcome the obstacles faced when the false narrative continues to spread alongside corrective messages.

PART 1 – ONLINE NARRATIVE PRIOR TO LAWSUIT FILING

55.   In this part of my report, I assess the impact of the Defendants' retaliation campaign on

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[136]   Metzger, M. J., and Flanagin, A. J. (2013). Credibility and trust of information in online environments: The use of cognitive heuristics. *Journal of Pragmatics*, 59, 210–220.

[137]   Liu, Shixi, Cuiqing Jiang, Zhangxi Lin, Yong Ding, Rui Duan, and Zhicai Xu (2015), "Identifying Effective Influencers Based on Trust for Electronic Word-of-Mouth Marketing: A Domain-Aware Approach," *Information Sciences*, 306, 34-52.

[138]   Ross, L., & Lepper, M. (1979). "Biased assimilation and attitude polarization: The effects of prior theories on subsequently considered evidence." *Journal of Personality and Social Psychology, 37*(11), 2098–2109; Kunda, Z. (1990). "The case for motivated reasoning." *Psychological bulletin*, *108*(3).

[139]   Tversky, Amos, and Daniel Kahneman (1974). "Judgment under Uncertainty: Heuristics and Biases: Biases in judgments reveal some heuristics of thinking under uncertainty." *Science* 185, no. 4157: 1124-1131.

[140]   Vosoughi, S., Roy, D., and Aral, S., (2018), "The spread of true and false news online," *Science*, 359: 1146-1151, p. 1149-1150.

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Ms. Lively's reputation. This campaign took place in August 2024, meaning it preceded the filing of her initial Complaint in December 2024 and the publication of the At-Issue Statements in December 2024 and January 2025. I rely on both my own research and analysis in addition to work performed by Dr. Dina Mayzlin, who, as noted above, I understand is another expert retained by the Plaintiff in this matter.

VI. MS. LIVELY'S REPUTATION WAS DAMAGED PRIOR TO THE FILING OF THE LAWSUIT

56.   To assess whether and to what extent Ms. Lively's reputation was harmed by the retaliation campaign, I consider the volume, sentiment, and content of posts published about Ms. Lively on X, Reddit, and YouTube. I also review popular social media posts across other platforms, assess Google search data, and review tabloid coverage of her during this time. Through these analyses, I assess what impact, if any, the retaliation campaign had on Ms. Lively's reputation, both before and after the filing of Ms. Lively's initial Complaint in December 2024. Finally, I discuss how the introduction of new negative associations and/or the strengthening of existing negative associations harmed Ms. Lively's reputation and discuss some of the likely professional and personal impacts.

A. The retaliation campaign elevated conversation about several negative topics related to Ms. Lively in August 2024

i.   Indicators of a retaliation campaign

57.   An online campaign impacts the reputation of a person brand if the campaign leads to increased volume of conversation, an increase in negative consumer sentiment toward the subject, and the introduction of new negative associations and/or the strengthening of existing negative associations with that person brand. Dr. Mayzlin's assignment, as relevant to my analysis, was "to evaluate whether there is evidence of manipulation of online conversations

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allegedly financed and/or executed by Defendants" related to Ms. Lively.[141]

58.   Dr. Mayzlin found that there was evidence of a "retaliation campaign," which "appears to have begun in August 2024 with the objective of seeding and amplifying negative information about" Ms. Lively.[142] She noted that that "online conversations can be strategically created or shaped by individuals, firms, or coordinated actors" and that "these actors can surreptitiously manipulate online conversations to discredit individuals or brands."[143] Indeed, she found "evidence that the Defendants manipulated online conversations about Ms. Lively."[144]

> **ii.   Narratives elevated by the retaliation campaign introduced new negative associations and strengthened existing negative associations with Ms. Lively**

59.   I understand that Dr. Mayzlin conducted her analysis of the retaliation campaign by reviewing the prevalence of four major narratives about Ms. Lively that were "seeded" and "amplified"[145] on X, YouTube, and Reddit in August 2024:

- "Production members lost their jobs due to [Ms. Lively's] takeover and insisted upon involvement – including loss of budget due to rescheduling shoot days when [Ms. Lively] refused to show up"

- "When [Ms. Lively] wasn't able to get her way on set or behind the scenes, she involved her husband to create an imbalance [sic] of power between her and [Mr. Baldoni]. [Mr. Reynolds] went so far as to use his power to call agents and agencies, Sony, and other key players so that [Ms. Lively] would get her way"

- "[Ms. Lively]'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"

- "There is a clear, likely motive due to the film's value and fanbase, in which [Ms. Lively] is attempting to bully her way into buying the rights for It Starts With Us"[146]

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[141]   Mayzlin Report, ¶7.
[142]   Mayzlin Report, ¶12.
[143]   Mayzlin Report, ¶46.
[144]   Mayzlin Report, ¶34.
[145]   Mayzlin Report, ¶12.
[146]   Mayzlin Report, ¶67; Second Amended Complaint, Exhibit D.

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60.   As outlined in detail below, Dr. Mayzlin also found that these campaign narratives were widely discussed online in August 2024 and that, conversely, there was no meaningful volume of discussion of any of these narratives prior to this time.[147] Additionally, Dr. Mayzlin found that the discussion of the campaign narratives was associated with increased negative sentiment about Ms. Lively.[148]

61.   I also understand that Dr. Mayzlin found an increase in the association of Ms. Lively with certain illustrative negative phrases connected to the narratives of the retaliation campaign. In particular, she "analyzed the volume trend over time" in her dataset for each: "mean girl," "bully," and "tone deaf."[149] Accordingly, I focus my analysis of the impact of the retaliation campaign on Ms. Lively's reputation regarding these four campaign narratives as well as the negative associations of "mean girl," "bully," and "tone deaf."

B. During the campaign period, a rise in the volume of conversation about Ms. Lively occurred alongside increasing negative sentiment toward Ms. Lively

62.   Dr. Mayzlin reviewed the volume and sentiment of online discussion of Ms. Lively over time. The overall volume of discussion about a topic can be informative for understanding reputational harm because the greater the volume of discussion, the more consumers participate in and/or are exposed to information that shapes attitudes on reputation. The sentiment of posts is helpful in assessing the potential reputational impact of the retaliation campaign because it offers insight into the positivity or negativity of the associations and the degree to which they spread. If Ms. Lively's reputation was harmed, I would expect to see an increase in the overall volume of discussion about her alongside an increase in negative sentiment toward her.

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[147]   Mayzlin Report, ¶84.
[148]   Mayzlin Report, ¶84.
[149]   Mayzlin Report, ¶58.

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63.   Dr. Mayzlin found that the volume of online discussion about Ms. Lively on X, Reddit, and YouTube sharply increased in August, rising from a weekly count of fewer than 1,800 posts in the week ending July 14, 2024, to nearly 80,000 posts during the week ending in August 18, 2024, which was "consistent with the onset of the 'retaliation campaign.'"[150] Dr. Mayzlin also found that negative sentiment toward Ms. Lively increased over this same period.[151] As noted above, the increase in negative sentiment also coincided with the emergence of negative associations that related to the campaign narratives.

64.   Dr. Mayzlin found that the volume of posts about Ms. Lively mentioning the terms "mean girl," "bully," and/or "tone-deaf" also increased sharply in August 2024.[152] She found that the portion of the online conversation about Ms. Lively using the term "mean girl" jumped from almost no portion of the conversation in May, June, and July, to nearly four percent in mid-August.[153] The prevalence of the term "tone deaf" similarly increased significantly in mid-August, peaking the week of August 18 at nearly three percent of all posts about Ms. Lively.[154] The term "bully" also noticeably increased the same week and persisted into early 2025.[155]

65.   The rapid increase in discussion of Ms. Lively, coupled with the introduction of these negative associations, suggests that the August 2024 time period likely had a significant impact on Ms. Lively's reputation. Many people were exposed to and/or engaged in conversations about her during this time, and the negative associations of "mean girl," "bully," and "tone deaf" were prevalent in the overall conversation about Ms. Lively. As discussed above, research shows that

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[150]   Mayzlin Report, ¶56.
[151]   Mayzlin Report, ¶65, 76, 79, Figure 9, and Figure 10.
[152]   Mayzlin Report, ¶59. Based on my analysis in Section X.B below and my expertise in text analysis, 4% is a notable portion of the conversation relative to other keywords.
[153]   Mayzlin Report, Figure 4.
[154]   Mayzlin Report, Figure 6.
[155]   Mayzlin Report, Figure 5.

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negative information is "stickier" than positive information in that it makes a more lasting impression on the people who hear or see it.[156] This effect is amplified on social media because people are more receptive to the statements when they observe multiple people in their network sharing and endorsing them.[157]

C. Online and traditional media featuring campaign narratives about Ms. Lively generated millions of impressions

66.   As noted above, Dr. Mayzlin found that beginning in August 2024, negative themes began to emerge online that associated Ms. Lively with terms such as "bully," "mean girl," and "tone deaf."[158] To assess the impact of these themes, I collected posts on social media networks and TV broadcasts that associated Ms. Lively with one or more of the terms "bully," "mean girl," and "tone deaf"[159] and calculated the number of impressions on these posts.

67.   Calculating the number of impressions requires itemizing and then summing the impressions from each source that contained the content of interest: in this case, posts associating Ms. Lively with the terms "bully," "mean girl," or "tone deaf." To do so, I gathered and summed the impressions from: (a) social media, such as TikTok and X, (b) online websites and/or articles, and (c) traditional media like television that contained one of the keywords and reference to Ms. Lively.[160]

68.   In total, after August 2024, online and traditional media that associated Ms. Lively with

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[156]   Taylor, S.E., (1991), "Asymmetrical Effects of Positive and Negative Events: The Mobilization-Minimization Hypothesis," *Psychological Bulletin*, 110(1): 67-85; Vosoughi, S., Roy, D., and Aral, S., (2018), "The spread of true and false news online," *Science*, 359: 1146-1151, pg. 1147-1148; Skurnik, I., (2005), "Special Session Summary Rumors, Refutations, and Conflicts of Interest: Problems in Dealing With Unreliable Information," *Association for Consumer Research*, pg. 274-276.

[157]   Pfeffer, J., Zorbach, T., and Carley, K.M. (2014), "Understanding Online Firestorms: Negative Word-of-Mouth Dynamics in Social Media Networks," Journal of Marketing Communications, 20 (1-2): 117-28.

[158]   Mayzlin Report, ¶59.

[159]   I include in my analysis minor variations on these terms (*e.g.*, "bullying," "mean girlies").

[160]   For more detail on the calculation of impressions, refer to Section IX.A below.

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one or more of these terms generated over 176 million impressions,[161] as summarized in Figure 2.[162]

Figure 2. Impressions of media linking Ms. Lively to the negative terms "bully," "mean girl," and "tone deaf"

Source	Impressions
TikTok	103,176,555
YouTube	27,391,813
Instagram	8,721,199
Facebook	6,873,200
X	19,384,014
TV News	11,192,000
Total	**176,738,781**

69.   My estimate of the number of impressions of posts and broadcasts associating Ms. Lively with one of the above terms is conservative for several reasons. First, as discussed in more detail below, it is challenging to search online video content through standard search tools. As a result, locating and verifying online video content is time-consuming and incomplete, meaning many instances of video-based dissemination are likely omitted from my impression estimate. I also do not include posts from platforms that do not report impression metrics, such as Reddit. Finally, I have not included in my calculation instances of Ms. Lively being associated with these negative phrases without the inclusion of the term itself. For example, posts that describe Ms. Lively as a

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[161]   I calculated impressions for posts on social media platforms based on metrics provided by the platforms themselves. Specifically, I rely on view counts made directly available by the platform for each of TikTok, YouTube, Instagram, Facebook, and X. For TV News, I rely on public reports of viewership for each program. More detail on my impressions calculation for each platform is available in Section IX, below.

[162]   A full list of posts and broadcasts included in this analysis is included as Appendix E. Posts were found through searches online, e.g., through searches on various platforms and Google searches that specified the keyword, platform (e.g. tiktok.com), and timeframe. They were then checked to ensure that the post contained the keyword used in reference to Ms. Lively.

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"tyrant,"[163] "as "rude,"[164] or as being "out of touch"[165] in her marketing of *It Ends With Us* are not included in my assessment, even though they express the same substance as the key phrases. Nonetheless, the substantial number of impressions of posts that establish associations between Ms. Lively and the terms "mean girl," "bully," or "tone deaf" is another indicator that the retaliation campaign in August 2024 had negative impacts on Ms. Lively's reputation.

D. Harm to Ms. Lively's reputation that occurred during the campaign period is evident in search engine data, tabloid coverage, and social media discussions

70.   In this section, I conduct additional analyses to further assess the harm to Ms. Lively's reputation in August 2024. I first review Google Trends data to assess how search interest in Ms. Lively evolved during the campaign period and whether or not the campaign topics represented a noticeable share of search interest in Ms. Lively. I then review tabloid media coverage of Ms. Lively to assess the spread and impact of articles about Ms. Lively on her reputation, including articles that I understand were written in coordination with the Defendants. I next review posts on social media platforms to assess the extent to which the new negative associations appear elsewhere. Finally, I compare terms associated with Ms. Lively before and after the retaliation campaign in August 2024.

i.   Google Trends data indicates interest in Ms. Lively increased in August 2024

71.   One method of measuring the volume of interest in Ms. Lively is via Google Trends, which is a free tool that allows users to compare relative search interest on up to five different search terms and topics. Data on Google Trends are presented on a relative scale from 0 to 100, indexed to the peak search volume achieved during the period of interest.[166] Google Trends also

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[163]   E.g., https://www.youtube.com/watch?v=sM98NYMS9R0 .
[164]   E.g., http://tiktok.com/@metroentertainment/video/7403709890486684960.
[165]   E.g., https://www.tiktok.com/@calabasaswings/video/7403089893598956832.
[166]   https://support.google.com/trends/answer/4365533?hl=en.

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provides information about other terms frequently searched with the term or topic of interest, providing information about the topics people associate with certain search queries.[167]

72.   I performed a Google Trends search for "Blake Lively" as a topic covering the period from January 1, 2004, (the earliest period that data is made available through Google Trends) to August 6, 2025. As shown in Figure 3 below, consumer search interest in Ms. Lively first increased in June 2005, directly following the May 31, 2005, release date of her first film, *The Sisterhood of the Travelling Pants*.[168]

Figure 3. Search interest for the "Blake Lively (American Actress)" topic from 2004 to 2025
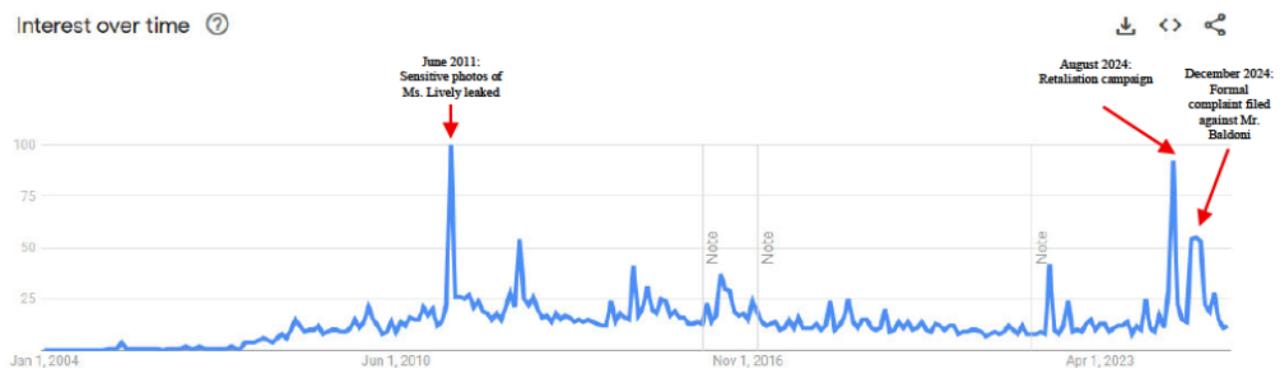
73.   In the more than 20 years since Ms. Lively first rose to prominence, the period of time with the second[169] largest volume of consumer search interest in Ms. Lively took place during

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[167]   https://support.google.com/trends/answer/4355000?hl=en&sjid=8172751319134865217-NC.

[168]   https://trends.google.com/trends/explore?date=all&q=blake%20lively&hl=en. I also attempted a search of "Blake Lively" as a search term, finding no qualitative difference between the two (https://trends.google.com/trends/explore?date=all&q=blake%20lively,%2Fm%2F06_bq1&hl=en).

[169]   Following an alleged leak of sensitive photos of Ms. Lively and other celebrities in 2011 there was a spike in searches of anomalous proportions, but I did not see evidence to suggest significant interest in or discussion of these photos continued into the interim decade. See, https://www.dailymail.co.uk/tvshowbiz/article-1393181/Blake-Lively-nude-pics-Photos-100-fake-says-Gossip-Girl-star.html. During mid-2011 when the leak occurred, top associated topics included photography and nude photography, see https://trends.google.com/trends/explore?date=2011-06-01%202011-07-01&q=%2Fm%2F06_bq1&hl=en-GB. These terms did not appear in later years, see, https://trends.google.com/trends/explore?date=2014-01-01%202024-01-01&q=%2Fm%2F06_bq1&hl=en-GB.

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August 2024.[170] During that month, the increase in searches began on August 6 and peaked on

August 17 with searches at a rate around four times higher than the first week of August before

the increase, as shown in Figure 4 below.

Figure 4. Search interest for Blake Lively in August 2024[171]
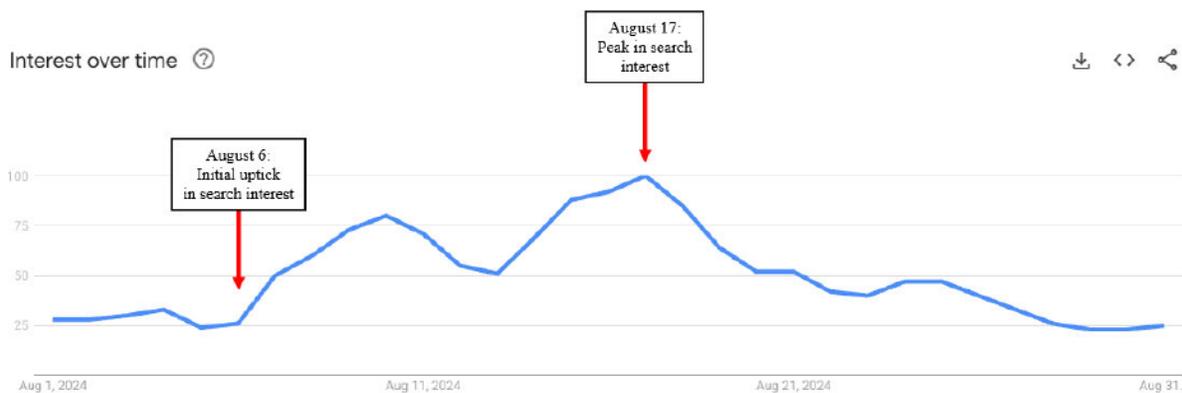
74.   That consumer interest in Ms. Lively as measured by Google Trends data reached its

highest point in over a decade – a period of time that includes many widely discussed career and

personal milestones for Ms. Lively – is remarkable and is reflective of the significant impact that

online media during this period is likely to have had on Ms. Lively's reputation.

ii.   Tabloid coverage influenced consumer perception of Ms. Lively, including through articles placed by the Defendants

75.   Tabloids and other celebrity-focused publications have long been a key outlet for

celebrity news and gossip, as noted in Section V above. As discussed, tabloid readers are

influenced by stories in these publications, even if they understand the credibility provided by

tabloids is different than that provided by "credible" or "serious" news publications.[172] Public

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170   https://trends.google.com/trends/explore?date=all&q=blake%20lively&hl=en.
171   https://trends.google.com/trends/explore?date=2024-08-01%202024-08-31&q=blake%20lively&hl=en.
172   Foos, F., & Bischof, D. (2022). "Tabloid media campaigns and public opinion: Quasi-experimental evidence on Euroscepticism in England." *American Political Science Review*, *116*(1), 19-37.

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relations efforts for celebrities often include efforts to influence tabloid media coverage, which is

consumed and internalized by the public. I understand that during campaign period, the

Defendants played a role in the publication of negative tabloid stories about Ms. Lively.[173] In this

subsection, I first review several specific stories about Ms. Lively and then consider the

overarching themes of tabloid stories about Ms. Lively during August 2024.

76.   One article that I understand was published in coordination with the Defendants is an

August 27, 2024, article in *Variety* titled "'It Ends With Us' Sequel in Doubt Amid Blake

Lively-Justin Baldoni Feud: 'There's Probably No World Where They Work Together

Again'."[174] The article quotes "insider sources" that suggest Ms. Lively inserted herself into a

directorial and writing role, which was "news to Baldoni."[175] The article also mentions the

criticism Ms. Lively has faced for the way she marketed the film. These allegations relate to the

campaign narratives discussed previously, such as Ms. Lively's attempt to "bully" others for

control of *It Ends With Us*.

77.   Articles in the *Daily Mail* that I understand were developed in coordination with the

Defendants are also critical of Ms. Lively. One article, published on August 17, 2024, refers to

Ms. Lively as being "embroiled in controversy" and speculates that she is "'relying' on her best

friend Taylor Swift to help get her through the recent media 'storm,' and is hoping to 'use their

friendship' to distract from the drama."[176] The article also calls Ms. Lively's promotion of the

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[173]   An estimate of the impressions generated by these articles as well as other content I understand was
         developed in coordination with the Defendants can be found in Appendix D. I understand this may not be an
         exhaustive list. Further, this estimate does not include impressions generated from social media shares of the
         tabloid articles. See, for example, https://x.com/Daily_MailUS/status/1824771655693992239,
         https://x.com/DailyMail/status/1826070385663610936, and
         https://x.com/Variety/status/1828462980415267285.
[174]   BBKOSLOW-000006800.
[175]   https://variety.com/2024/film/news/it-ends-with-us-sequel-in-doubt-blake-lively-justin-baldoni-feud-
         1236114099/.
[176]   NATHAN_000003433; Case Deposition, 259: 2-15; https://www.dailymail.co.uk/tvshowbiz/article-

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movie "tone-deaf."[177] Another *Daily Mail* story I understand was developed in coordination with

the Defendants, published on August 20, 2024, asserts: "Lively's launch of her new film, It Ends

With Us, has been an unmitigated disaster."[178] The article brings up the criticism of Ms. Lively's

promotion of the film, referencing the "wear your florals" quote, and includes a list of other

controversies and "bitchy comments" from Ms. Lively.[179]

78.   I also understand the Defendants discussed sharing a *Daily Mail* article discussing a

recently resurfaced 2016 interview with Ms. Lively.[180] The reporter, Kjersti Flaa who was quoted

describing the "uncomfortable" interview that "made her want to QUIT her job" in the *Daily*

Mail article circulated internally among the Defendants.[181] The YouTube video of the interview

was popular, and was viewed over 7.2 million times.[182] Several other publications also published

articles about the interview including *Buzzfeed*,[183] the *New York Post*,[184] and *Page Six*.[185]

79.   I understand that TAG and Ms. Abel engaged with multiple tabloid journalists in late July

and August 2024 to assist in placing stories affecting the narratives regarding Ms. Lively in the

media, including by influencing coverage to be more favorable as to Mr. Baldoni by contrast. For

example, Ms. Abel assisted in providing information to, and placing information with, reporters,

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        13750525/blake-lively-taylor-swift-copied-friendship-justin-baldoni-drama.html.

[177]   BBKOSLOW-000008194; KCASE-000002821; Koslow Deposition, 312:2-8;
        https://www.dailymail.co.uk/tvshowbiz/article-13750525/blake-lively-taylor-swift-copied-friendship-justin-
        baldoni-drama.html.

[178]   https://www.dailymail.co.uk/femail/article-13761985/How-Blake-Livelys-fairytale-turned-PR-nightmare-
        Amid-growing-backlash-ALISON-BOSHOFF-reveals-went-wrong-Hollywoods-golden-girl.html, archived at
        https://archive.ph/wbYGw.

[179]   https://www.dailymail.co.uk/femail/article-13761985/How-Blake-Livelys-fairytale-turned-PR-nightmare-
        Amid-growing-backlash-ALISON-BOSHOFF-reveals-went-wrong-Hollywoods-golden-girl.html, archived at
        https://archive.ph/wbYGw.

[180]   KCASE-000003354.

[181]   https://www.dailymail.co.uk/femail/article-13742877/reporter-blake-lively-interview-quit-ends-feud.html.

[182]   https://www.youtube.com/watch?v=F2-2RBi1qzY.

[183]   https://www.buzzfeednews.com/article/stephaniesoteriou/rude-2016-blake-lively-interview-journalist-quit.

[184]   https://nypost.com/2024/08/14/entertainment/reporter-calls-out-blake-lively-for-uncomfortable-interview.

[185]   https://pagesix.com/2024/08/16/parents/blake-lively-interviewer-reveals-infertility-after-bump-comment/.

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including a friend who wrote for People Magazine, Fox News, In Touch, and US Weekly at the

end of July 2024.[186] Ms. Nathan was in contact with the Daily Mail, NY Post, TMZ, and Deux

Moi to discuss the "situation… involving Justin and Blake".[187]

80.   I further understand that certain phrases that appeared in coverage in news and tabloid

articles were pushed into the public domain as part of a strategic communications strategy by the

Defendants, including references to "friction" on the set of *It Ends With Us*[188] and the notion that

Mr. Baldoni was "navigating complex personalities."[189] These phrases appeared in a number of

articles, allowing the Defendants to "get ahead or to normalize" narratives to navigate questions

about what happened on the set of *It Ends With Us*.[190] Articles in *Elle*,[191] *People*,[192] *Today*,[193] *E

Online*,[194] PerezHilton.com,[195] *Collider*,[196] *TMZ*,[197] *Yahoo*,[198] *Buzzfeed*,[199] and others use the

"friction" and "complex personalities" language in discussing Ms. Lively. Mr. Baldoni's

interview with *Elle* about the "friction" on the set were also posted to TikTok where two clips

together received over 1.6 million views.[200] These planted tabloid articles also tie into the

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[186]   Deposition of Jennifer Abel, 234:24-238:7; JONESWORKS_00013779.
[187]   Deposition of Melissa Nathan, 177:17-184:21 (acknowledging communications with Deux Moi, Daily Mail, NY Post, TMZ); 188:6-191:17 (acknowledging proactive call to Deux Moi to "make her aware of" a situation involving "Justin and Blake"); JONESWORKS_00015395 (discussion with Sara Nathan from NY Post editing language of article); NATHAN_000001924 (discussion with Deux Moi); JONESWORKS_00016275 (Abel texts Nathan in response to Hollywood Reporter and Daily Mail articles sent, "I can tell you've done a lot of work here").
[188]   KCASE-000001079/BBKOSLOW-000002985.
[189]   KCASE-000002821; KCASE-000001079/BBKOSLOW-000002985.
[190]   Abel Deposition, 169:25-170:4; 185:7-21.
[191]   https://www.elle.com/uk/life-and-culture/culture/a61823800/justin-baldoni-interview/#r3z-addoor.
[192]   https://people.com/justin-baldoni-friction-making-it-ends-with-us-with-blake-lively-8693848.
[193]   https://www.today.com/popculture/movies/justin-baldoni-it-ends-with-us-interview-rcna165792.
[194]   https://www.eonline.com/news/1405962/justin-baldoni-details-working-with-complex-personalities-on-it-ends-with-us.
[195]   https://perezhilton.com/justin-baldoni-talks-challenge-working-with-complex-personalities-it-ends-with-us-amid-blake-lively-beef/.
[196]   https://collider.com/it-ends-with-us-feud-blake-lively-justin-baldoni/.
[197]   https://www.tmz.com/2024/08/12/blake-lively-justin-baldoni-feud/.
[198]   https://www.yahoo.com/entertainment/ends-us-cast-drama-behind-174742487.html.
[199]   https://www.buzzfeed.com/larryfitzmaurice/justin-baldoni-friction-making-it-ends-with-us.
[200]   https://www.tiktok.com/@elleuk/video/7408205773366447393 and https://www.tiktok.com/@elleuk/video/7402270193398861088.

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campaign narratives, gendered frames, and spread negative associations about Ms. Lively
throughout the media system.

81.   News and tabloid articles about Ms. Lively were frequently published during the time
period of the retaliation campaign. Negative articles about Ms. Lively were published in a range
of media outlets, including *Daily Mail, Us Weekly, Page Six, TMZ, and World of Reel.*[201] In
addition to the "little bump" interview, other older interviews resurfaced in the same period,
notably some in which Ms. Lively used the word "tranny," garnering a "barrage of criticism" on
social media,[202] and playing into the campaign narratives. As discussed in Section V, media
frames that activate gender stereotypes and highlight perceived moral transgressions tend to be
highly sticky and widely circulated, as in patterns of rumor or gossip.

82.   Another common theme from this stretch of reporting on Ms. Lively was the assertion
that she had "sidelined" Mr. Baldoni in the production of *It Ends With Us*,[203] which also relates
to the campaign narratives. *Us Weekly* reported that there were "two camps" on the set of the
film — "team Blake and team Justin" — setting the tone for "the negative experience behind the
scenes."[204] According to *World of Reel*, Ms. Lively "took over" Mr. Baldoni's editing process
despite his version of the film scoring higher with audiences with the help of her husband who
"basically took over the movie and buddied up with author Colleen Hoover to see that their cut

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[201]   See, for example, https://www.usmagazine.com/entertainment/news/inside-blake-lively-and-justin-baldonis-it-ends-with-us-feud/; https://www.dailymail.co.uk/tvshowbiz/article-13755441/Blake-Lively-slur-transgender.html; https://pagesix.com/2024/08/16/entertainment/justin-baldoni-felt-sidelined-by-blake-lively-on-it-ends-with-us-set-report/; https://www.worldofreel.com/blog/2024/8/8/it-ends-with-us-director-fought-with-blake-lively-over-final-cut.

[202]   https://www.dailymail.co.uk/tvshowbiz/article-13755441/Blake-Lively-slur-transgender.html.

[203]   https://pagesix.com/2024/08/16/entertainment/justin-baldoni-felt-sidelined-by-blake-lively-on-it-ends-with-us-set-report/; https://www.usmagazine.com/entertainment/news/inside-blake-lively-and-justin-baldonis-it-ends-with-us-feud/.

[204]   https://www.usmagazine.com/entertainment/news/inside-blake-lively-and-justin-baldonis-it-ends-with-us-feud/.

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won."[205]

83.   Comments on tabloid articles also reiterate the "mean girl," "bully," and "tone deaf" themes from the retaliation campaign. For example, one user stated that it "sounds like she is the bully. A cry bully."[206] Another user stated "Yeah, but that is her pb. She has no clue. That is why the film will tank and she is trying to direct blame at him. typical bully."[207] Other comments describe Ms. Lively as a "mean girl," stating "Mean girls are a dime a dozen, she got identified"[208] and "She's a mean girl!"[209] In other comments, Ms. Lively was described as a "tone-deaf bubblehead," as "shallow, blinkered, tone-deaf, and deeply commercially oriented," and that her actions were "disgusting and completely tone deaf."[210] One comment goes on at length, calling for Ms. Lively to be "cancelled" because she is a "mean girl": "Blake Lively is a conceited, manipulative, mean girl to all but her small core of friends. She thinks just talking to someone one time makes them a friend. She acts like everyone wants to be her friend but I would bet there are many who don't speak out for fear of not getting jobs. She has been like this forever but over time, truth wins out. She should be cancelled because she is a shallow fake and not a talented actress."[211]

84.   Taken together, the increase in negative tabloid articles about Ms. Lively, along with the comments on the articles, reflect and further spread the negative associations with Ms. Lively stemming from the identified campaign topics.

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[205]   https://www.worldofreel.com/blog/2024/8/8/it-ends-with-us-director-fought-with-blake-lively-over-final-cut.
[206]   https://www.dailymail.co.uk/reader-comments/p/comment/link/3800924869.
[207]   https://www.dailymail.co.uk/reader-comments/p/comment/link/3803653917.
[208]   https://www.dailymail.co.uk/reader-comments/p/comment/link/3855594039.
[209]   https://www.dailymail.co.uk/reader-comments/p/comment/link/3854375631.
[210]   https://www.dailymail.co.uk/reader-comments/p/comment/link/3746481439;
         https://www.dailymail.co.uk/reader-comments/p/comment/link/3805230513;
         https://www.dailymail.co.uk/reader-comments/p/comment/link/3814440361.
[211]   https://www.dailymail.co.uk/reader-comments/p/comment/link/3802573881.

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> iii.   **Highly viewed social media posts repeat the campaign narratives in negative posts about Ms. Lively**

85.   Once initiated, the campaign narratives, and their related negative associations, spread across a range of social media platforms. To supplement Dr. Mayzlin's analysis discussed above, I also reviewed posts from August 2024 on Instagram, TikTok, and YouTube to qualitatively assess whether consumers were receptive to the campaign narratives that appeared on those platforms.

86.   On Instagram, several posts from this time period include the notion that Ms. Lively was a "mean girl" and dissected content like the "little bump" interview. For example, in a reel posted on August 17, 2024, one former reporter with over 13,000 followers said Ms. Lively had a "mean girl vibe" for the way she acted during the "little bump" interview in a post that received 540,000 views.[212] Another post from August 15, 2024, by an account typically "highlighting the work of The Prince and Princess of Wales" received 224,000 views[213] on a video post with the caption "Blimey, Blake Lively, […] It's high time people see you for the mean girl and the unkind, anti-women you've always been."[214] Other posts on Instagram critique the marketing of *It Ends With Us*, calling Ms. Lively "tone deaf,"[215] racking up thousands of views. One such video by the host of a marketing podcast[216] was viewed over 1.4 million times and alleges that Ms. Lively "destroyed four brands," in reference to her beverage and haircare brands.[217]

87.   Many TikTok posts also repeated concepts from the identified campaign topics, including criticizing Ms. Lively's "tone deaf" marketing of *It Ends With Us*. For example, one popular

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[212]   https://www.instagram.com/reel/C-yCZvlP8MV/.
[213]   https://www.instagram.com/prprinsessa/reels/.
[214]   https://www.instagram.com/reel/C-sdQazOKiK/.
[215]   See, for example, https://www.instagram.com/reel/C-qnKqHJ3Qu/,
        https://www.instagram.com/reel/DAfJcZOJVjE/, and https://www.instagram.com/reel/C_Avus8p2lk/.
[216]   https://www.instagram.com/zoeunlimited/reels/.
[217]   https://www.instagram.com/reel/DAPwTmJRTr5/.

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TikTok that received 4.5 million views accuses Ms. Lively of having the "audacity to show up to the premiere and tell your audience and have influencers promote it like it's the sequel to Barbie" and of using the film as an "opportunity to promote your hair care line."[218] Another TikTok with 1.4 million views and over 163,000 likes contrasts the marketing of *It Ends With Us* with *Pretty Women* over 30 years earlier to criticize Ms. Lively.[219] Another video with nearly 1 million views and 26,000 likes simply overlays the critique "girl this movie is about domestic violence, this is not the Barbie movie" over a short clip of Ms. Lively promoting the movie.[220] Another video discusses how her "entire feed" is about *It Ends With Us* and that "the consensus is that a lot of us are upset about in how the subject matter of this movie has been handled in the press tour," specifically calling out Ms. Lively for saying "wear your florals."[221] Many other videos similarly shared clips of Ms. Lively promoting the movie with negative messages posted on top of them or in the caption.[222]

88.   Similar videos proliferated on YouTube as well. One video by an account called The Comments Section, titled "Is This The REAL Blake Lively" received over 1.5 million views and is tagged with a "#meangirls" hashtag. The video has over 5,000 comments, many of which repeat the notion that Ms. Lively is a bully and a mean girl. One of the top comments, which received more than 1,200 likes, explains "This isn't an example of 'girl boss' energy. This is bullying, mean girl energy to make someone else feel 'less than.'"[223] Another commentor indicated their view of Ms. Lively had changed: "That was so disappointing. I see Blake in a

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[218]   https://www.tiktok.com/@lovingsingle/video/7402395689029782815.
[219]   https://www.tiktok.com/@devotedly.yours/video/7403827171648654623.
[220]   https://www.tiktok.com/@pinkponypolitics/video/7402295569705635103.
[221]   https://www.tiktok.com/@madisenbeaty/video/7403193600298732843.
[222]   See, for example, https://www.tiktok.com/@calabasaswings/video/7406468878240386336,
        https://www.tiktok.com/@itsmissloulita/video/7404104841351400736,
        https://www.tiktok.com/@sboshmafu/video/7402551540612926726.
[223]   https://www.youtube.com/watch?v=M-OZdg1jbbk&lc=Ugz68DN-QjSLLkScB8B4AaABAg.

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different light."[224] Another stated, "Nepo babies are the absolute worst. Mean girl energy? Nah,

straight up just a MEAN GIRL."[225]

89.   Another YouTube video with over 2.7 million views fictionalizes the encounter by

depicting a host mocking Ms. Lively, insinuating that she is self-centered while "doing press for

It Ends With Us."[226] Another video, with over 1.9 million views, titled "blake lively is

speedrunning the end of her career right now," begins with the simple statement, "If I had to sum

up this entire video in a word, it would be tone-deaf."[227] The video's host accuses Ms. Lively of

being tone-deaf in her promotion of It Ends With Us and trying to "profit" off of domestic

violence. There are over 6,600 comments on the video, many of which express negative

sentiment toward Ms. Lively. For example, one comment reads, "The "congrats on your little

bump" comment is such high school bully behavior it made me have war flashbacks to junior

year," receiving over 7,500 likes. Another commentor remarked: "Blake is tone deaf, blind and

mute at this point."[228] Several commentors claimed Ms. Lively wanted to have "a Barbie

moment."[229] Another comment on the video explained that her opinion of Ms. Lively had soured:

> I wasn't at all surprised by Colleen Hoover not taking the themes of her story
> seriously because she sucks as a writer and her books are full of rampant abuse
> apologia, but Blake Lively was definitely a surprise. **I barely knew anything
> about her before this, and it instantly tanked my opinion from positively
> neutral to 'wow this person sucks'.** And then everything else made it infinitely
> worse.[230]

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224   https://www.youtube.com/watch?v=M-OZdg1jbbk&lc=Ugzje7aUw1B26TSug9F4AaABAg.
225   https://www.youtube.com/watch?v=M-OZdg1jbbk&lc=Ugw9Xgd-cNyJUrewiC54AaABAg.
226   https://www.youtube.com/shorts/nzd0PVdgoiA.
227   https://www.youtube.com/watch?v=J7jyvDCTyjQ.
228   https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgyUI31ydQm_
       liFIdx94AaABAg.A7SD9nfzgZuA7SGRgT6cCg
229   See, for example. https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgwyXnicTxlv5VmvrtZ4AaABAg,
       https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgwTLutqx22Mu-OlR2h4AaABAg, and
       https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgzKVhQPkzwSXLlgQFx4AaABAg.
230   Emphasis added.
       https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgzrUGqfIlVix9hsS5l4AaABAg&pp=0gcJCSMANp

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90.   The scope of discussion tying Ms. Lively to the campaign narratives is exemplified by

the presence of a high volume of negative social media posts, many of which received comments

repeating negative associations about Ms. Lively. The sheer volume and severity of negative

posts about Ms. Lively is clear evidence that reputational harm has occurred.

iv.   Comparison of associations before and after the retaliation campaign

91.   Analyzing search terms associated with Ms. Lively can also reveal the degree to which

negative associations increased in relation to her name and brand. Google Trends enables an

analysis of what terms people associate with Ms. Lively and how those changed during the

retaliation campaign period as compared to the period immediately before the retaliation

campaign. Prior to the retaliation campaign, Google Trends data indicate that consumer searches

primarily associated Ms. Lively with various films and movies she had starred in; other

celebrities, including Taylor Swift, Hugh Jackman, and Gigi Hadid; and her husband, Ryan

Reynolds, as shown in Figure 5 below.[231]

G00pGi.

[231]   These associations are similar to those identified prior to August 2024 by Dr. Mayzlin on Reddit, X, and
YouTube. Mayzlin Report, ¶62 and Figure 7.

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Figure 5. Google Trends top and rising topics and queries associated with Blake Lively in July 2024[232]

Top Topics	Top Queries	Rising Topics	Rising Queries
Ryan Reynolds	blake	Post-credits scene	olin
Deadpool	blake lively	Premiere	blake lively olin
Deadpool & Wolverine	ryan reynolds blake lively	X-Men	was blake lively in deadpool
Deadpool	blake reynolds	Credit	blake lively and gigi hadid
Taylor Swift	ryan reynolds	Olin Reynolds	blake lively ladypool
Hugh Jackman	deadpool	Emma Corrin	cast of deadpool 3 blake lively
It Ends with Us	deadpool blake lively	Closing credits	girl deadpool
Lady Deadpool	blake and ryan	Catsuit	olin reynolds
Gossip Girl (2007)	blake lively movie	Olin Corporation	who played lady deadpool
Gigi Hadid	ryan reynolds and blake lively	Olin Corporation	gambit
Deadpool	blake lively kids	Wesley Snipes	blake lively deadpool premiere
Scarlett Johansson	blake lively movies	Dogpool	olin name
It Ends with Us	wolverine	Blade	who plays lady deadpool
Green Lantern	lady deadpool	Gambit	blake livly
Wolverine	blake lively lady deadpool	Gigi Hadid	blake lively gigi hadid deadpool wolverine

92.   In contrast, as shown in Figure 6 below, the top and rising topics and associations on Google Trends in the month of August 2024 show many terms emerging from the campaign narratives. The overwhelmingly negative nature of the fastest growing queries indicates that people were likely seeking out content that was the target of the retaliation campaign. For

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[232]   https://trends.google.com/trends/explore?date=2024-07-01%202024-07-31&geo=US&q=%2Fm%2F06_bq1&hl=en.

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example, Google lists negative associations such as "bitch," which increased by 1,850% in

search interest over the prior period, and "plantation," which increased by 1,300% increase, as

rising terms associated with searches for Ms. Lively during the campaign period. Other rising

topics and queries are associated with the "little bump" interview, such as Parker Posey and

Kjersti Flaa. Among the related queries that saw the greatest increase in the same time period are

"parker posey blake lively,"[233] "blake lively rude," and "blake lively backlash."[234]

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[233] This query is related to Ms. Lively's "little bump" interview, which featured Ms. Lively and Ms. Posey being interviewed by Ms. Flaa. Separate Google Trends searches for Parker Posey and Kjersti Flaa reveal August 2024 as by far the highest concentration of searches for either, by a difference of 40 and 93 percentage points, respectively. See, https://trends.google.com/trends/explore?date=all&q=parker%20posey&hl=en; https://trends.google.com/trends/explore?date=all&q=kjersti%20flaa&hl=en.
[234] https://trends.google.com/trends/explore?date=2024-08-06%202024-08-23&q=blake%20lively&hl=en.

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Figure 6. Google Trends top and rising topics associated with Blake Lively in August 2024, following the retaliation campaign[235]

Top Topics	Top Queries	Rising Topics	Rising Queries
It Ends with Us	blake lively	Parker Posey	justin baldoni and blake lively drama
Ryan Reynolds	blake	Kjersti Flaa	parker posey
Justin Baldoni	blake reynolds	Drama	parker posey blake lively
Interview	ryan reynolds	Drama	blake lively it ends with us drama
It Ends with Us	blake lively ryan reynolds	Interview	blake lively it ends with us interview
Deadpool & Wolverine	it ends with us	Feud	kjersti flaa
Drama	it ends with us blake lively	Nepo baby	blake lively backlash
Deadpool	blake lively movie	Controversy	blake lively britney spears dress
Gossip Girl (2007)	deadpool	Justin Baldoni	blake lively justin baldoni feud
Taylor Swift	blake lively deadpool	Bitch	kjersti flaa blake lively interview
Deadpool	blake lively movies	Cafe Society	blake lively nepo baby
Deadpool	blake lively interview	Hair care	blake lively drama
Scarlett Johansson	justin baldoni	Plantation	blake lively and justin baldoni feud
Leighton Meester	justin baldoni blake lively	Domestic violence	blake lively justin baldoni drama
Hugh Jackman	blake lively drama	Hairstyling product	blake brown hair care

93.   In some cases, consumer discussion of Ms. Lively in conjunction with these negative

topics was so prevalent that Ms. Lively became associated with the negative search term itself,

even absent mention of her explicitly. For instance, a search for "tone deaf" reveals Ms. Lively is

ranked as 4th most popular related topic,[236] and "bully" which shows the query "blake lively

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[235]   https://trends.google.com/trends/explore?date=2024-08-01%202024-08-31&q=%2Fm%2F06_bq1&hl=en.
[236]   https://trends.google.com/trends/explore?date=2024-08-06%202024-08-23&q=tone%20deaf. Neither Ms.
Lively nor Mr. Reynolds appear in the related topics or queries in the period preceding the retaliation

bully" is the 7th ranking rising related query.[237] The rapid increase in online searches for Ms. Lively in conjunction with the narratives amplified by the alleged campaign indicates a rise in negative associations with Ms. Lively in the public sphere.

94.   In sum, the negative associations identified in the retaliation campaign were widely disseminated in discussions of Ms. Lively on social media, thereby becoming widely discussed and circulated in the public sphere. Moreover, as discussed above, these associations were shared among a large, receptive audience through both social networks and in tabloid media, which further amplified the impact of the negative coverage, resulting in harm to her person brand and reputation.

E. Negative associations that were introduced during the initial campaign period persisted following the filing of Ms. Lively's lawsuit

95.   Since the filing of her initial Complaint on December 20, 2024, Ms. Lively has been the subject of widespread media coverage and online consumer discussion. The negative associations that were introduced and/or strengthened in the period prior to the filing of Ms. Lively's Complaint persisted in the period that followed, including through social media influencers that worked in coordination with the Defendants to push negative messages about Ms. Lively.

i.   The Defendants coordinated to place social media posts perpetuating the negative associations with Ms. Lively in January 2025

96.   Evidence indicates that social media posts from influencers that were negative toward Ms. Lively were coordinated by the Defendants following Ms. Lively's lawsuit. For example,

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[237]   campaign. See, https://trends.google.com/trends/explore?date=2024-07-01%202024-08-05&q=tone%20deaf. https://trends.google.com/trends/explore?date=2024-08-01%202024-08-31&q=bully&hl=en. Ms. Lively does not appear among the related queries or topics in the preceding month. See, https://trends.google.com/trends/explore?date=2024-07-01%202024-07-31&q=bully&hl=en.

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text messages reveal that the influencer and journalist Sage Steele developed a video in conjunction with the Defendants Steve Sarowitz, Jamey Heath, Jennifer Abel, Justin Baldoni, and Melissa Nathan, among others, including Mr. Baldoni's attorney, Mr. Freedman.[238] In the text messages, dated January 3, 2025, Mr. Freedman notes that "Sage is on copy" and that "[i]n order to use her, we need to start with a video that can go viral. That will get her in organically."[239] The group then had a "brainstorm" about what points Ms. Steele should make in her video to discredit Ms. Lively.[240]

97.   Another set of text messages, three days later, kick off with Ms. Steele sending a video to the group, soliciting feedback on the content of the video, and resending a new version.[241] Suggestions include the idea that "BL totally comfortable destroying the lives of women who don't have bodyguards and gated estates" and discussing the "little bump" interviewer.[242] Mr. Freedman adds:

> I also think you should say at some point that your [sic] interested in this not because your lawyer is involved in the case but because when you started to do the research and saw what the stories were saying that the disconnect and irresponsible and plainly inaccurate reporting was shocking. That it reminded you of Duke Lacrosse where there was a rush to judgement that destroyed people's lives even to this day. And add in some similar situations. Whatever happened to 'let's get all the facts' Baldoini's team is willing to put all the texts out. They seem to have nothing to hide. Let's start there.[243]

98.   Ms. Steele ultimately published a video on January 7, 2025 across a range of social media

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[238]   SAROWITZ_000001020.
[239]   SAROWITZ_000001020.
[240]   SAROWITZ_000001020.
[241]   SAROWITZ_000001253.
[242]   SAROWITZ_000001253.
[243]   SAROWITZ_000001253.

platforms, including YouTube,[244] Instagram,[245] TikTok,[246] X,[247] and Facebook.[248] She also made

audio of the video available on Podcast platforms.[249] In this video, Ms. Steele critiques Ms.

Lively and the New York Times and makes many of the points that were included in her

discussion with the defendants, including referencing her supposed personal interest in the

conflict between Ms. Lively and Mr. Baldoni, citing her relationship with Mr. Freedman, talking

about the "little bump" interviewer, and discussing the text messages released by Mr. Baldoni

and his team. She also states that she "thinks Blake is abusing her power," which is "so

disappointing because it ends up hurting other women."[250]

99.   This video was popular. It received over 200,000 views and 1,100 comments on

YouTube,[251] over 330,000 views on Instagram,[252] and over 1.5 million views on TikTok.[253]

ii.   The broader public reaction on social media continued to perpetuate the campaign narratives and negativity toward Ms. Lively

100.   The impact of the retaliation campaign on Ms. Lively's reputation can also be seen on

other social media platforms such as TikTok, where popular posts continued to reinforce the

negative associations that were introduced in August 2024. One post captioned "sorry but Blake

Lively has always given mean girl vibes…" features a 3-minute compilation of interviews from

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[244]   https://www.youtube.com/watch?v=2gMTYXxsNwg.
[245]   https://www.instagram.com/reel/DEiZu-9xGMB/?hl=en.
[246]   https://www.tiktok.com/@officialsagesteele/video/7457284296856866091.
[247]   https://x.com/sagesteele/status/1876752992164044966?lang=en.
[248]   https://www.facebook.com/17841401462773682/videos/917775630132577/.
[249]   See, for example, https://open.spotify.com/episode/1HvHMVCkWxm9JIpPHZPfFC, https://podcasts.apple.com/gt/podcast/shame-on-blake-lively-the-new-york-times/id1754460914?i=1000683220818, and https://www.audible.com/podcast/Shame-on-Blake-Lively-The-New-York-Times/B0DSJX5SLP?srsltid=AfmBOop45gTTiLvFh_w-8r5fOTKTDsXLyBjSQUawJx0p_b720J3FId98.
[250]   https://www.youtube.com/watch?v=2gMTYXxsNwg.
[251]   https://www.youtube.com/watch?v=2gMTYXxsNwg.
[252]   https://www.instagram.com/sagesteele/reels/.
[253]   https://www.tiktok.com/@officialsagesteele. A full account of the impressions generated by Ms. Steele's posts can be found in Appendix D.

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throughout Ms. Lively's career intended to show her in a negative light and received 12.1 million views.[254] One commenter wrote "Blake Lively is an awful human being! A straight up Mean Girl who thinks she's better & smarter than everyone else… but she's NOT!"[255] Another comment on the same video stated "Ultimate mean girl," garnering 22,100 likes.[256] Many other users commented on Ms. Lively being a "mean girl", for example, "wow I never realized she was such a mean girl"[257] and "Okay who let the mean girl in? That's supposed to stop after high school at the latest."[258] Other commentors called Ms. Lively a bully: "Blake bullied Princess Kate during her cancer treatments 😡😡 I'll never watch Blake again"[259] and "She's a straight up bully 😳".[260] Referencing one of the interviews included in the video, another commenter wrote "The cookie one is especially sad bc the interviewer was trying super hard to be professional and she was being so rude," receiving 17,000 likes.[261]

101.   Another video, captioned "The Downfall of Blake Lively and Ryan Reynolds" covered the release of new evidence in the case and received 7.4 million views and nearly 15,000 comments.[262] Several commentors on the post repeated the ideas that Ms. Lively is a bully, receiving tens of thousands of likes:

- "It sounds like she's used to intimidating people and she finally met someone who won't back down," (58,000 likes).[263]

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[254]   https://www.tiktok.com/@pop.diaries/video/7456540313121721630.
[255]   https://www.tiktok.com/@pop.diaries/video/7456540313121721630?
          cid=NzQ1ODczNTI3MzU2MTk4MTc0Mg.
[256]   www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1NzYxMDE1Mzk3MTEzOTM1OQ
[257]   www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1ODY4NTMyNTI2NDUzNjM1MQ
[258]   https://www.tiktok.com/@pop.diaries/video/7456540313121721630?
          cid=NzQ1ODUyOTY2MDM5NDMyNDc3OQ.
[259]   https://www.tiktok.com/@pop.diaries/video/7456540313121721630?
          cid=NzQ1ODQwMjMyMjYxNzk3NTU5NA.
[260]   https://www.tiktok.com/@pop.diaries/video/7456540313121721630?
          cid=NzQ1ODQ3OTE4MjYxNzg3MTE1MA.
[261]   www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1NzU4NTI0MTYzNzk3ODkxMA.
[262]   https://www.tiktok.com/@bee.better.company/video/7462611161788239110.
[263]   www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=

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- "Her EGO will destroy her .. and then she will blame everyone else," (44,000 likes).[264]

- "It makes me mad as a woman. False accusations make us all lose credit," (21,000 likes).[265]

102.   Other commenters asserted that TikTok as a platform had turned against Ms. Lively, one

writing that "Blake is screaming crying throwing up that TikTok did not go away" receiving

24,800 likes,[266] another that "Blake hates TikTok so bad right now," receiving 52,900 likes.[267]

The account posting these videos, bee.better.company, is a popular influencer account on TikTok

with over 1.6 million followers.[268]

103.   Other popular TikTok, YouTube, and Instagram influencer accounts also posted content

related to the themes of retaliation campaign about Ms. Lively, including withoutacrystalball,

who has over 160,000 followers on Instagram[269] and PopcornedPlanet, who has over 946,000

subscribers on YouTube.[270] Both of these accounts have a significant volume of posts about Ms.

Lively and the promotion of and other news around *It Ends With Us*, often casting Ms. Lively in

a negative light.[271] As with bee.better.company's account, comments on their posts also repeat

the idea that Ms. Lively is a mean girl and a bully. For example, one comment on a January 2025

post by withoutacrystalball ends with the note, "She seems like a mean girl/bully that thinks

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NzQ2MjYxNTMzMTQzOTAxODc4Mw.
[264]   www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=
NzQ2MjYyOTk5MTAxNDI2OTcwMg.
[265]   www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=
NzQ2MzIwNDQ2NzE1OTA4OTk2Ng.
[266]   www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=
NzQ2Mjc0ODkyNDYzOTY5MTU2Mg.
[267]   www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=
NzQ2MjYxODE1NjY2ODA2MDQ0Ng.
[268]   https://www.tiktok.com/@bee.better.company.
[269]   https://www.instagram.com/withoutacrystalball. As of October 8, 2025.
[270]   https://www.youtube.com/popcornedplanet. As of October 8, 2025.
[271]   See, for example, https://www.youtube.com/@PopcornedPlanet/search?query=blake%20lively,
https://www.instagram.com/p/DFlhDhYv4SY/, https://www.instagram.com/p/DFRjWrLx7iN/?hl=en,
https://www.instagram.com/p/DGBF_YQRUQ-/?hl=en, and
https://www.instagram.com/p/DGDye4Nxw62/?hl=en&img_index=1.

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she's better than everyone else."[272] Similarly, a comment on a January 2025 video by

PopcornedPlanet explained, "Blake is a mean girl that weaponizes incompetence and then plays

victim. SHe is not that complicated."[273]

104.   Additionally, popular accounts from public figures also echo the narratives of the

retaliation campaign to millions of followers. Mainstream influencers such as Megyn Kelly,

Perez Hilton, and Candace Owens have all posted content to their followers across platforms and

media types disparaging Ms. Lively, as detailed in the following section.

iii.   The associations of the retaliation campaign continued after the filing of Ms. Lively's lawsuit

105.   The negative associations that were amplified by the retaliation campaign continued to

frame discussion as new information circulated after the filing of Ms. Lively's lawsuit. The

lasting impact of the retaliation campaign is evident on Reddit, for example. After the filing of

Ms. Lively's lawsuit, new subreddits favorable to Mr. Baldoni were created and these continued

to recirculate and discuss negative associations. For example, the subreddit r/TeamJustinBaldoni

was created on January 14, 2025, and currently has over 14,000 subscribers.[274] Although the

stated goal of the group is to support Mr. Baldoni, many of the top posts on the subreddit are

negative posts about Ms. Lively rather than being about Mr. Baldoni. For example, one top post

with over 675 upvotes and 75 comments is the full text of an article titled "Your Free Speech is

Under Attack by Ryan Reynolds and Blake Lively."[275] Other popular posts repeat the narratives

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[272]   https://www.instagram.com/p/DFt0dZyxbQ1/c/17953903679778336/.
[273]   https://www.youtube.com/watch?v=VLFu-QK7z2k&lc=UgxPD7QCS-LLxcp-pX54AaABAg.
[274]   https://www.reddit.com/r/teamjustinbaldoni/.
[275]   https://www.reddit.com/r/teamjustinbaldoni/comments/1mm074w/your_free_speech_is_under_attack_by_ryan_reynolds/.

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that Ms. Lively is a bully[276] and a "mean girl."[277]

106.   Another subreddit called r/ItEndsWithLawsuits was created on January 23, 2025, and

currently has over 26,000 members.[278] The subreddit focuses on the lawsuit, describing itself as

"For people that can't look away from the train wreck that is It Ends With Us." Several top posts

feature TikTok videos that are similar to those outlined above, and many posts include the same

negative narratives about Ms. Lively, as shown in Figure 7 below.

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[276]   See, for example,
https://www.reddit.com/r/teamjustinbaldoni/comments/1mxrd91/blake_lively_is_the_bully_isnt_it_ironic_says_tter/.
[277]   See, for example, https://www.reddit.com/r/teamjustinbaldoni/comments/1mdm4ge/humiliated_blake_lively_refuses_to_accept_real/.
[278]   https://www.reddit.com/r/ItEndsWithLawsuits/.

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Figure 7. Top posts in the r/itendswithlawsuits subreddit are negative toward Ms. Lively[279]

u/Best_Wash_1022 · 9 hr. ago

Lively admits to only 'privately reporting her concerns', which is arguably NOT a protected activity

As the Court summarized in its July 16, 2025 Opinion, in early August 2025, as the Film'sAugust 6, 2024 New York premiere neared, Mr. Baldoni and Mr. Heath grew concerned that their misconduct would become public, and—in a blatant act of retaliation against Ms. Lively for privately reporting her concerns about that misconduct—engaged in a coordinated campaign to "destroy" her reputation Ummm privately reporting her concerns???

https://storage.courtlistener.com/recap/gov.uscourts.nysd.634304/gov.uscourts.nysd.634304.715.0.pdf

🎩 ⚖️ Court Filings + Docket Updates ⚖️ 🎩

⬆ 58 ⬇   💬 145   🔔   ↪ Share

u/Amazing_Pace_9305 · 13 days ago

I believe if anyone was SH'd, it was Baldoni.

In my view, no one was harassed, but if anyone could make that claim, it might be Baldoni. Here's why: Her texts were highly flirtatious and unprofessional, including comments about "ball-busting" (not with teeth), suppositories, etc. She declined to meet with the intimacy coordinator, who is there to protect both actors, not just her, leaving him to handle that alone. She invited him in while she was pumping, which she herself describes as intimate. She made personal comments about his appearance and nose. She arranged situations where they were alone together in the editing bay. Again, I'm not saying harassment occurred, b...

Personal Opinions & Theories ⚠️ 💡

⬆ 702 ⬇   💬 253   🏅 1   ↪ Share

u/Decent_Pack_3064 · 20 hr. ago

What a year makes – no birthday bash from Blake's former bestie

If anyone's still wondering how badly Blake Lively's friendship with Taylor Swift has fallen apart, look n further than this tmz article:
https://www.tmz.com/2024/08/25/taylor-swift-travis-kelce-blake-lively-birthday-beach-house/ Last year, Taylor and Travis Kelce hosted Blake's birthday at Taylor's private Rhode Island mansion. Jason Kelce was there. Bradley Cooper. Even Patrick Mahomes and Brittany. Note, Patrick Mahomes is the NFL golden boy. This year? Blake's throwing a "quiet private gathering." Translation: No Taylor. No Kelces. No Mahomes. Jus...

🎤 Press + Media 📰🎬📺

⬆ 202 ⬇   💬 67   🔔   ↪ Share

u/Totallytexas · 6 days ago

Blake Lively roasted after landing starring role in new rom-com: 'Good luck to the director'

🎤 Press + Media 📰🎬📺

https://pagesix.com/2025/08/21/entertainment/blake-lively-roasted-over-new-ro...

⬆ 449 ⬇   💬 160   🔔   ↪ Share

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[279]   https://www.reddit.com/r/ItEndsWithLawsuits/, captured August 28, 2025.

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107.   Other posts repeat the campaign narratives, including calling Ms. Lively a "mean girl"[280] and a "bully."[281] Again, the popularity of forums such as these is indicative of the persistence of the negative associations and reputational harm toward Ms. Lively initially formed during the August 2024 time period. The persistence of negative associations, particularly "mean girl" and "bully" is also evident from the volume analysis in Dr. Mayzlin's report. Dr. Mayzlin found that the prevalence of each of these terms in online conversations about Ms. Lively remained elevated through the end of her analysis in February 2025.[282]

108.   The harm to Ms. Lively's reputation among the general public is also evident in public polling. YouGov[283] conducted a nationally representative poll to measure familiarity with and attitudes about Ms. Lively.[284] The poll found a 30% increase in negative attitudes toward her between June and September 2024.[285] The increase in the percentage of those who dislike her (indicated in by the blue striped bars in Figure 8 below) remained constant through the end of 2024.[286] Consumer attitudes toward Ms. Lively grew even more negative in 2025. The percentage of people who were familiar with Ms. Lively and reported "disliking" her nearly

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[280]   See, for example,
https://www.reddit.com/r/ItEndsWithLawsuits/comments/1ksu678/hollywood_hairstylist_justin_anderson_and_kristen/.
[281]   See, for example,
https://www.reddit.com/r/ItEndsWithLawsuits/comments/1klvijt/imo_a_number_of_blake_supporters_rally_around_her/.
[282]   Mayzlin Report, ¶57, Figure 4, Figure 5.
[283]   YouGov is an online research and data analytics company with more than 29 million registered panel members. YouGov has been recognized as a leader in the market research industry. https://today.yougov.com/about.
[284]   Attitude was measured with the options Really like, Like, Don't like or Really don't like, and familiarity was measured by asking respondents if they had ever heard of Ms. Lively. https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-blake-lively. I calculated the percent of dislikes as the number of people who had a negative opinion of Ms. Lively (don't like + really don't like) over the number of people who had heard of her.
[285]   https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-blake-lively. I have adjusted the YouGov figures to consider the share of negative sentiment as a percentage of respondents who indicated they were familiar with Ms. Lively. The YouGov website presents negative sentiment as a percentage of all respondents.
[286]   https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-blake-lively.

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doubled from 8.2% to 16.2% between the end of 2024 and the polling period of April to June 2025, as shown by the red bars in the figure.[287]

Figure 8. Share of respondents who are familiar with Ms. Lively and view her negatively[288]
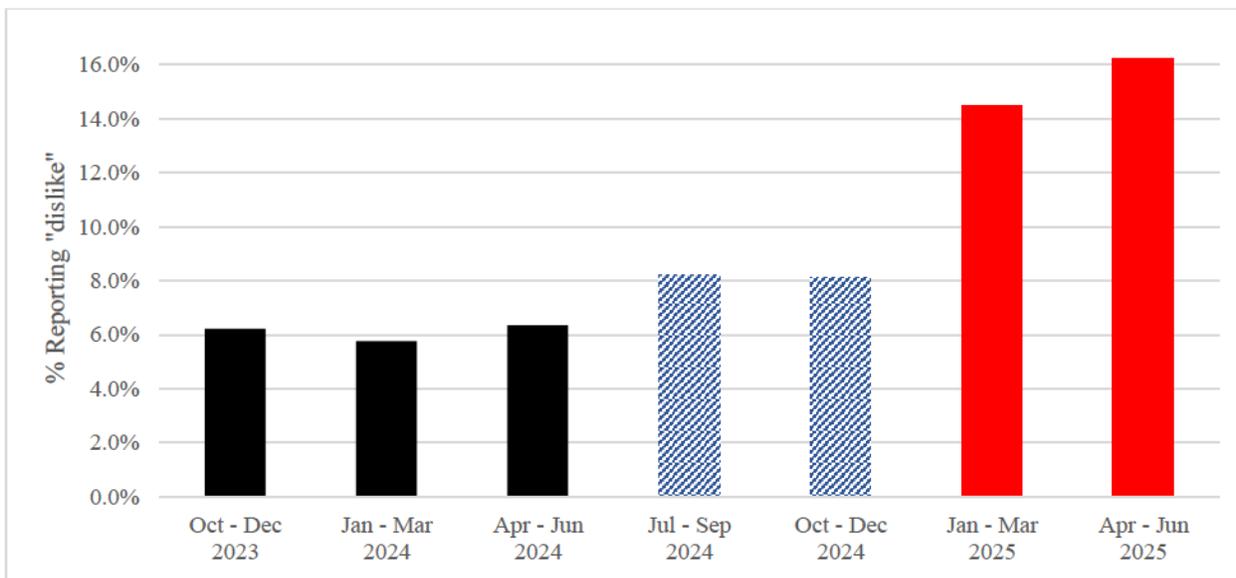
109.   This pattern of change indicates that negative sentiment toward Ms. Lively that was seeded during the onset of the retaliation campaign in August grew even more severe following the filing of Ms. Lively's lawsuit (and, as discussed in detail below, the publication of the At-Issue Statements about Ms. Lively).

VII. HARM TO MS. LIVELY'S REPUTATION HAS PERSONAL AND PROFESSIONAL CONSEQUENCES

110.   I understand that the harm to Ms. Lively's reputation due to the retaliation campaign has already impacted her both professionally and personally. As discussed in this section, I also expect that the fallout from the reputational harm Ms. Lively has suffered will continue to unfold over time. Reputation represents a key component of a person brand's value. When the general

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287   https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-blake-lively.
288   https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-blake-lively.

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public views a person brand as likable, trustworthy, and positive, that perception becomes a form of symbolic capital that can be leveraged for professional opportunities.[289]

111.   Audiences who feel positively toward the person brand are more likely to support her projects, recommend her to others, and remain engaged with her career over time.[290] In Ms. Lively's case, consumer goodwill serves to amplify her personal and professional marketability. In this way, the public's perception of a person brand directly impacts the social, cultural, and symbolic capital that drives career opportunities.[291]

112.   The reputation of a person brand in the entertainment industry can shape almost every aspect of an individual's professional career because it directly affects how casting directors, studios, audiences, and collaborators perceive the person. Like in other workplace settings, directors and producers want actors with reputations for being professional and easy to work with on set. A reputation for being a "bully" who "took control of the movie" is likely to be negatively viewed by potential employers and partners. High profile examples of person brands who are "difficult" set a cultural template for how the public understands and responds to these archetypes.

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[289]   Brooks, Gillian, Jenna Drenten, and Mikolaj Jan Piskorski (2021), "Influencer Celebrification: How Social Media Influencers Acquire Celebrity Capital," *Journal of Advertising*, 50 (5), 528-47.

[290]   McCracken, G. (1986). "Culture and consumption: A theoretical account of the structure and movement of the cultural meaning of consumer goods." *Journal of Consumer Research*, 13(1), 71–84; Fournier, S., & Eckhardt, G. M. (2019). "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619; Parmentier, Marie-Agnès and Eileen Fischer (2021), "Working It: Managing Professional Brands in Prestigious Posts," *Journal of Marketing*, 85 (2), 110-28; Parmentier, Marie-Agnès, and Eileen Fischer (2012), "How athletes build their brands," *International Journal of Sport Management and Marketing*, 11(1-2), 106-24; Thomson, M. (2006). "Human Brands: Investigating Antecedents to Consumers' Strong Attachments to Celebrities." *Journal of Marketing*, 70(3), 104–119.

[291]   See also Parmentier, Marie-Agnès, Eileen Fischer, and A Rebecca Reuber (2013). "Positioning Person Brands in Established Organizational Fields," *Journal of the Academy of Marketing Science*, 41 (3), 373-87; Parmentier, Marie-Agnès and Eileen Fischer (2021), "Working It: Managing Professional Brands in Prestigious Posts," *Journal of Marketing*, 85 (2), 110-28; Fournier, S., & Eckhardt, G. M. (2019). "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619.

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113.   Actors and actresses in leading roles on movies and TV shows often play an integral role

in promoting and marketing those projects. The widespread conversation about Ms. Lively's

allegedly tone deaf marketing of *It Ends With Us* is harmful to her reputation in that it may give

movie studios concern about her ability to appropriately serve as the marketing spokesperson for

future movie projects. Further, the scale of the negative reputation campaign may cause movie

studios to fear that Ms. Lively is a "risky" choice, which may cause them to avoid hiring her for

fear of future public controversies overshadowing the work or otherwise alienating viewers.

114.   Beyond acting opportunities, Ms. Lively's reputation also potentially impacts her ability

to pursue other business endeavors. Person brands often leverage their popularity and visibility in

the public sphere to take on brand endorsements and/or develop and market their own branded

products.[292] For example, Jennifer Garner and Samuel L. Jackson have been longstanding

spokespersons for Capital One, appearing in several ad campaigns for the bank's credit card

brand over the past decade.[293] Other person brands have launched their own brands, bringing in

millions of dollars in revenue, such as Jessica Alba's Honest Company;[294] Reese Witherspoon's

book club and production company, Hello Sunshine;[295] and George Clooney's Casamigos tequila

brand.[296] These brands have been successful, in part, due to the endorsement value of the

celebrity's reputation, allowing the celebrity themselves to serve as trusted and appealing

spokespersons for the brand.[297] As discussed in Section V, the value of celebrity endorsers lies in

their positive associations in the public sphere, embodied in their reputation and ability to appeal

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[292]   Israeli, Ayelet, Jill Avery, and Leonard A. Schlesinger (2024). "The Meteoric Rise of Skims." Harvard Business School, 524-067.
[293]   https://www.ispot.tv/brands/7PE/capital-one-banking.
[294]   https://variety.com/2024/biz/news/jessica-alba-steps-down-the-honest-company-1235965784/.
[295]   https://time.com/collection/time100-companies/5953581/hello-sunshine/.
[296]   https://www.casamigos.com/en-us/our-story.
[297]   https://hbr.org/2024/05/what-makes-a-successful-celebrity-brand.

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to a wide audience—the symbolic capital embodied in their person brand. When these symbolic assets are diminished, their professional opportunities become more limited, and their endorsement becomes worth less.

115.   I understand that Ms. Lively has also suffered a range of personal consequences related to the wave of negative online attention she received in August 2024, including both physical and emotional suffering.[298] Ms. Lively testified that she experienced "digital harassment" from what she viewed as a social media plan to harm her reputation.[299] Further, she felt that she alone was held responsible for the marketing of the film, explaining it "was very odd, because an actor doesn't normally hold the responsibility of the entire marketing of a film."[300]

116.   Ms. Lively went on to testify it felt like her "character was being assassinated." She explained, suddenly "I was a mean girl, that I was a bully […] my character was being attacked," and that "any context-free negative moment from [her] past" was "dredged up."[301] Ms. Lively explained these character attacks and the negative social campaign led to the physical and emotional suffering she experienced, also impacted her family's emotional well-being, including that of her husband, children, mother, and siblings.[302]

117.   In addition, Mr. Reynolds also has a successful movie career and several highly successful branded product lines, including consumer products like Aviation Gin[303] and Mint Mobile,[304] the soccer club Wrexham,[305] and a production company Maximum Effort.[306] He is

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[298]   Deposition of Blake Lively, 261:22-262:4.
[299]   Deposition of Blake Lively, 137:7-13, 137:23-138:1.
[300]   Deposition of Blake Lively, 252-53:13-3.
[301]   Deposition of Blake Lively, 202:3-14.
[302]   Deposition of Blake Lively, 220:4-20.
[303]   https://fortune.com/2018/08/10/ryan-reynolds-aviation-gin-owner/.
[304]   https://qz.com/t-mobile-acquires-mint-mobile-ryan-reynolds-roaming-1851449754.
[305]   https://www.espn.com/soccer/story/_/id/44940499/how-ryan-reynolds-co-bought-wrexhams-path-promotion.
[306]   https://www.hollywoodreporter.com/business/business-news/maximum-effort-marketing-ryan-reynolds-george-dewey-mntn-deal-1236155837/.

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often used as an example of a successful and accomplished celebrity businessman.[307]

Reputational harm to Ms. Lively could have spillover effects to her husband, although I do not

focus on harm to Mr. Reynolds' reputation for purposes of this report.

118.   The nature of the Wayfarer Parties' "untraceable" campaign affects my ability to measure

and trace the full spread of social and traditional media narratives that are damaging to Ms.

Lively and attributable to the retaliation campaign. Additionally, I do not have access to recently

received deposition testimony in this case, some of which I understand was completed

approximately one week prior to my report submission, and I also understand that document

production for materials that may have been relevant to my analysis have been produced as

recently as October 10. For these reasons, I reserve the right to supplement this report to

supplement and address quantifiable reputational harm as additional information comes to light.

119.   In sum, the retaliation campaign promoted specific, identifiable frames associated with

Ms. Lively, and these became widely circulated during and after the period of the campaign.

They became the lens through which the general public integrated new information and had a

lasting negative impact on Ms. Lively's reputation. They further provided a receptive audience

for future, congruent claims about Ms. Lively, which I examine in the next section.

PART 2 – DEFAMATORY STATEMENTS

120.   In this part of my report, I analyze the impact the At-Issue Statements made by Mr.

Freedman had on Ms. Lively's reputation. Specifically, I assess the number of impressions of the

At-Issue Statements ("Impressions Model"), the public response to the statements and their

likely impact on Ms. Lively's reputation ("Impact Assessment") and the cost to repair Ms.

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[307]   See, for example, https://macleans.ca/society/the-power-list-ryan-reynolds/ and https://hbr.org/2024/05/what-makes-a-successful-celebrity-brand.

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Lively's reputation based on the harm caused by the At-Issue Statements ("Damages Model").

VIII. THE AT-ISSUE STATEMENTS

121.   I understand that Ms. Lively alleges that certain remarks made by Mr. Freedman following the filing of her lawsuit were defamatory.[308] The At-Issue Statements assert that, among other things, Ms. Lively made false accusations against Mr. Baldoni, Wayfarer Studios, and its representatives, and that she pushed a self-serving agenda in her accusations to take control of the film.[309] They also explicitly state that Ms. Lively's allegations of sexual harassment are false and that, in actuality, no sexual harassment occurred (collectively, the "defamatory claims").[310] Additionally, I understand that Mr. Freedman has continued to make public statements about Ms. Lively following the filing of this lawsuit, which repeat similar themes about Ms. Lively making false accusations and being a "bully."[311]

122.   The At-Issue Statements were made directly to reporters and press outlets, specifically (1) a December 21, 2024 statement to the New York Times; (2) a January 7, 2025 interview with Megyn Kelly; (3) two January 18, 2025 statements to *Deadline*; and (4) a January 25, 2025 statement to *Page Six*.[312]

IX. IMPRESSIONS MODEL

A. Calculating impressions

123.   To calculate the impressions of the At-Issue Statements, I gathered and summed the

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[308]   *Lively v. Wayfarer, et al.*, Second Amended Complaint, ¶ 450.
[309]   Second Amended Complaint, ¶ 451.
[310]   As with the defamatory statements, this phrase should be understood to mean "allegedly-defamatory" and I am basing my opinion on the assumption that these claims are defamatory.
[311]   *Lively v. Wayfarer, et al.*, 24-cv-10049 (S.D.N.Y.), Dkt. 546–47 (reflecting statements regarding Ms. Lively). While I understand that counsel has filed a motion for sanctions in connection with these statements, my analysis does not rely on the ultimate disposition of the motion, and is instead based on the substance of the statements made.
[312]   See Appendix F.

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impressions for each instance in which some or all of the At-Issue Statement appeared.[313] These instances included: (1) the originating source, and (2) the dissemination of the at-issue statement on (a) social media, such as TikTok and X, (b) online websites and/or articles, and (c) traditional media like television.

124.   Scholarship on media viewership has provided two ways to measure audiences: as people and as impressions. Old, or traditional, media, such as television, tends to be measured in reach, or people.[314] New media like social and digital media tend to be measured in impressions.[315] When measuring impressions, one individual may receive multiple impressions across different types of media.[316] That is, some people may receive multiple exposures to a statement while others may receive only one exposure. I assume that for traditional media, one viewer represents one impression.

125.   To model the total number of impressions in social and digital media, one calculates and adds the number of impressions that occur at each level in the network.[317] Thus, I measure the impressions of each source as follows:

- *Originating source*. In this case, the At-Issue Statements, detailed in Appendix F, originated from a December 21, 2024 statement to the New York Times, a January 7, 2025 interview with Megyn Kelly, two January 18, 2025 statements to *Deadline* and a January 25, 2025 statement to *Page Six*. Impressions are measured in accordance with the source of the initial publication.

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[313]   Specifically, I included in my analysis any instance in which either (1) the full At-Issue Statement was reproduced, or (2) a portion of an At-Issue Statement that included the defamatory claims (i.e., that Ms. Lively lied, made false accusations, or pushed a self-serving agenda). See, Appendix F.

[314]   Gensch, Dennis and Paul Shaman (1980), "Models of Competitive Television Ratings," *Journal of Marketing Research*, 17 (3), 307-15, Picard, Robert G (1988), "Measures of Concentration in the Daily Newspaper Industry," *Journal of Media Economics*, 1 (1), 61-74.

[315]   https://theraveagency.com/blog/finding-the-value-in-twitter-impressions.

[316]   https://sproutsocial.com/insights/reach-vs-impressions/.

[317]   Vosoughi, S., Roy, D., and Aral, S. (2018), "The spread of true and false news online," *Science*, 359: 1146-1151.

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- *Social media.* Social media impressions are measured based on the reported or estimated number of views from each platform.

- *Online news impressions.* Online news viewership is measured by the estimated number of visits to the article.

- *Television impressions.* Television impressions are measured by the ratings of the program the statement appeared in.

- *Total impressions.* Total impressions are calculated as the sum of impressions across the above mentioned platforms for which there exists reliable data.

126.   The Impressions Model details the number of times the At-Issue Statements were seen. I include in my calculation partial republications of the At-Issue Statements if the portion of the statement included a clear reproduction of one or more of the defamatory claims.

B. Online news

127.   To estimate the number of online news impressions, I use the views reported by the platform or use SEMRush,[318] a third-party tool used by digital marketing and advertising professionals to measure views. While website owners can directly measure their web views, non-owners can use third-party tools that provide measures of web traffic for competitors.[319] These tools collect and report data from over 200 million internet users daily and report statistics such as total visits, unique visitors, and time on the site.

128.   To determine the number of impressions of an at-issue statement that was published in an online news article, I collected:

- the number of unique monthly visitors to the part of the website on which the article was published[320]

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[318]   https://www.semrush.com/company/.
[319]   https://www.semrush.com/blog/analyzing-competitors-traffic/.
[320]   Specifically, I collect the number of unique monthly visits from the most specific subfolder available on SEMRush for each website. Subfolders are directory folders that exist within the main website organizing related content. For example, a website (website.com) might have subfolder for posts related to entertainment

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- the bounce rate (*i.e.,* the percentage of people who visit the website but leave within 10 seconds or perform no other action such as scrolling or clicking on links)[321]

- the article's position on the page on the day it was published.[322]

129.   To calculate the number of impressions of an individual article, I divide the number of unique monthly visits by 30 to get a daily estimate.[323] This step is conservative because it includes traffic for only one day. I then take that figure and multiply it by the bounce rate to remove users who visited the website but took no further action such as a click. I then summed views for each article to calculate total impressions from online news. Figure 9 below shows the equation I used to calculate web impressions for online news (3,559,144 impressions).

Figure 9. Equation 1

Web Impressions = Sum[(Unique Monthly Visitors Each Month)*(1-bounce rate) from the month of publication]/30

C. Social media

130.   To calculate social media impressions, I aggregate views across social networks that disseminated the At-Issue Statements such as X, Facebook, Instagram, TikTok, and YouTube.

131.   *Facebook.* Facebook is a social network where users can post text, photos, and videos. Facebook directly reports the number of times a video has been viewed.[324] On some videos and posts without videos, no view count is recorded; for these, I estimated impressions using the

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[321] (website.com/entertainment).
https://www.semrush.com/blog/bounce-rate/. The bounce rate for the specific subfolder used in my tally of impressions is the rate used for the calculation.
[322] I used the Internet Archive (https://web.archive.org/) to confirm that the article was at the top of the landing page of the subfolder used in my calculation on the day of the article's publication. In instances where I could not identify evidence that an article containing an at-issue statement appeared at the top of the web page, the article was excluded from my analysis.
[323] In some cases, SEMRush had traffic estimates to a particular webpage for a single day. As this is already a daily estimate, I did not divide these daily estimates by 30 when performing my calculation.
[324] On Facebook, a view is registered when a video has played for 3 seconds. See, https://www.facebook.com/business/news/Coming-Soon-Video-Metrics.

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mean observed impression rate of 2.5% from the other Facebook posts in consideration.[325]

According to these metrics, the At-Issue Statements were viewed 6,280,592 times on Facebook.

132.   *Instagram.* The At-Issue Statements were also disseminated in Instagram videos and

posts. Instagram directly reports the number of times a video has been viewed.[326] For Instagram

posts consisting of still images, which do not display view counts, I estimated impressions as 6%

of the posting account's total follower count.[327] According to these metrics, the At-Issue

Statements were viewed 10,556,868 times on Instagram.

133.   *X.* Formerly known as Twitter, X is a social media platform where users share short

posts, videos, photos and links.[328] X provides direct metrics on post views, allowing me to use

view count as a measure of impressions. On X, the At-Issue Statements were viewed 5,165,207

times.

134.   *TikTok.* TikTok, a short-form video platform operated by ByteDance Ltd.,[329] similarly

provides statistics on the number of times a video was viewed. The view count for a video is

displayed on the user's home page. On TikTok, the At-Issue Statements were viewed 41,544,100

times.

135.   *YouTube.* YouTube, an online video-sharing platform, also offers public metrics showing

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[325]   I calculated the mean views to followers ratio for the Facebook videos for which this information was available. To be conservative, I have relied on this 2.5% figure to estimate impressions, as it is lower than the reported rate for Instagram (6%) and the minimum of 5% reported for X (Wang et al 2016).

[326]   On Instagram, a view is registered when a video has played for 3 seconds. See, https://help.instagram.com/1562166204102854, accessed at https://web.archive.org/web/20240302195841/https://help.instagram.com/1562166204102854.

[327]   See, https://www.rivaliq.com/blog/instagram-stories-benchmark-report/#title-stories-reach-rate; *see also:* https://www.rivaliq.com/blog/instagram-stories-benchmark-report/#title-methodology, https://www.socialinsider.io/social-media-benchmarks/instagram. I have relied on an impressions rate of 6%, as the majority of posts included in my Impressions Model are from accounts with greater than 200,000 followers.

[328]   https://help.x.com/en/resources/new-user-faq.

[329]   https://www.ebsco.com/research-starters/computer-science/tiktok-media-app.

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how many times a video has been watched. I used these publicly available view counts as a measure of impressions for videos containing the At-Issue Statements in either the video or the caption of the video. On YouTube, these videos were viewed 4,129,619 times.

D. Television

136.   The Internet Archive's TV News Archive allows users to search the closed captioning of TV news broadcasts. To identify broadcasts that republished the At-Issue Statements, I performed a search for keywords appearing in the At-Issue Statements and reviewed each of the results to determine if the broadcast included a republication of an at-issue statement. The search yielded a total of 30 broadcasts, which included programs on NBC, MSNBC, FOX, CNN, CBS, BBC News, and ABC. To estimate the number of impressions these programs received, I consulted public reports of viewership for each program,[330] which are usually derived from Nielsen, the leading source for audience measurement.[331] A table showing the broadcasts considered, the ratings estimate, and the source of the rating estimate is included as Appendix G. On television, the At-Issue Statements were viewed 45,714,000 times.

E. Total impressions

137.   Total impressions are the sum of impressions calculated for each channel that disseminated the At-Issue Statements. This includes the aggregate of:

- estimated impressions for online news stories;

- direct video view data and estimated post view data from Facebook;

- direct video view data and estimated post view data from Instagram;

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[330]   For example, https://ustvdb.com/networks/nbc/shows/today/; data from the date published closest to the broadcast was used, if two dates with data available were equally spaced I used the lower figure to be conservative.

[331]   https://www.experian.com/blogs/marketing-forward/tv-measurement-2024/.

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- direct post view data from X;

- direct video view data from TikTok;

- direct video view data from YouTube; and

- ratings data from television broadcasts.

138.   To calculate the total impressions estimate across media, I aggregated views/impressions

for all channels. Based on this data, I have calculated a total of **116,959,530** impressions of the

At-Issue Statements. The table in Figure 10 below summarizes the results of the Impressions

Model, which can be found in full in Appendix G.

Figure 10. Total Impressions

Source Type	Impressions
Online News	3,559,144
TV	45,714,000
TikTok	41,544,100
YouTube	4,129,619
X	5,165,207
Instagram	10,566,868
Facebook	6,280,592
TOTAL	**116,959,530**

F. My calculation is conservative

139.   The methodology and conclusions of my Impressions Model are conservative, as there

are many repetitions and republications of the At-Issue Statements that I have not included in my

calculations. In this section, I enumerate some of the other places where the At-Issue Statements

have been spread that have not been included in my assessment, along with other reasons my

calculation is conservative.

140.   My calculation of impressions for news articles is intentionally limited in scope and, as a

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result, underrepresents the total number of impressions. The estimate is based on a single day of traffic data which is derived by dividing the monthly unique visitor counts for the month of the article's publication, adjusted to exclude bounce rates, by thirty. This approach is conservative because it excludes any impressions accumulated after the article's publication date. Furthermore, articles that were not prominently positioned near the top of the subfolder homepage are excluded from the calculation.

141.   In addition to the methodological limitations described above, my impressions calculation does not account for impressions or engagements across a range of additional platforms where the statements were also circulated. These include podcasts, Reddit threads, and content shared on other social media platforms, such as Rumble or Bluesky. Additionally, I did not consider syndication or online clips of the TV News segments included in my Impressions Model. As noted above, I also understand that Mr. Freedman has continued to make statements about Ms. Lively, which, while not at-issue in this matter, repeat the defamatory claims, including the notions that Ms. Lively has made false accusations and that she is a "bully."[332] I do not include the impressions derived from his ongoing statements in my calculation, despite circulation of those statements in widely viewed publications, including *TMZ* and *People Magazine*.

142.   The overall impression count is also conservative due to the relative inaccessibility of online video content through standard search tools. Identifying instances where the At-Issue Statements are repeated in video form through keyword searches is significantly more challenging than searching text-based posts. Videos are often poorly indexed, lack searchable transcripts, or are embedded on platforms with limited search functionality. As a result, locating

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[332]   *Lively v. Wayfarer, et al.*, 24-cv-10049 (S.D.N.Y.), Dkt. 546–47.

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and verifying online video content is time-consuming and incomplete, meaning many instances of video-based dissemination are likely omitted from my final impression count.

X. IMPACT ASSESSMENT

143.   As explained in Section VI, the At-Issue Statements about Ms. Lively generated more than 100 million impressions across online news, social media, and television. I next consider the impact of those statements on the consumers who were exposed to them based on the context in which they were seen. In particular, I consider whether the audience of the At-Issue Statements was receptive to them based on Mr. Freedman's position, profile, and credentials, his connection to Mr. Baldoni and the other Defendants, the credibility of the venues in which the statements were disseminated, and the endorsements of the statements by other trusted and well-known figures. Further, I consider the degree to which consumers formed associations between the defamatory claims and Ms. Lively and discuss how those associations harmed her reputation.

A. The audience of the At-Issue Statements were receptive to the defamatory claims

i.   Prior statements and social media content created a receptive audience for the At-Issue Statements

144.   As discussed above, Ms. Lively's reputation was harmed by the retaliation campaign that began in August 2024. This campaign introduced and/or strengthened negative associations with Ms. Lively that increase consumer receptivity to the At-Issue Statements. In particular, the widely discussed allegations that Ms. Lively was leveraging her influence and resources to attempt to surreptitiously take control of *It Ends With Us* creates the conditions under which consumers are more receptive to the At-Issue Statements that make similar, congruent claims (e.g., that Ms. Lively was using "allegations of sexual harassment" to become the "de facto director"). Indeed, as discussed previously, it is well-established that consumers who are

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repeatedly exposed to similar information about a subject are more likely to believe it (the "illusory truth effect"). More generally, consumers who came to view Ms. Lively more negatively as a result of the retaliation campaign are also more likely to be receptive to additional negative information about Ms. Lively, such as that contained within the At-Issue Statements.

ii.   **Mr. Freedman's notoriety positioned him to many audiences as an informed and trusted source**

145.   Mr. Freedman is an attorney who is known publicly for his many high-profile clients and the numerous highly publicized matters he has handled. He was listed as one of *Mediaite*'s Most Influential in News Media 2023.[333] Mr. Freedman has represented some of the biggest names in the entertainment industry, including, among others, Seth Rogen, Julia Roberts, Robert Downey Jr., Christopher Nolan, Quentin Tarantino, Mariah Carey, Alanis Morisette, Tucker Carlson, and Kevin Spacey.[334] In the New York Times' 2023 coverage of Mr. Carlson's hiring of Mr. Freedman, the newspaper referred to him as a "top Hollywood lawyer" known to for his "track record of getting multimillion-dollar settlements for TV stars."[335]

146.   Notably, Mr. Freedman regularly receives public endorsement from his well-known client base. This includes endorsements from public figures such as Deborah Dugan, the former chief executive of the Recording Academy, the organization behind the Grammys,[336] musician FKA Twigs,[337] as well as Chris Harrison, the former host of "The Bachelor."[338]

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[333]   https://lftcllp.com/lawyers/bryan-j-freedman/.
[334]   https://lftcllp.com/lawyers/bryan-j-freedman/; https://www.hollywoodreporter.com/business/business-news/entertainment-lawyer-bryan-freedman-hollywood-dark-knight-1235919993/.
[335]   https://www.nytimes.com/2023/04/25/business/media/carlson-lemon-lawyer-freedman.html.
[336]   https://www.hollywoodreporter.com/business/business-news/entertainment-lawyer-bryan-freedman-hollywood-dark-knight-1235919993/.
[337]   https://www.hollywoodreporter.com/business/business-news/entertainment-lawyer-bryan-freedman-hollywood-dark-knight-1235919993/.
[338]   https://www.latimes.com/la-influential/story/2024-07-07/bryan-freedman-hollywood-lawyer (accessed at https://archive.is/wEzm2).

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147.   As discussed above, information that comes from trusted or credible sources is more

likely to be believed than other information. Because Mr. Freedman has a reputation and history

as a high-profile, successful attorney for media figures, and because he is presented as having

specialized knowledge about the conflict between Mr. Baldoni and Ms. Lively, his public

statements carry additional credibility in the eyes of consumers.

148.   Mr. Freedman has discussed the case with the press a number of times in his capacity as

Mr. Baldoni's lawyer.[339] As Mr. Baldoni's attorney, Mr. Freedman has access to information

unavailable to the general public regarding the case and he has, on numerous occasions, been

presented as an informed source in his public appearances.[340] For example, in one of Mr.

Freedman's appearances on the Megyn Kelly show, Ms. Kelly stated that Mr. Freedman was

back to "bring you the story straight from the source's mouth" and that "there's no one better to

talk to about what actually happened here than the man who represents Justin Baldoni."[341]

149.   Media coverage of Mr. Freedman also positioned him as a credible source. One article,

highlighted Mr. Freedman's reputation for litigating in the court of public opinion to position

himself as a defender of the underdog.[342] It went on to describe Mr. Freedman's strategy in this

matter as betting on the belief that "people prefer to identify with scrappy outsiders against

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[339]   See for example: https://www.hollywoodreporter.com/movies/movie-news/blake-lively-sues-justin-baldoni-
        sexual-harassment-1236092214/; https://deadline.com/2025/01/blake-lively-justin-baldoni-lawyer-latest-
        1236260673/; https://deadline.com/2025/01/blake-lively-justin-baldoni-lawyer-latest-1236260673/;
        https://pagesix.com/2025/01/25/celebrity-news/justin-baldonis-lawyer-says-he-wont-be-bullied-into-silence-
        by-petrified-blake-lively-ryan-reynolds-after-gag-order-request/;
        https://www.megynkelly.com/2025/01/07/justin-baldoni-text-messages-with-it-ends-with-us-editors-about-
        blake-lively/.
[340]   See for example regarding reputability of lawyers in public statements:
        https://socialmediablawg.blogs.pace.edu/2021/06/26/why-it-matters-lawyers-the-spread-of-misinformation-
        and-social-media/; https://www.tiktok.com/@adrianne.louie/video/7457887853083708718.
[341]   https://www.megynkelly.com/watch/ep-1092-justin-baldonis-lawyer-says-he-wont-settle-with-blake-lively-
        and-what-comes-next-in-the-case/.
[342]   https://www.hollywoodreporter.com/business/business-news/justin-baldoni-attorney-bryan-freedman-cant-
        lose-1236142321/.

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institutional insiders," and in his capacity as Mr. Baldoni's attorney, that Mr. Freedman's

framing of Ms. Lively, half of "one of Hollywood's most powerful couples" and as the "popular

mean girl" has proven effective.[343] It also noted that Mr. Freedman's "passion appears genuine,

even personal," and that this is "often a winning strategy" in the court of public opinion.[344]

iii.   Mr. Baldoni and Wayfarer's reputation for feminism and progressive activism leant additional credibility to the At-Issue Statements

150.   The At-Issue Statements are also leant additional credibility because of the association

between Mr. Freedman and Mr. Baldoni. Prior to the conflict with Ms. Lively, Mr. Baldoni's

public image was built around values of integrity, empathy, and social responsibility.[345] He

positioned himself as an advocate for cultural change and has led many discussions of feminism

and modern masculinity.[346] He has also conducted public philanthropy, including supporting and

promoting initiatives that focus on community service and social justice, such as support for the

homeless population in Los Angeles and for domestic abuse victims.[347] Additionally, his

bestselling book *Man Enough* is a reflection on masculinity, vulnerability, gender expectations,

and personal growth,[348] which serves to position him to his fan base as authentic.

151.   Mr. Baldoni, and Mr. Freedman by extension, are associated with the Wayfarer Studios, a

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[343]   https://www.hollywoodreporter.com/business/business-news/justin-baldoni-attorney-bryan-freedman-cant-lose-1236142321/.

[344]   https://www.hollywoodreporter.com/business/business-news/justin-baldoni-attorney-bryan-freedman-cant-lose-1236142321/.

[345]   https://www.forbes.com/sites/marianneschnall/2022/01/12/interview-with-justin-baldoni-undefining-what-it-means-to-be-man-enough-and-enacting-social-change-through-media/, archived at https://archive.ph/WHQwZ.

[346]   See, for example, https://www.ted.com/speakers/justin_baldoni, https://variety.com/2017/tv/news/justin-baldoni-talk-show-the-mens-room-1202488304/ and https://www.forbes.com/sites/marianneschnall/2022/01/12/interview-with-justin-baldoni-undefining-what-it-means-to-be-man-enough-and-enacting-social-change-through-media/, archived at https://archive.ph/WHQwZ.

[347]   https://www.vice.com/en/article/this-los-angeles-block-party-is-all-about-helping-the-homeless/ and https://variety.com/2024/film/news/it-ends-with-us-justin-baldoni-nonprofit-wayfarer-studios-no-more-1236107116/.

[348]   https://manenough.com/man-enough-undefining-my-masculinity/.

production company "actively developing, producing, and fully financing a slate of highly

original, genre-defining, and globally impactful feature films, episodic television, documentaries,

unscripted series, and podcasts" with a focus on using stories to "serve as true agents for social

change."[349] The positive associations of Mr. Baldoni, Wayfarer Studios, and the other

Defendants lend additional credibility to the At-Issue Statements, which is likely to increase

consumer receptivity toward them.

iv.   The At-Issue Statements appeared in/on trusted publications and shows

152.   The At-Issue Statements were directly quoted in mainstream media outlets that tend to be

trusted by their readerships, such as *The New York Times, The Hollywood Reporter,* and

Deadline. The placement of direct quotations from Mr. Freedman in mainstream media sources

serves to increase audience trust in their truth value if they are receptive to Mr. Freedman (or his

associates, such as Mr. Baldoni) as a trusted source. *The New York Times,* for example, is one of

the most widely read news outlets in the United States and has a net positive trust score among

Americans.[350] *The Hollywood Reporter* describes itself as "the premier destination & most

widely trusted resource for entertainment news, reviews, videos & more."[351] Similarly, *Deadline*

Hollywood, known as *Deadline*, describes itself as "the authoritative source for breaking news in

the entertainment industry." *Deadline* goes on to note it "is regularly included on lists of top

entertainment websites" and that "its postings regularly receive more reader comments than all

of the entertainment industry news sites combined."[352]

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[349]   https://www.wayfarerstudios.com/.
[350]   Specifically, *The New York Times* "percentage point difference between the percentages who say each source is trustworthy or very trustworthy and the percentage who say it is untrustworthy or very untrustworthy" was +14. https://today.yougov.com/politics/articles/52272-trust-in-media-2025-which-news-sources-americans-use-and-trust.
[351]   https://x.com/thr.
[352]   https://deadline.com/about-dhd/.

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153.   A third-party analysis of each of *The New York Times, The Hollywood Reporter* and *Deadline* "rate[s] them high for factual reporting due to proper sourcing and a clean fact-check record."[353] Many consumers report in online comments that they view both *The Hollywood Reporter* and *Deadline* as key trustworthy industry publications, commenting that *The Hollywood Reporter* and *Deadline* are "the golden standard" for reporting on the film industry, along with *Variety*.[354] One commenter explained: "Do I think [*The Hollywood Reporter*] makes stuff up like US Weekly or the tabloids do? No, it's not that type of publication."[355] Another commenter explained that reporting by *The Hollywood Reporter* helps to legitimize information, commenting: "just the fact that THR is publishing gives the story weight."[356]

154.   The At-Issue Statements were also discussed and played on several TV news networks, including the major cable news channels (CNN, Fox News, and MSNBC) as well as the major broadcasting networks (ABC, CBS, and NBC.) These networks are the most watched news channels in the U.S. according to Pew Research.[357] The three major broadcast networks are widely trusted by Americans.[358] The At-Issue Statements also appeared on BBC news coverage, which is a highly trusted news source, according to Pew.[359]

155.   Similarly, the At-Issue Statements appeared on major "new media" platforms, such as Megyn Kelly's website. Ms. Kelly has over 3.7 million subscribers on YouTube[360] and 3.6

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[353]   https://mediabiasfactcheck.com/hollywood-reporter; https://mediabiasfactcheck.com/deadline-hollywood/; https://mediabiasfactcheck.com/new-york-times/.

[354]   https://www.reddit.com/r/movies/comments/hun828/what_website_do_you_recommend_to_follow_legit/ and https://www.reddit.com/r/DC_Cinematic/comments/bsnlev/discussion_what_are_the_most_reliable_and_least/.

[355]   https://www.disboards.com/threads/can-we-trust-hollywood-reporter-and-its-sources-on-who-becomes-disney%E2%80%99s-next-ceo.3968554/.

[356]   https://www.reddit.com/r/SaintMeghanMarkle/comments/1jo72s1/comment/mkpu1n2/.

[357]   https://www.pewresearch.org/journalism/feature/news-media-tracker/.

[358]   https://www.pewresearch.org/journalism/feature/news-media-tracker/.

[359]   https://www.pewresearch.org/journalism/feature/news-media-tracker/.

[360]   https://www.youtube.com/c/MegynKelly.

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million followers on X,[361] and is well-known.[362]

> v.   **Mr. Freedman's statements have been endorsed by prominent and influential people**

156.   Mr. Freedman's long list of well-known and influential clients – many of whom have publicly and enthusiastically endorsed his statements regarding this matter – increases the likelihood that many consumers will view him as a trusted authority on legal matters and, accordingly, be receptive to the At-Issue Statements.

157.   Social media influencers covering this matter have also framed Mr. Freedman as a credible source of information about the matter. For example, Perez Hilton, a social media influencer covering celebrity gossip, has asserted that one reason the people may be drawn to the case is that it "represents a real life David and Goliath."[363] He credits Mr. Freedman for his defense of the underdog and his willingness to speak out in public, stating that "Bryan Freedman doubled down and was adamant that he won't be bullied by Reynolds and Lively's Court requested gag order."[364] One commenter on the video posted that "Justin needs vindication and Mr. Freedman will get him that,"[365] another stating that "[Mr. Hilton's] David and Goliath reference was spot on."[366] In another video, Perez Hilton stated that Mr. Freedman's statements to the media about Ms. Lively were "extremely relevant" to the case and "not different than what any other attorney does."[367] He has repeatedly made similar statements, such as "Bryan Freedman is adamant that he's got all of the truth on his side and the points will be proven," and that he is now "firmly on the side of the truth and Baldoni because [he does] believe he is telling

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[361]   https://x.com/megynkelly.
[362]   https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-megyn-kelly.
[363]   https://www.youtube.com/watch?v=GQqxdeqs4wY.
[364]   https://www.youtube.com/watch?v=GQqxdeqs4wY.
[365]   https://www.youtube.com/watch?v=GQqxdeqs4wY&lc=UgyMr8j5lLMU3V9WGgV4AaABAg.
[366]   https://www.youtube.com/watch?v=GQqxdeqs4wY&lc=Ugxp7u7gmx5YHqja4rB4AaABAg.
[367]   https://www.youtube.com/watch?v=2h-Ml5nPYCw.

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the truth, the unedited, real truth."[368] One commenter on one of Perez Hilton's videos wrote that "[Baldoni's] attorney is a genius,"[369] another that they "love Bryan Freedman's genuine concern for Justin and the lies being told about him."[370]

158.   Candace Owens, another influencer that has publicly commented on the case, has also endorsed Mr. Freedman and his public statements.[371] Ms. Owens also endorsed Mr. Freedman's credibility, stating that she "doesn't think this is going to be very good for [Blake Lively]" because "[Mr. Freedman's] language … is a strong vote for me, is a strong vote that the public in the end is going to realize that Blake Lively was being manipulative."[372] In another video, she stated "I like Bryan Freedman, he seems like a tiger and I can just sense he's telling the truth."[373] One commenter on one of Ms. Owens' videos wrote "Brian won me over when he said.. we will sue her into oblivion," receiving nearly 8,000 likes.[374]

159.   The At-Issue Statements have also been endorsed by Megyn Kelly, a former client of Mr. Freedman.[375] In a TikTok video posted on January 7, 2025 by The Megyn Kelly Show, Mr. Freedman stated that he and Mr. Baldoni's team would be suing Ms. Lively "into oblivion."[376] Ms. Kelly described Mr. Freedman as an attorney who "fights for the ostracized loner who's getting dumped on," exactly as Mr. Freedman's public persona suggests.[377] Mr. Freedman

368   https://www.youtube.com/watch?v=6WsXUMztWzY; https://www.youtube.com/watch?v=GQqxdeqs4wY.
369   https://www.youtube.com/watch?v=6WsXUMztWzY&lc=Ugw7vEZvbCArsgdhAwB4AaABAg.
370   https://www.youtube.com/watch?v=GQqxdeqs4wY&lc=UgyMr8j5lLMU3V9WGgV4AaABAg.
371   See for example: https://www.tiktok.com/@candaceoshow/video/7460684437638941982;
       https://www.tiktok.com/@candaceoshow/video/7462967281748856095.
372   https://www.youtube.com/watch?v=7ngL8oCWbsQ.
373   https://www.tiktok.com/@candaceoshow/video/7460684437638941982.
374   www.tiktok.com/@candaceoshow/video/7462967281748856095?cid=
       NzQ2Mjk5NzAxMTY1MTk4NjE4NA.
375   See for example: https://www.megynkelly.com/2025/01/07/justin-baldoni-text-messages-with-it-ends-with-
       us-editors-about-blake-lively/.
376   https://www.tiktok.com/@megynkellyshow/video/7457306648286186783.
377   https://www.megynkelly.com/2025/01/07/justin-baldoni-text-messages-with-it-ends-with-us-editors-about-
       blake-lively/.

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continues that the suit is "full of evidence, admissions, documents, which prove exactly what

[Ms. Lively] did and how she bullied her way through the process to take over the movie and

used her PR people to try and destroy Justin."[378] One comment, with 113,000 likes, said "If a

lawyer is THIS direct…girl runnn."[379] Another that "when a lawyer sounds this confident, it

should be taken very very seriously. He knows exactly what he's saying. This means there's so

much evidence truly to back this up."[380] Another commenter claiming to be an attorney wrote, "a

lawyer here, we don't tell this to the press lightly," with 42,400 likes.[381]

vi.   Mr. Freedman was endorsed by other social media users

160.   Mr. Freedman's public appearances discussing the case have also garnered attention from

other social media users. One TikTok user stated that "Justin Baldoni's attorney Brian [sic]

Freedman is really out here giving a master class to all these other attorneys on how you're

supposed to go outside and do interviews on behalf of your client."[382] Commenters on the video

also expressed their belief that Mr. Freedman was credible, stating, "He's a phenomenal lawyer

and really good PR skills"[383] and "the way he speaks it's as if it's personal lol I want someone

like this on my team."[384] Another commenter attributed their trust in Mr. Freedman to an

endorsement from another celebrity, stating that they "saw a video of a journalist from one of the

big media companies and she said when she saw him representing Justin, he's gonna be in great

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[378]   https://www.tiktok.com/@megynkellyshow/video/7457306648286186783.
[379]   www.tiktok.com/@megynkellyshow/video/7457306648286186783?cid=
NzQ1NzQwNTc0OTMzNTQwOTQ1MA.
[380]   www.tiktok.com/@megynkellyshow/video/7457306648286186783?cid=
NzQ2MDQxMjgwMTIwNDY2NzE0Mg.
[381]   www.tiktok.com/@megynkellyshow/video/7457306648286186783?cid=
NzQ1NzM2NjE2MTA1MjAwOTIxNw.
[382]   https://www.tiktok.com/@adrianne.louie/video/7457887853083708718.
[383]   www.tiktok.com/@adrianne.louie/video/7457887853083708718?cid=NzQ1NzkzNjM5Mjc0MzMyMjQxNA.
[384]   www.tiktok.com/@adrianne.louie/video/7457887853083708718?cid=
NzQ1Nzk3OTQ3Nzk0ODkwODMxOA.

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hands because she was represented by him before."[385]

161.   News Nation also posted a TikTok version of an interview Mr. Freedman did with the

network in January 2025 where numerous users made positive statements about Mr. Freedman,

including "I like this lawyer,"[386] "Great lawyer and I believe Justin Baldoni,"[387] and "This

lawyer is on point. Justin is the victim."[388]

162.   In summary, Mr. Freedman was regularly presented as a credible source of information

by online influencers and other members of the media. This framing was echoed regularly by

consumers commenting on videos about Mr. Freedman, which indicates that, for many

consumers, Mr. Freedman and the At-Issue Statements about Ms. Lively were likely to be

viewed as credible.

vii.   Comments on posts containing the At-Issue Statements indicate viewers were broadly receptive to the defamatory claims

163.   Commenters on posts containing the At-Issue Statements indicate that they find the

statements to be credible and that they believe the defamatory claims. For example, one

commenter on a YouTube video of Mr. Freedman's appearance on The Megyn Kelly Show

explained they viewed Mr. Freedman highly, stating, "Justin and his team[…] did the right thing

to hire Freedman. This man is brilliant. He's not just smart, he's fierce as well. I hope they get

justice they deserve."[389] Another declared, "I agree with what Baldoni's lawyer is saying."[390]

One post on X in response to one of the At-Issue Statements noted, "I agree with his lawyers'

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[385]   www.tiktok.com/@adrianne.louie/video/7457887853083708718?cid=
NzQ1OTA1MTA2NDgzNjE3ODY5Ng.
[386]   https://www.tiktok.com/@newsnationnow/video/7457012502493187358.
[387]   www.tiktok.com/@newsnationnow/video/7457012502493187358?cid=
NzQ1NzE2NzAyOTY4Nzk5MzEzNA.
[388]   www.tiktok.com/@newsnationnow/video/7457012502493187358?cid=
NzQ1NzA0NDA3ODQzNTY0ODI2NA.
[389]   https://www.youtube.com/watch?v=Q4yniMqrlgI&lc=UgyjzgYrWhilbpZLajd4AaABAg.
[390]   https://www.instagram.com/p/DD2M87iTWKs/c/18084979354493811/.

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takes. There is too much published evidence that calls her claims into question, which brings all

her claims into question."[391] One poster even shared Mr. Freedman's statement with the message

"I trust him," as seen in Figure 11 below.

Figure 11. X user indicates trust in Mr. Freedman[392]
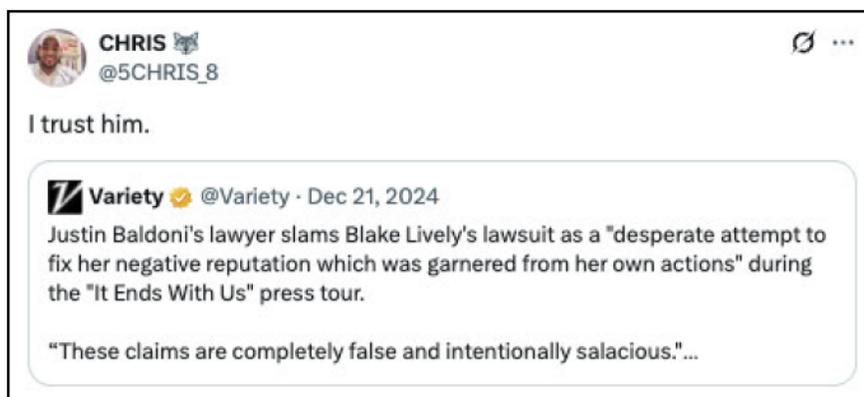
164.   Another user similarly shared one of the At-Issue Statements with the added message "I

believe the same thing." as shown in Figure 12 below.

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[391]   https://x.com/dont_be_common/status/1870531831562744185.
[392]   https://x.com/5CHRIS_8/status/1870615740551938395.

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Figure 12. X user indicates they believe the At-Issue Statement[393]

165.   Some commenters repeated the specific claims from the At-Issue Statements, including

that Ms. Lively is a liar. One such post compared her to "proven" liar Amber Heard: "Blake

Lively is Amber Heard in the making. […] She was proven to be a pathological liar! Let's wait

till ALL comes out! He is innocent until proven guilty. As of right now Blake Lively has been

proven to be a bully! Look at her past interviews!"[394] A commenter on a TikTok video that

included the At-Issue Statements repeated the notion that she is a liar, writing: "What do u think

now, when evidence showing Baldoni did nothing wrong and Lively was just lying ALOT??"[395]

Commenters also express a disbelief in Ms. Lively's allegations of sexual harassment. One

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[393]   https://x.com/LaIndiiuu/status/1870565220613280151.
[394]   https://x.com/paperkrums/status/1870859158825677037.
[395]   www.tiktok.com/@robandhaley/video/7451721565428796714?cid=NzQ1NTIzNzA0ODgwNDUyNDgyMg.

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comment, for example, explained "But it doesn't even sound like he was sexually harassing

her."[396] Another user on TikTok questioned, "Sexual harassment?! So why did she continue with

the movie, do a press tour, involved her husband? Then to later file this suit? And not even stick

up about abuse that women go through"[397] to which another user simply replied: "its a lie."[398]

166.   Other commenters simply noted that they did not believe Ms. Lively, implying they

believed the defamatory claim that Ms. Lively lied about her allegations of sexual harassment.

Exemplary comments include the following:

- "I don't believe her for a second..."[399]

- "Just because a woman files a complaint doesn't mean we all need to believe her. It's clear she's using this lawsuit to change her own narrative of being a rude, entitled bully. Blake is beyond disgusting."[400]

- "How in the world would she think ANYONE would believe this????"[401]

- "sorry I don't believe Blake's story at all."[402]

- "Don't believe her"[403]

- "Why is she lying?"[404]

- "Sorry i can't believe her"[405]

167.   The example comments above indicate that people exposed to the defamatory claims

about Ms. Lively often trusted Mr. Freedman, repeated the defamatory claims, and did not view

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[396]   https://www.instagram.com/p/DD2PtezBIF2/c/18051113095872791/.
[397]   www.tiktok.com/@people/video/7450882344799505694?cid=NzQ1MDg4OTQ3Mzk0NjIwNzAxOA.
[398]   www.tiktok.com/@people/video/7450882344799505694?cid=NzQ1MDk4NDg4OTUxODY1NDIzOQ.
[399]   https://www.youtube.com/watch?v=-qcRGWgL9Ow&lc=Ugxa_DuG4lOjrg9PhV14AaABAg.
[400]   https://www.youtube.com/watch?v=-qcRGWgL9Ow&lc=UgxG8tkYeM-U-UYRFoR4AaABAg.
[401]   www.tiktok.com/@dailymail/video/7450903492358573358?cid=NzQ1MDk2Mzk3ODE4NjA5NzQzOA.
[402]   www.tiktok.com/@bbcnews/video/7451985672899956001?cid=NzQ1MjgzMTUxMTEwNTMwNzM5OA.
[403]   https://www.instagram.com/p/DD2vZe_vbNo/c/18014339429474425/.
[404]   https://www.instagram.com/p/DD2vZe_vbNo/c/18027150743574421/.
[405]   https://www.instagram.com/p/DD2PtezBIF2/c/17886640788163876/.

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Ms. Lively as credible.

B. The At-Issue Statements damaged Ms. Lively's reputation

168.   In this section, I assess the dissemination and consumer reaction to the defamatory claims and the extent to which consumers have formed new, and/or strengthened existing, negative attitudes with Ms. Lively related to these claims, thereby damaging her reputation and person brand in the public sphere.

i.   The defamatory claims were spread widely through prominent sources

169.   In addition to the spread of the At-Issue Statements, other influential people have also spread the defamatory claims about Ms. Lively in social media posts that have generated millions of impressions. For example, as detailed below, Ms. Owens, Mr. Hilton, and Ms. Kelly, each of whom have large online followings, have frequently discussed Ms. Lively, accused her of being a liar, and asserted that no sexual harassment occurred—opinions which they formed, at least in part, because of the At-Issue Statements. Coming from these sources, who are trusted by their respective audiences, the negative associations are more likely to be believed as credible.

170.   Ms. Owens has 4.8 million followers on TikTok,[406] 5.6 million followers on Instagram,[407] and 4.5 million subscribers on YouTube.[408] One TikTok about the conflict between Mr. Baldoni and Ms. Lively in which Ms. Owens asserts that she believes Ms. Lively is "100% wrong" and describes filings in her Complaint as "doctored correspondences" received 3.6 million views.[409] In another video which received 2.6 million views, Ms. Owens tells Ms. Lively to drop the

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[406]   https://www.tiktok.com/@candaceoshow?lang=en.
[407]   https://www.instagram.com/realcandaceowens/?hl=en.
[408]   https://www.youtube.com/@RealCandaceO.
[409]   https://www.tiktok.com/@candaceoshow/video/7457758049760005407?lang=en.

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lawsuit, implying it is improbable that she is telling the truth about being sexually assaulted.[410]

171.   Perez Hilton has over 550,000 followers on YouTube and over 920,000 followers on

Instagram.[411] Mr. Hilton has posted hundreds of videos about the "It Ends With Us saga," as he

calls it, on his YouTube channel.[412] Many of his videos about Ms. Lively, both about this matter

and generally, continually repeat the notion that Ms. Lively is a liar. One post, for example, titled

"Blake Lively Is NOT The Aggressor, She Claims" received 42,000 views,[413] and comments on

the video repeat the notion that Ms. Lively lied about being sexually harassed. One comment that

received 225 likes reads: "By the way, whatever happened to the Sexual Harassment claims? Did

she forget that she made those up, and has yet to provide any evidence?"[414]

172.   Similarly, Megyn Kelly's coverage of the At-Issue Statements and the larger conflict

between Mr. Baldoni and Ms. Lively has repeated the defamatory claims to millions of people.

Ms. Kelly has over 3.7 million subscribers on YouTube,[415] 2.1 million followers on her show's

Instagram page,[416] and 3.6 million followers on X.[417] One Instagram Reel that was seen over

490,000 times includes several assertions that Ms. Lively has lied in her allegations against Mr.

Baldoni and asserts that Ms. Lively's actions towards Mr. Baldoni are "not any way nice, fair,

nice, or just."[418] Many commenters agreed, with one declaring, "Blake couldn't tell the truth if

her life depended on it."[419]

173.   The At-Issue Statements were also recirculated by other users, some of whom have large

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410   https://www.tiktok.com/@candaceoshow/video/7460684437638941982.
411   https://www.instagram.com/theperezhilton/?hl=en.
412   https://www.youtube.com/@PerezHilton/search?query=lively.
413   https://www.youtube.com/watch?v=N0faMJqIefA.
414   https://www.youtube.com/watch?v=N0faMJqIefA.
415   https://www.youtube.com/c/MegynKelly.
416   https://www.instagram.com/megynkellyshow/?hl=en.
417   https://x.com/megynkelly.
418   https://www.instagram.com/reel/DI4jtndobKL/.
419   https://www.instagram.com/p/DI4jtndobKL/c/18032277179649516/.

followings themselves. In addition to influential people repeating the defamatory claims about Ms. Lively, TikTok videos repeating the claims amassed millions of views. For example, one TikTok references Mr. Freedman's appearance on The Megyn Kelly Show and repeats the claim that Ms. Lively lied about sexual harassment having occurred.[420] This video has 11,000,000 views and over 800,000 likes. Another TikTok with over 50,000 views and 4,800 likes discusses the legal processes, including in the caption, "she's a lying liar who continues to lie" alongside the "lying face" emoji, featuring a Pinocchio-esque long nose.[421]

174.   Another post with 21.9 million views presents an interview with Ms. Lively as evidence that her lawsuit is insincere and tells viewers that Mr. Baldoni "hired a really great attorney and he's not done," citing Mr. Freedman's appearance on the Megyn Kelly show.[422] One commenter on the post said, "She still creates her own narrative, completely self-serving. She forgets her own lies," receiving over 55,000 likes.[423] Another wrote, "She was about to gaslight the interviewer until Colleen stepped in," receiving 47,100 likes.[424]

175.   The defamatory claims also spread on Instagram and X. As discussed in detail below, on X, one of the most popular hashtags in discussion of Ms. Lively was "#BlakeLivelyIsALiar," which further perpetuates the defamatory claims. One user on X, for example, posted "Blake Lively is a liar" in a post that generated over 16,000 views, as shown in Figure 13 below.

[420] https://www.tiktok.com/@justplainzack/video/7457368476358036782.
[421] https://www.tiktok.com/@stephwithdadeets/video/7506539214650068255.
[422] https://www.tiktok.com/@mariannenafsu/video/7457376827909115167.
[423] www.tiktok.com/@mariannenafsu/video/7457376827909115167?cid=NzQ1NzM4MDMzNDAxMjAwNzIxMQ.
[424] www.tiktok.com/@mariannenafsu/video/7457376827909115167?cid=NzQ1Nzc2OTE1MzY3Nzg1MzQ4Ng.

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Figure 13. X post calling Ms. Lively a liar[425]

> **Mistie**
> @Mistie_Mo
>
> No matter what the outcome is Blake Lively is a liar. She ruined Justin Baldonis life for no good reason. This will always be my opinion. She's a horrible fucking person. And obviously has no shame in who she is deep down. Black heart beating black blood.
>
> 12:10 PM · Jun 24, 2025 · **16.2K** Views

176.   A post on Instagram, promoting an episode of the podcast "All About TRH," called Ms. Lively a liar in response to her placement on the TIME 100 Most Influential list, stating "Only in Hollyweird can being a liar land you on a 'Most Influential' list. Blake Lively named one of TIME's 100 while caught in a legal mess with Justin Baldoni."[426] The All About TRH Podcast account has over 44,000 followers.[427] The same post was also shared to X where it received over 40,000 views.[428]

177.   Another video, which received over 10,000 views across posts on Instagram[429] and TikTok,[430] repeats multiple times that Ms. Lively "is a big liar" and references Mr. Freedman as a source of information. One TikTok, explaining that Mr. Baldoni was in attendance for Ms. Lively's deposition in this matter, implied she was a liar trying to "fit whatever narrative she's trying to fit" while "under oath with a penalty of perjury."[431] The video received over 1.1 million views, and many commenters echoed the claim that she is a liar:

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[425]   https://x.com/Mistie_Mo/status/1937543940447797592.
[426]   https://www.instagram.com/p/DIgwz9BRRX7/.
[427]   https://www.instagram.com/allabouttrhpodcast/
[428]   https://x.com/AllAboutTRH/status/1912523156281085958.
[429]   https://www.instagram.com/reel/DLN_Rv0M7SZ/.
[430]   https://www.tiktok.com/@staceymcgunnigle/video/7518167012699426078.
[431]   https://www.tiktok.com/@justplainzack/video/7533312105609465143.

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- "She's literally a compulsive liar, she will not care she's under oath"[432]

- "Under oath or not, I believe she would still lie"[433]

- "She's an actress she will lie to their faces"[434]

- "Smart on his part. She's a pathological liar. Now she'll have to work harder."[435]

- "Great move he can give them info on the go when she lies"[436]

178.   The At-Issue Statements became widely circulated in online news and social media, generating more than 100 million impressions across different sources. The defamatory claims were widely discussed by both influential people with large followings and by many others online. Given their sources and the receptive environment, the At-Issue Statements shifted associations with Ms. Lively in the public sphere, introducing new, negative associations such as that she was a "liar" and the belief that she was a person who fabricates claims of sexual harassment to further her own agenda.

        ii.   The defamatory claims have been incorporated into the overall discussion of Ms. Lively

179.   In addition to being widely spread, an analysis of the overall conversation about Ms. Lively in the period following the publication of the At-Issue Statements indicates that the defamatory claims were incorporated into the overall discussion of Ms. Lively.

180.   An analysis of Reddit and X posts about Ms. Lively illustrates how the conversation

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[432]   www.tiktok.com/@justplainzack/video/7533312105609465143?cid=
NzUzMzMyMjgwODY4MTg3NDE4OQ.

[433]   www.tiktok.com/@justplainzack/video/7533312105609465143?cid=
NzUzMzM0ODY3MjIwNjg2NTE4Mw.

[434]   www.tiktok.com/@justplainzack/video/7533312105609465143?cid=
NzUzMzQ1MzUyNzMwMzE0NDIxMA.

[435]   www.tiktok.com/@justplainzack/video/7533312105609465143?cid=
NzUzMzQxODM3MTUwMjg1MDgyOQ.

[436]   www.tiktok.com/@justplainzack/video/7533312105609465143?cid=
NzUzMzMzODg2MDc3Mjc3MDU4Mg.

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about Ms. Lively shifted following the At-Issue Statements to incorporate an association with being a "liar".[437] To assess the prevalence of an association with lying, I gathered posts about Ms. Lively between October 1, 2024, and February 28, 2025, from Reddit and X.[438] I then searched for any posts that included one or more of a list of keywords related to the defamatory claims about Ms. Lively.[439] I divided the posts into before and after periods relative to the first At-Issue Statement on December 21, 2024, and searched for the prevalence of these keywords related to the defamatory claims. I then reviewed samples of posts from each of X and Reddit that contained one or more of the terms associated with the defamatory claims to assess whether the post actually included a defamatory claim.[440]

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[437]   I used Brandwatch, an industry-leading historical social media database, to search and analyze social media posts. Brandwatch is an Official X Partner, meaning it has access to all historical public posts and a real-time feed to the X platform (see, https://www.brandwatch.com/datanetworks/x/.) Brandwatch also is an Official Reddit Partner, meaning it has access to all historical public posts and comments and a real-time feed to the Reddit platform (see, https://www.brandwatch.com/partnerships/reddit/.) Brandwatch allows users to identify posts of interest by designing queries containing words and phrases linked together using Boolean operators (i.e., AND, OR, and NOT). https://consumer-research-help.brandwatch.com/hc/en-us/articles/360012098098-Query-Operators.

[438]   My Brandwatch query for identifying posts about Ms. Lively was as follows:
  "Blake Lively" OR blakelively* OR #*blake*lively* OR #blakelively*
  I limited the Brandwatch search to posts of the English language published since October 2024.

[439]   The keywords in my analysis were: "liar," "lied," "lies," "self serving," "selfish," "false accusations," "false allegations," "fake," "delulu," "delusional," "faker," "not believable," "amber heard," "amberheard." I added "amber heard" and "amberheard" to my analysis after noticing their high frequency in posts about Ms. Lively and the way that posts were using the allusion to the Ms. Heard's case to call Ms. Lively a liar. My Brandwatch query for these keywords was as follows:
  lie OR lied OR lies OR lying OR liar OR liars OR "self serving" OR "self-serving" OR selfish* OR fake* OR delulu OR delusional* OR unbeliev* OR "not believable" OR "isn't believable" OR "false accusation" OR "false accusations" OR "false allegation" OR "false allegations" OR amberheard OR "amber heard"
  Reposts are excluded from the tabulation of the X posts (only original posts, replies, and quotes are included). The search was conducted using the search bar within Brandwatch dashboard (https://brandwatch-reviews-help.brandwatch.com/hc/en-us/articles/360020006658-Dashboards).

[440]   Specifically, I reviewed four sets of posts in total, which were comprised of a random selection of 400 posts from each of the before and after periods for X and Reddit. A sample of approximately 400 observations per group provides a 95% confidence interval with about a ±5 percentage-point margin of error for large populations, which is the benchmark for reliable manual evaluation. For the X before period, only 96 posts matched one or more of the keywords, so I reviewed each of these 96 posts instead of a sample. For the Reddit before period, only 208 posts matched one or more of the keywords, so I reviewed each of these 208 posts instead of a sample. I reviewed each post to note whether it includes an accusation that Ms. Lively was a liar, selfish, self-serving, or had uttered false allegations/accusations. I then calculated the true percentage of relevant posts that actually included a defamatory claim for the before period, and for the after period, I estimated this percentage by multiplying the share of relevant posts identified in the sample by the total population size.

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181.   In the period preceding the At-Issue Statements, online discussion of Ms. Lively rarely

associated her with dishonesty. On both X and Reddit, less than 0.1% of posts include the

defamatory claims prior to the At-Issue Statements. However, following the At-Issue Statements,

the share of posts containing a defamatory claim increased substantially, rising to 4% of X posts

and 1.9% of Reddit posts and comments (as shown in Figure 14 below). The increases in

frequency of these themes is statistically significant.[441]

Figure 14. The prevalence of the defamatory claims increased significantly following the At-Issue Statements

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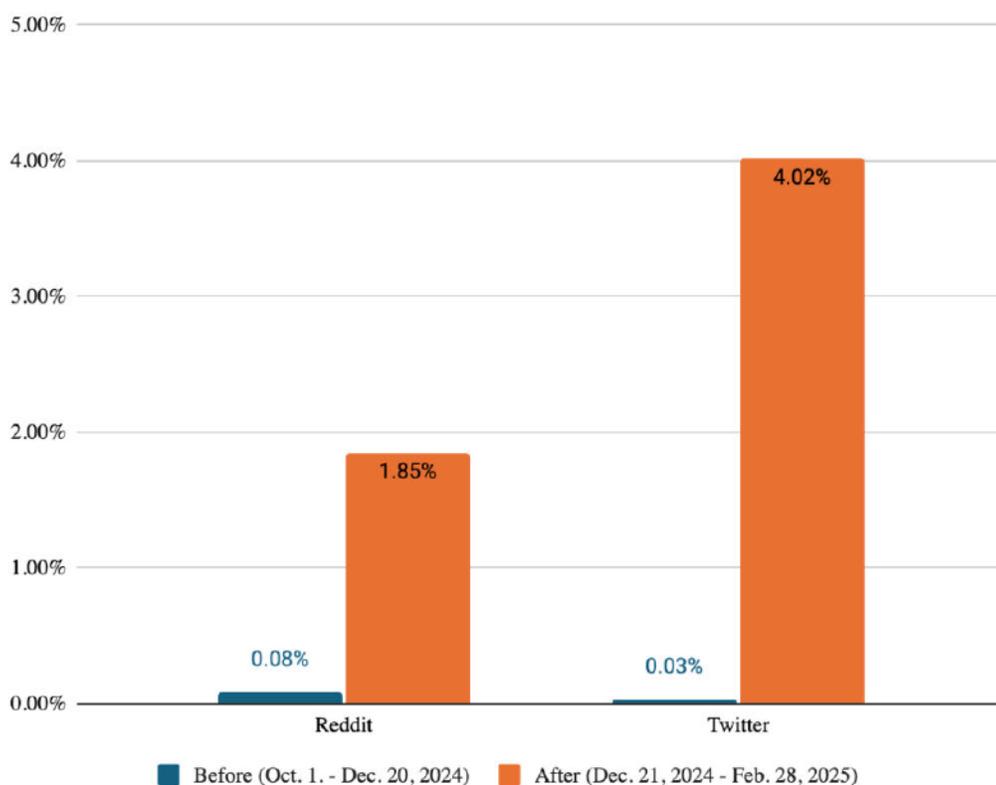
[441]   I tested whether the proportion of posts containing defamatory claims significantly increased between the before and after periods for each platform using two-proportion two-sided z-tests. For Reddit, the proportion increase is highly significant ($z \approx 14.86$, $p \approx 0.000$). For X, the proportion increase is likewise highly significant ($z \approx 19.91$, $p \approx 0.000$). In both cases, the probability that such differences arose by chance is vanishingly small, indicating a statistically robust post-period increase in defamatory content.

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182.   An analysis of the most common hashtags associated with Ms. Lively also shows how the

At-Issue Statements were incorporated into the public's perception of her. In the period prior to

the At-Issue Statements, the top hashtags used in X posts and retweets referencing Ms. Lively

related primarily to her professional work, including her performance in *It Ends With Us* and

discussion of *Deadpool*.[442] Following the publication of the At-Issue Statements, this rapidly

changed. As shown in Figure 15, the hashtag #BlakeLivelyIsALiar began to appear during the

period of time in which the At-Issue Statements were published (shown in red).

Figure 15. The #BlakeLivelyIsALiar hashtag rose to prominence during the period of time when the At-Issue Statements were made[443]
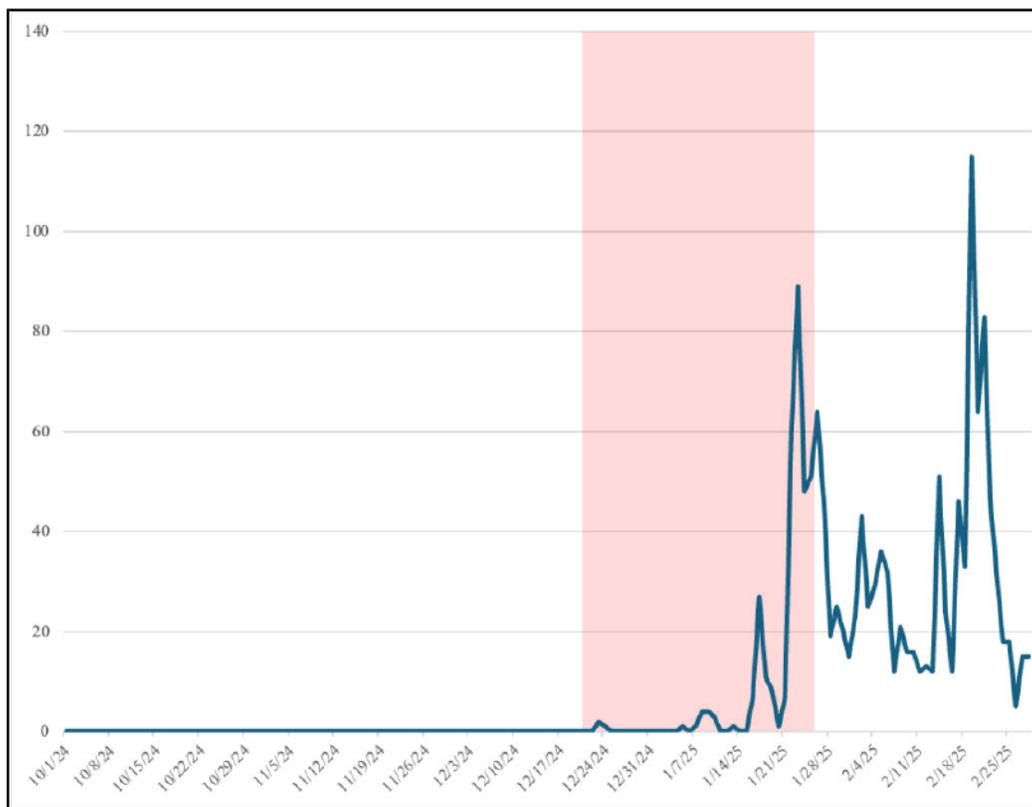
183.   From December 21, 2024 through February 28, 2025, two of the ten most commonly

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[442]   Data for this analysis is included in my backup data in the file titled "top hashtags_after period.csv."
[443]   Data for this analysis is included in my backup data in the file titled "blakelivelyisaliar hashtag daily volume.csv."

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appearing hashtags on posts referencing Ms. Lively were #blakelivelyisabully at number six and #blakelivelyisaliar at number seven, both of which reference the defamatory claims.[444] Other popular hashtags related to the defamatory claims in this same post-lawsuit period include #amberheard, #blakethesnake, and #boycottbettybuzz.[445] As with the #blakelivelyisaliar hashtag, none of these hashtags were frequently used in the period before the At-Issue Statements.[446] The sudden use of these hashtags at such a high frequency indicates a fundamental shift in the overall perception of Ms. Lively.

184.   One indication that the At-Issue Statements had a substantial impact on Ms. Lively's reputation is the fact that many people go on to proactively repeat them elsewhere. In this case, there are myriad examples of users repeating the defamatory claims on Ms. Lively's Instagram account. To assess this measure of the extent to which the defamatory claims have impacted consumer perceptions of Ms. Lively, I analyzed posts on Ms. Lively's Instagram account since December 2024.[447] There were nine posts in total that had fully enabled comments during this time period.[448] Comments on these posts comprised the dataset of this analysis.

185.   I performed a keyword analysis of those nine posts, searching for comments that included one or more of a list of keywords related to the defamatory claims made by Mr. Freedman about Ms. Lively.[449] Of the 19,340 total comments on the nine posts from Ms. Lively's Instagram, 784

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[444]   Data for this analysis is included in my backup data in the file titled "top hashtags_after period.csv."
[445]   Data for this analysis is included in my backup data in the file titled "top hashtags_after period.csv."
[446]   Data for this analysis is included in my backup data in the file titled "top hashtags_before period.csv."
[447]   I consider comments posted on or after December 21, 2024. The most recent comment considered in my analysis was from August 13, 2025.
[448]   Other posts had comments but were evidently restricted with only very few, all of which were positive.
[449]   The keywords in my analysis were: "liar," "lied," "lies," "self serving," "selfish," "false accusations," "false allegations," "fake," "delulu," "delusional," "faker," "not believable," "amber heard," "amberheard." My query for these keywords was as follows:
    lie OR lied OR lies OR lying OR liar OR liars OR "self serving" OR "self-serving" OR selfish* OR fake* OR delulu OR delusional* OR unbeliev* OR "not believable" OR "isn't believable" OR "false accusation" OR "false accusations" OR "false allegation" OR "false allegations" OR amberheard OR "amber heard"

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contained one of the keywords, a rate of 4% overall.[450] In my experience performing linguistic

and keyword analysis, this is a meaningful percentage of the overall comments on Ms. Lively's

posts.[451] Moreover, I consider this to be a conservative estimate of the frequency at which users'

comments demonstrate receptivity to the At-Issue Statements given the range of highly negative

comments I encountered that did not include the keywords, for instance:

- "Blake, the only way you can begin to save yourself is by seeking help and checking into
  a mental health facility. It's clear that you're struggling, and the story you've fabricated
  about SH is only damaging your reputation further. The truth is catching up with you,
  exposing you and the people enabling this."[452]

- "Biggest C in Hollywood. I'll be shocked if any man will ever work with her again. She's
  the girl who cries wolf when a man shuts her down."[453]

186.   Further, my estimate is an undercount because of the inherent difficulties in making a

keyword search comprehensive due to the variety of ways that consumers could share their

opinions in comments, and the fact that they do not always attribute their negative comments to a

source or reason. For example, when one commenter writes "Blake, we will never forgive. We

will never forget,"[454] it is not explicitly clear what they will never forgive or forget, but the

comment implies a set of fixed beliefs about Ms. Lively. Comments like these are negative but

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[450]   Data for this analysis is included in my backup data in the file titled "all instagram posts with query
        matches.csv." Instagram limits the ability to load all comments on large or highly engaged posts. The
        platform often stops rendering additional comments or returns an error after a certain number of "load more
        replies" interactions. Accordingly, all comments were collected whenever feasible; where that was not
        possible, top-level comments (excluding replies) were retrieved. For two particularly high-traffic posts where
        even top-level comments could not be fully accessed, as many as possible were collected before the interface
        ceased loading. My conclusions hold even when restricting the analysis to the defamatory statement period
        and the period immediately thereafter. Specifically, the share of posts containing one or more of these
        keywords is 7% from December 21, 2024 - February 28, 2025. As a benchmark, I also found that 3.3% of the
        comments mentioned Ryan Reynolds or his Instagram handle (*ryan OR reynolds OR ryanreynolds OR
        vancityreynolds*) and 5.6% mentioned Justin Baldoni or his Instagram handle (*justinbaldoni OR baldoni OR
        justin*), indicating that 4% is a strong association.
[451]   Humphreys, A., & Wang, R. J. H. (2018). Automated text analysis for consumer research. *Journal of
        Consumer Research*, 44(6), 1274-1306.
[452]   https://www.instagram.com/p/DDfwLB2OJgq/c/17980814150731287/?hl=en.
[453]   https://www.instagram.com/p/DJ_8TOrgE4_/c/17967464909929287/?hl=en.
[454]   https://www.instagram.com/p/DJ_8TOrgE4_/c/18018512330721096/?hl=en.

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would not be flagged by my keyword analysis.

187.   I identified hundreds of examples of consumers asserting that Ms. Lively is delusional and a liar, that they will boycott her work, that nothing can ever change their opinion, or otherwise demonstrating that they have been receptive to the defamatory claims. One user went so far as to directly quote Mr. Freedman: "'They (blake and ryan) have an interesting ability to go on victory tours whether they win or lose. So it doesn't even matter. I could see her losing in the case and going on a victory tour. But that's what we're dealing with.' - Bryan Freedman."[455]

188.   Many comments on Ms. Lively's Instagram posts reflect similar themes. For instance, one user wrote "You have zero credibility,"[456] receiving over 22,000 likes on the comment, another saying "Why apologize when you can file a frivolous lawsuit?"[457] receiving over 4,000 likes. Other comments included "Lies & Deceit! Blake & Ryans new names in Disneys new movie!"[458] and "It's heartbreaking to see my favorite actress turn out to be the bully. Honestly devastating. You did Baldoni so wrong."[459]

189.   Many users also echoed the claim that Ms. Lively is delusional, phrases like "Delulu Lively."[460] Users allege that Ms. Lively is lying, that she has mental health issues, and she is "fake." For example, one post says, "Keep in mind this all started with SH claims that have been demonstrably false and she has seemingly forgotten she even made them."[461] Users making these claims assert that in these lawsuits Ms. Lively has revealed her true amoral self, for instance:

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[455]   https://www.instagram.com/p/DJdFCbHp8mC/c/18083488114757421/?hl=en.
[456]   https://www.instagram.com/p/DDpUVxGvnEG/c/18477261565039673/?hl=en.
[457]   https://www.instagram.com/p/DDpUVxGvnEG/c/18058936285903182/?hl=en.
[458]   https://www.instagram.com/p/DJK8ubxS4Jt/c/17868518979332372/?hl=en.
[459]   https://www.instagram.com/p/DJHtCaRCeB7/c/18096097213590433/?hl=en.
[460]   See for example: https://www.instagram.com/p/DDCqaz7Ip-J/c/18119350792439225/?hl=en;
         https://www.instagram.com/p/DJHtCaRCeB7/c/17893717377278459/?hl=en;
         https://www.instagram.com/p/DDfwLB2OJgq/c/18069826685316085/?hl=en.
[461]   https://www.instagram.com/p/DJ_8TOrgE4_/c/18024765878518816/?hl=en.

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- "How does it feel that the whole world have seen you guys(Blake & Ryan.) your true colours, damn it's so petty! Why is it so hard to apologise and say sorry it was our ego!"[462]

- "Blake, the only way you can begin to save yourself is by seeking help and checking into a mental health facility. It's clear that you're struggling, and the story you've fabricated about SH is only damaging your reputation further. The truth is catching up with you, exposing you and the people enabling this."[463]

- "Damn. Simply not acknowledging all the hate hoping everyone will eventually doubt their reality.?.!. Top tier gaslighting"[464]

- "You may subpoena all the poor real people who give us real facts and find fake evidence to falsely accuse people and missuse law but get this in mind there is no where in the whole world where people will like you, we will never forget . You can live in your own bubble pay whatever money you are left with to have fake fans but you will know we will never want to see your face ever again."[465]

190.   Other comments on Ms. Lively's Instagram posts include similar claims that because of

the belief that she is an amoral liar, consumers will never change their opinion of her, that they

will never want to watch any future projects of hers, and that nobody will ever want to work with

her again. Some of these examples include:

- "Every word that comes out of your mouth is so fake . I am telling you if someone even pays me to change my mind on you I won't."[466]

- "No matter if you win this case, you are forever marked"[467]

- "Blake, we will never forgive. We will never forget."[468]

- "Justin Baldoni never had a bad word spoken about him until you came along. The public supports him 100%! However this ends , your finished."[469]

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[462]   https://www.instagram.com/p/DJdFCbHp8mC/c/18081738502849267/?hl=en.
[463]   https://www.instagram.com/p/DDfwLB2OJgq/c/17980814150731287/?hl=en.
[464]   https://www.instagram.com/p/DDpUVxGvnEG/c/18287029318174729/?hl=en.
[465]   https://www.instagram.com/p/DJ_8TOrgE4_/c/18051614162204708/?hl=en.
[466]   https://www.instagram.com/p/DJ_8TOrgE4_/c/18070952204019920/?hl=en.
[467]   https://www.instagram.com/p/DJ_8TOrgE4_/c/18083740603841004/?hl=en.
[468]   https://www.instagram.com/p/DJ_8TOrgE4_/c/18018512330721096/?hl=en.
[469]   https://www.instagram.com/p/DJdFCbHp8mC/c/17953833248828006/?hl=en.

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- "No one likes you Blake go fall off the planet any way you can"[470]

- "Biggest C in Hollywood. I'll be shocked if any man will ever work with her again. She's the girl who cries wolf when a man shuts her down."[471]

- "I haven't watched because of Blake. I won't buy anything she sells or is related to."[472]

- "Let's hit them where it hurts ….. let's make sure the pairs next films are box office fails"[473]

- "YOUR CAREER IS OVER BLAKE!"[474]

- "You're cancelled. You have already lost. Even if you win."[475]

- "THE ENTIRE PLANET HATES BLAKE LIVELY AND RYAN REYNOLDS"[476]

191.   Taken together, the number of negative consumer comments that repeat the defamatory claims indicate that consumers were broadly receptive to the At-Issue Statements, and that those claims contributed to the harm to Ms. Lively's reputation. This is evident from even a brief look through her Instagram where most posts have limited, controlled comments, and the rest are overrun by extremely negative comments. Especially when juxtaposed alongside the actual content of these posts, the negative comments are striking. Figure 16 below shows a screenshot from a post on Ms. Lively's account promoting her film *Another Simple Favor* with other members of the cast, and the comments that accompany it. Figure 17 below is a post of Ms. Lively promoting her line of sodas and mocktails, and some of the completely unrelated comments from consumers.

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[470]   https://www.instagram.com/p/DDfwLB2OJgq/c/17880532269215562/?hl=en.
[471]   https://www.instagram.com/p/DJ_8TOrgE4_/c/17967464909929287/?hl=en.
[472]   https://www.instagram.com/p/DJdFCbHp8mC/c/18029845604474870/?hl=en.
[473]   https://www.instagram.com/p/DJK8ubxS4Jt/c/18085065289680545/?hl=en.
[474]   https://www.instagram.com/p/DFqhOqZRc3z/c/17914058768983453/?hl=en.
[475]   https://www.instagram.com/p/DJ_8TOrgE4_/c/17976229838865335/?hl=en.
[476]   https://www.instagram.com/p/DDfwLB2OJgq/c/18447597421078466/?hl=en.

Figure 16. A user commenting on a post from Ms. Lively's Instagram promoting her film *Another Simple Favor*[477]

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Figure 17. Users' comments on Ms. Lively's post promoting her soda and mocktail company[478]
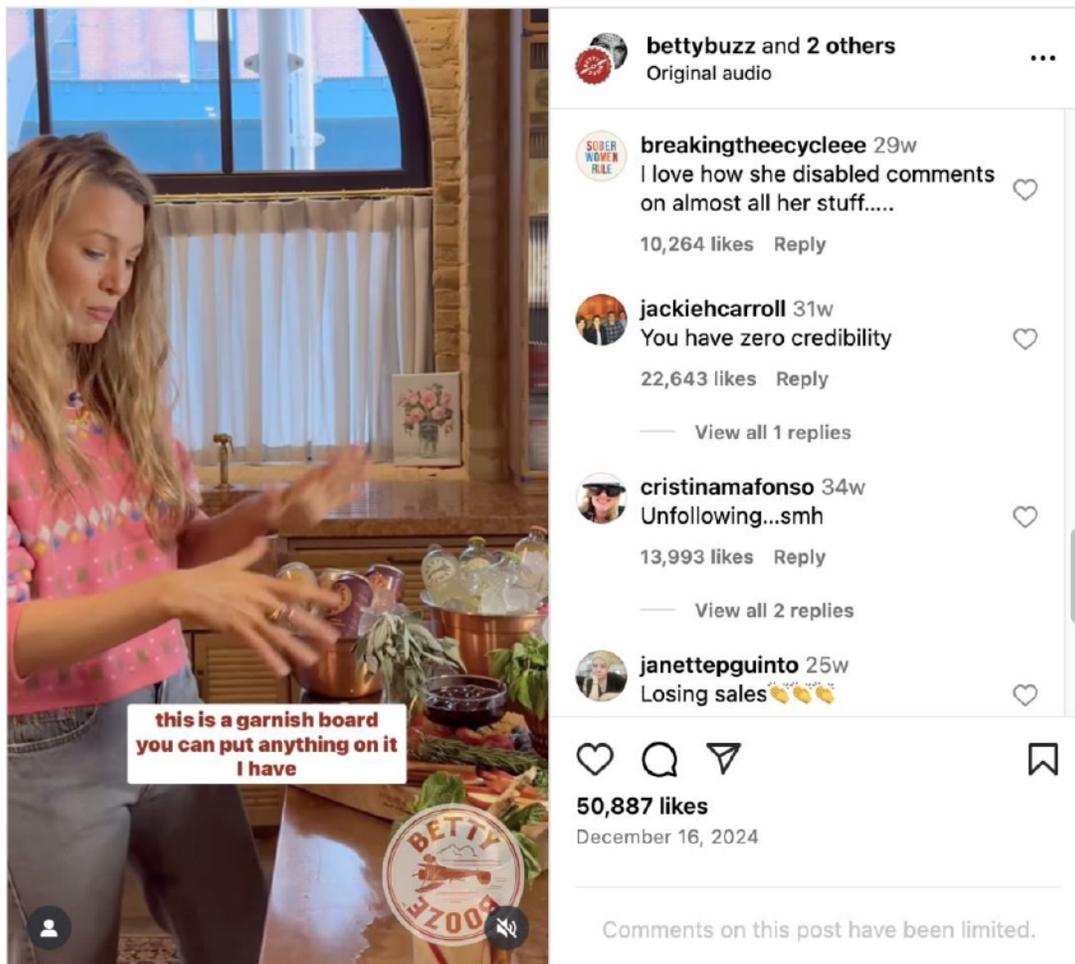
192.   Based on my expertise in reputation, social media, and marketing, and my analysis above, I can conclude that Ms. Lively's reputation has been harmed by the At-Issue Statements. The At-Issue Statements themselves originate from Mr. Freedman, a widely known attorney who is viewed by many consumers as a trusted source for information about Ms. Lively's allegations. They are also associated with Mr. Baldoni, who has a longstanding reputation as a feminist and advocate for modern masculinity. Consumers and online influencers have demonstrated receptivity to At-Issue Statements, either by affirming their belief in the defamatory claims or by

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[478]   https://www.instagram.com/p/DDpUVxGvnEG/?hl=en.

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going on to repeat those claims themselves in online comments and posts.

193.   In fact, untold numbers of online comments repeat the defamatory claims, which indicates that many consumers were receptive to the At-Issue Statements and that those statements drove attitudinal change toward Ms. Lively. Among posts mentioning Ms. Lively on X, the hashtag #BlakeLivelyIsALiar was the seventh most used hashtag in the period following the At-Issue Statements, which was coupled with the introduction of the defamatory claims into the general conversation about Ms. Lively.

194.   As discussed previously, reputational harm to a public figure like Ms. Lively will damage her person brand, which will in turn decrease the demand for her endorsement, make her a less desirable candidate for new acting roles, and cause harm to her existing businesses.[479] I expect that the same or similar consequences that Ms. Lively has suffered and/or is likely to suffer in the future due to the retaliation campaign will be amplified by the At-Issue Statements.

XI.   DAMAGES MODEL

195.   As detailed in the academic section, reputational harm occurs in the public sphere. The At-Issue Statements in this case introduced new negative associations with Ms. Lively's person brand that became widely disseminated online to a receptive audience. Repair of Ms. Lively's reputation must therefore also occur in the public sphere. Reputational repair campaigns through strategic communication are a mainstay of public relations[480] and are constituted by attempts to change attitudes that were created by the initial reputation-damaging claims. In this case, the reputational repair campaign would aim to correct existing attitudes related to the representation

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[479]   I do not include in my assessment of reputational damage the second-order impact that harm to Ms. Lively's reputation has on her acting career or other business interests.
[480]   https://pracademy.co.uk/insights/public-relations-as-reputation-management/.

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of Ms. Lively in the At-Issue Statements. The cost of a reputation repair campaign is therefore

one proxy for harm to Ms. Lively's reputation from the At-Issue Statements.

196.   This section details the methodology for calculating the costs to repair reputation damage

based on standard practices in public relations and strategic communications. The costs to repair

Ms. Lively's reputation are based on the calculation of the number of impressions of the At-Issue

Statements found in the Impressions Model.

A. Modeling reputational repair on social media

i.   Goals of a reputational repair campaign

197.   The goal of the corrective campaign is to counteract the harm done to Ms. Lively's

reputation by the At-Issue Statements. In this case, a corrective campaign would involve placing

corrective messaging and attempting to change existing attitudes through repeated exposure to

the message, a common method in persuasive communication.[481]

198.   In my opinion, and given the academic literature summarized, the sources of spread of

the defamatory publications, and the targeted audience, a campaign to repair Ms. Lively's

reputational damage would have to include (i) hiring influencers whom the audience regards as

trusted sources, (ii) ensuring that the audience is exposed to the message multiple times in order

to create attitude change, and (iii) extending the campaign for a long enough time to allow for

dissemination, given the multifaceted nature of effective corrective repair through online

channels. A holistic traditional and social media campaign that includes these integrated

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[481]   Cacioppo, John T and Richard E Petty (1980), "Persuasiveness of Communications Is Affected by Exposure
Frequency and Message Quality: A Theoretical and Empirical Analysis of Persisting Attitude Change,"
Current issues and research in advertising, 3 (1), 97-122; Wegener, Duane T., Natalie D. Smoak, Richard E.
Petty, and Leandre R. Fabrigar (2004). "Multiple routes to resisting attitude change." In *Resistance and
persuasion*, pp. 13-38. Psychology Press,; Petty, Richard E., Duane T. Wegener, and Leandre R. Fabrigar
(1997). "Attitudes and attitude change." *Annual review of psychology* 48, no. 1: 609-647.

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elements is therefore the most effective way to repair reputational damage in this case.[482]

199.   An effective campaign to repair reputational damage is typically multi-pronged and includes a mix of platforms and people. A typical social media campaign will combine display and video advertising, along with hiring influencers to promote a message via blogs or newsletters and on their podcasts, YouTube, and other channels. Because the source—and not just the message—is so critical to attitude change, particularly on social media, it is important to work with credible and likeable sources likely to gain traction with the intended audience. The social media campaign in this case should be combined with traditional media campaigns such as television ads, to match the source of the misimpressions about Ms. Lively.

200.   My methodology for a successful reputation repair campaign includes three key components: determining the target audience by calculating the proportion of the wider audience who was receptive to the At-Issue Statements; determining the mix of corrective media based on the original sources of dissemination of the At-Issue Statements; and calculating the amount of exposure required to change the minds of the targeted audience. Below I explain each of these aspects of the methodology and their support in the academic literature and accepted practice.

ii.   Determining the target audience

201.   The target audience for a repair campaign are consumers who viewed and were receptive to the At-Issue Statements. In this case, the At-Issue Statements were published by a variety of media outlets and were shared broadly on social media. The At-Issue Statements were attributed to Mr. Freedman, a well-known and highly regarded attorney who, as discussed above, was

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[482]   Shankar, V., and Kushwaha, T. (2020). "Omnichannel Marketing: Are Cross-Channel Effects Symmetric?" *International Journal of Research in Marketing,* 38(2), 290-310; Payne, E. M., Peltier, J. W., & Barger, V. A. (2017). "Omni-channel marketing, integrated marketing communications and consumer engagement: A research agenda." *Journal of Research in Interactive Marketing,* 11(2), 185–197.

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likely to be viewed as someone with access to private information about Ms. Lively's

allegations. Accordingly, it's likely that most consumers who were exposed to the At-Issue

Statements would have been receptive to his claims about Ms. Lively.

202.   However, because the At-Issue Statements were made in the context of a highly-

publicized and polarizing lawsuit, I have also considered overall consumer sentiment toward Ms.

Lively as an additional measure of receptivity. Consumers who view Ms. Lively in a strongly

positive manner are less likely to be receptive to Mr. Freedman's defamatory claims. Consumer

polling data from YouGov discussed above indicates that as of April 2, 2025 Ms. Lively was

viewed favorably by 44.8% of U.S. adults.[483] Accordingly, I incorporate a rate of 55.2% to

reflect the percentage of receptive impressions to the At-Issue Statements. I therefore calculate

the number of receptive impressions to be corrected as 64,914,839.

iii.   Media mix and channel costs

203.   To allocate media budget and media spend across each platform, I use the initial sources

of impressions made by the defamatory publications. In particular, I allocate spending for

corrective messages based on the percentages in which impressions of the At-Issue Statements

were generated across different media.

204.   To calculate costs, I use the industry standard of the cost per thousand impressions,

otherwise known as cost per mille (CPM), for each medium.[484] I calculated costs of advertising

as CPM multiplied by the target number of impressions of each channel or platform. I used

published industry standards for CPM for different channels and platform. In general, I matched

the source of impressions to the corrective method, as listed below:

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[483]   https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-blake-lively.
[484]   https://agencyanalytics.com/kpi-definitions/cost-per-thousand-cpm.

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- *Online news impressions*: corrected through native advertising

- *X, Facebook, TikTok, YouTube, and Instagram impressions*: corrected through trusted influencer social media posts on their respective accounts

- *Television impressions:* corrected through equivalent advertising space on broadcast television.

205.   For each channel, I used the average CPM for that particular medium (X influencer, broadcast tv advertisement, etc.). I then calculated how much it would cost to generate the number of impressions required to counter the defamatory claims. A breakdown of the channels and rates used and the target impressions for each can be found in Appendix H.

206.   While the content of the corrective messaging does not impact cost, I note that the purpose of the content is to share new, positive associations with Ms. Lively.[485] These could include credible endorsements of her new or forthcoming projects, lifestyle content related to her person brand, or any other messages that build positive associations with her reputation. The key focus of such a campaign would be to build positive associations to offset the negative associations introduced by the At-Issue Statements. Correction through online news channels, for example, can be constituted by advertorial campaigns that share positive information through editorial-like channels rather than "advertisements" or display ads per se.[486]

207.   My methodology includes accounting for impression rates on social media posts, whereby only a portion of followers of an account may actually see each individual post.[487] Taking impression rate into consideration is necessary because the number of followers is a

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[485]   Tybout, A. M., Calder, B. J., & Sternthal, B. (1981). "Using information processing theory to design marketing strategies." *Journal of Marketing Research*, 18(1), 73–79.

[486]   https://hbr.org/2015/07/comparing-the-roi-of-content-marketing-and-native-advertising and https://cxl.com/blog/advertorials/.

[487]   Humphreys, Ashlee and Rebecca Jen-Hui Wang (2018), "Automated text analysis for consumer research," *Journal of Consumer Research, 44*(6): 1274–1306.

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measure of reach that only represents the potential impressions of a message. Although a

message may be available to all followers, it is not necessarily seen by all followers for a variety

of reasons: only a subset of followers will sign on that day, they may follow multiple accounts

that compete for attention, or ranking algorithms may not prioritize the content. For these

reasons, information scientists incorporate an impression rate when calculating social media

impressions, which represents the chance that the message was seen by a follower.[488]

208.   For each social media platform, I based my calculation on existing research on views per

follower and similar measures of engagement. Social media analytics companies measure these

rates and provide impression rate information for a wide variety of clients and purposes.[489]

iv.   Attitude change multiplier

209.   As covered in the aforementioned literature, an existing attitude is not changed by one

impression alone. As such, in order to effectively change attitudes, a campaign must serve

multiple impressions per person in the target audience. This is true in traditional media,[490] but it

is particularly true in the crowded attention marketplace of social media. While prior research

has found that it requires about 3 to 5 impressions to change an attitude in traditional advertising

exposure, on social media the number of exposures may be even higher.[491]

210.   Taking into account the attention environment and the strong, polarized nature of

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[488]   Wang, L., Ramachandran, A., & Chaintreau, A. (2016). "Measuring Click and Share Dynamics on Social Media: A Reproducible and Validated Approach." *Proceedings of the International AAAI Conference on Web and Social Media*, 10(2), 108-113; Danny Sullivan, *Just Like Facebook, Twitter's New Impression Stats Suggest Few Followers See What's Tweeted*, MarTech (July 11, 2014), https://martech.org/facebook-twitter-impressions/.

[489]   See for example: https://www.rivaliq.com/; https://www.hootsuite.com/platform/analytics; https://sproutsocial.com/features/premium-analytics/.

[490]   Cacioppo, John T and Richard E Petty (1980), "Persuasiveness of Communications Is Affected by Exposure Frequency and Message Quality: A Theoretical and Empirical Analysis of Persisting Attitude Change," *Current issues and research in advertising*, 3 (1), 97-122.

[491]   Garrett, R. K. (2009). "Echo chambers online?: Politically motivated selective exposure among Internet news users." *Journal of computer-mediated communication*, 14(2), 265-285.

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attitudes (as discussed in the introduction to the reputation repair model above), I estimate that a message would need to be seen approximately 3 to 5 times *from a credible source* before it would lead to attitude change.

B. Costs of the corrective campaign

211.   Figure 18 below shows the total estimated costs of a corrective campaign. I include two costs: an estimate that incorporates an attitude change multiplier of 3 (at an estimated cost of $14,625,160) and a second estimate, which incorporates an attitude change multiplier of 5 (at an estimated cost of $24,375,267). As detailed above, it is my opinion that a multiplier of at least 3 would constitute the minimum corrective campaign to run, given the importance of multiple exposures and the likelihood that the audience will receive them and be affected by them.[492]

Figure 18. Total Cost for Corrective Campaign

Ad Messaging Multiplier	Cost
3x	$14,625,160
5x	$24,375,267

Dated: October 29, 2025

[signature]

Professor Ashlee Humphreys

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[492]   Cacioppo, John T and Richard E Petty (1980), "Persuasiveness of Communications Is Affected by Exposure Frequency and Message Quality: A Theoretical and Empirical Analysis of Persisting Attitude Change," *Current issues and research in advertising*, 3 (1), 97-122; Housholder, Elizabeth & Lamarre, Heather. (2014). "Facebook Politics: Toward a Process Model for Achieving Political Source Credibility Through Social Media." *Journal of Information Technology & Politics*, 11. 368-382; Weiss, Robert Frank (1969), "Repetition of Persuasion," *Psychological Reports*, 25 (2), 669-70.

Confidential

APPENDIX A – PROFESSOR HUMPHREYS' CV

ASHLEE HUMPHREYS

████████████████████

Integrated Marketing Communications   1870 Campus Drive
Medill School of Journalism   MTC 3-109
Northwestern University   Evanston, IL 60208

EDUCATION
Ph.D., Marketing, Kellogg School of Management, Northwestern University.
B.A., Economics, Philosophy, Northwestern University.

EMPLOYMENT
Northwestern University
Medill School of Journalism, Media, and Integrated Marketing Communications
Professor, September 2022 to present
Associate Professor, September 2015 to 2022
Assistant Professor, September 2008 to 2015
Kellogg School of Management, Joint Appointment
Professor, September 2022 to present
Associate Professor, January 2019 to 2022

BOOK
Humphreys, Ashlee (2016), *Social Media: Enduring Principles*, Oxford University Press.
2nd edition, forthcoming, 2023.

ONGOING
Digital Satisfaction Index, https://www.performics.com/about-us/intent-lab/.

JOURNAL PUBLICATIONS

Epp, Amber and Ashlee Humphreys (2025), "Collaborating with Generative AI in
Consumer Culture Research," *Journal of Consumer Research*, 52 (1), 32-48.

Corciolani, M., Giuliani, E., Humphreys, A., Nieri, F., Tuan, A. and Zajac, E.J. (2023),
Lost and Found in Translation: How Firms Use Anisomorphism to Manage the
Institutional Complexity of CSR. J. Manage. Stud. https://doi.org/10.1111/joms.12877.

Berger, Grant Packard, Reihane Boghrati, Ming Hsu, Ashlee Humphreys, Andrea
Luangrath, Sarah Moore, Gideon Nave, Christopher Olivola, Matthew Rocklage, (2022),
Wisdom from Words: Marketing Insights from Text Analysis, *Marketing Letters*, 1-13.

Confidential

Carpenter, Greg S. and Ashlee Humphreys, (2022) "If it's famous, it must be good: The social construction of brand value in the US wine market," The Routledge Handbook of Wine and Culture, 372-381.

Lamberton, Cait and Ashlee Humphreys, "Social Media: From Classic Psychological Theories to New Opportunities," *APA Handbook of Consumer Psychology*, 489-511.

Humphreys, Ashlee (2021), "The Textuality of Markets," *AMS Review* 11, no. 3: 304-315.

Gonsalves, Chahna, S Ludwig, K de Ruyter, A Humphreys, (2021) "Writing for impact in service research," *Journal of Service Research* 24 (4), 480-499.

Pamuksuz, Utku, Joseph T. Yun, A Humphreys, (2021) "A Brand-New Look at You: Predicting Brand Personality in Social Media Networks with Machine Learning," *Journal of Interactive Marketing*, 56 (1), 1-15.

Huff, Aimee, Ashlee Humphreys and Sarah Wilner, (2021), "The Politicization of Objects: Meaning and Materiality in the U.S. Cannabis Market," *Journal of Consumer Research*.

Humphreys, Ashlee, Mathew Isaac, and Becky Hui-Jen Wang, (2021), "Construal Matching in Online Search: Applying Text Analysis to Illuminate the Consumer Decision Journey," *Journal of Marketing Research 58 (6),* 1101-1119.

Debenedetti, A, D Philippe, D Chaney, A Humphreys (2021), "Maintaining Legitimacy in Contested Mature Markets through Discursive Strategies: The Case of Corporate Environmentalism in the French Automotive Industry," *Industrial Marketing Management* 92, 332-343.

Berger, Jonah, Ashlee Humphreys, Stephan Ludwig, Wendy Moe, and David Schweidel, (2020), "Uniting the tribes: Using Text for Marketing Insight," *Journal of Marketing, 84*(1), pp.1-25.

Corciolani, Matteo, Kent Grayson, and Ashlee Humphreys, (2020), "Do more experienced critics review differently?: How field-specific cultural capital influences the judgments of cultural intermediaries." *European Journal of Marketing* 54, no. 3 (2020): 478-510.

Carpenter, Gregory S. and Ashlee Humphreys (2019), "What the Wine Industry Understands About Connecting with Consumers," *Harvard Business Review*, March 5, 2019. https://hbr.org/2019/03/what-the-u-s-wine-industry-understands-about-connecting-with-customers.

Humphreys, Ashlee and Gregory S. Carpenter (2018), "Status Games: Market Driving

Confidential

Through Social Influence in the U.S. Wine Industry," *Journal of Marketing*, https://doi.org/10.1509/jm.16.0179.

Humphreys, Ashlee and Rebecca Jen-Hui Wang (2017), "Automated Text-Analysis for Consumer Research," *Journal of Consumer Research*, Volume 44, Issue 6, 1 April 2018, Pages 1274–1306.

Humphreys, Ashlee and Craig J. Thompson (2014), "Branding Disaster: Reestablishing Trust through the Ideological Containment of Systemic Risk Anxieties," *Journal of Consumer Research*, 44 (4) (lead article).

Humphreys, Ashlee (2014), "How is Sustainability Structured?: The Discursive Life of Environmentalism," *Journal of Macromarketing*, 34 (3).

Humphreys, Ashlee and Kathy LaTour (2013), "Framing the Game: Assessing the Impact of Cultural Representations on Consumer Perceptions of Legitimacy," *Journal of Consumer Research*, 40 (4).

Humphreys, Ashlee (2010), "Semiotic Structure and the Legitimation of Consumption Practices: The Case of Casino Gambling," *Journal of Consumer Research*, 37 (3), 490-510.

Humphreys, Ashlee (2010), "Megamarketing: The Creation of Markets as a Social Process," *Journal of Marketing*, 74 (2), 1-19 (lead article).

Humphreys, Ashlee and Kent Grayson (2008), "The Intersecting Roles of Consumer and Producer: A Critical Perspective on Co-Production, Co-Creation and Prosumption," *Sociology Compass*, 2, 1-18.

Humphreys, Ashlee (2006), "The Consumer as Foucauldian 'Object of Knowledge,'" *Social Science Computer Review*, 24 (3), 296-309.

CONTRIBUTION STATEMENT

My research concerns *how institutions shape consumer norms, values, and practices.* My contributions to consumer behavior come from using institutional theory and the method of automated text analysis to investigate market emergence. In "Semiotic Structure and the Legitimation of Consumption Practices: The Case of Casino Gambling," (*Journal of Consumer Research*, 2010), I investigate the cultural process by consumption practices are legitimated over time. Through text analysis of newspaper reporting, I show that a gradual change in the language used to discuss casino gambling paved the way for market emergence. This work won the Sidney J. Levy award for outstanding work in CCT in 2010. In "Megamarketing: Market Creation as a Social Process," published in the *Journal of Marketing* (2010), I complement this approach by applying these insights to understand megamarketing. This research was published as the lead article in the *Journal of Marketing* and was runner-up for the Harold H. Maynard Award for best article of the year.

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With Kathy LaTour, I extend this understanding to individual cognitive structures to understand how media framing shapes perceptions of legitimacy on an implicit, individual level (Humphreys and LaTour 2013). In "Branding Disaster: Reestablishing Trust through the Ideological Containment of Systemic Risk Anxieties," with Craig Thompson, we show how this process contains consumer anxieties about risk following a crisis, in a comparative analysis of the Exxon vs. BP oil spills (Humphreys and Thompson 2014) that innovates by adding visual content analysis. This article was selected as lead article in the *Journal of Consumer Research*.

My current work continues to investigate market emergence and change, but has expanded include the areas of social media and sustainability. I also continue to be a leader in the method of automated text analysis in consumer research by publishing and leading workshops and seminars for scholars in both consumer psychology and CCT.

BOOK CHAPTERS

Carpenter, Greg and Ashlee Humphreys (forthcoming), "If it's Famous, It Must Be Good; The Social Construction of Brand Value in the US Wine Market," *Routledge Handbook of Wine and Culture,* ed. Jennifer Smith-Maguire.

Humphreys, Ashlee (2019), "Consumer Behavior and E-Commerce," Handbook for Marketing Strategy, ed. Bodo Schlegelmilch and Russell Winer.

Humphreys Ashlee. (2019) "Automated Text Analysis" In *Handbook of Market Research*. Homburg C., Klarmann M., Vomberg A. (eds). New York, NY: Springer.

Humphreys, Ashlee (2017), "Social Media," Routledge Handbook of Consumer Behavior, Tina Lowrey and Michael Solomon eds.: London: Routledge.

Humphreys, Ashlee (2010), "Co-Producing Experiences," in *Medill on Media Engagement*, Edward Malthouse and Abe Peck, eds. New York: Pine Forge Press.

Humphreys, Ashlee (2009), "Stacking the Deck: Gambling in Film and the Legitimation of Casino Gambling," in *Explorations in Consumer Culture Theory*, John F. Sherry and Eileen Fischer, eds. New York: Routledge.

OTHER PUBLICATIONS

Carpenter, Gregory and Ashlee Humphreys, "What the Wine Industry Understands About Connecting with Consumers," *Harvard Business Review*, March 3, 2019, https://hbr.org/2019/03/what-the-u-s-wine-industry-understands-about-connecting-with-customers.

Humphreys, Ashlee and Mathew S. Isaac, "The Development of a Digital Satisfaction Scale (DSS) and Index (DSI) to Evaluate Consumers' Satisfaction with Their Online Experiences," Chicago, IL: Intent Lab. Available at: http://www.performics.com/about/digital-satisfaction-index/.

Confidential

Foerstner, Abigail, Ashlee Humphreys, and Ellen Shearer (2013), "Energizing Media Coverage of Energy Issues: The Impact of Different Reporting Frames on Audience Engagement and Understanding," Washington, DC: Lounsbery Foundation.

Humphreys, Ashlee (2012), "Megamarketing" in *Encyclopedia of Management*, Volume 9, Marketing, New York: Wiley.

Humphreys, Ashlee (2010), "Advertising," in *World Book Encyclopedia*. Chicago, IL: World Book.

WORKS IN PROGRESS

"Shifting the Shape: Strategic Shaping and the Symbolic Management of Risk," with Matteo Corciolani, Elisa Giuliani, Ashlee Humphreys, Dalli Daniele, and Annamaria Tuan (submitted the *Academy of Management Journal*)

Humphreys, Ashlee with Andrew Smith, "Professional Contests and the Institutionalization of Social Media" (2nd Round, *Journal of Marketing*)

Humphreys, Ashlee, "The Access/Ownership Distinction in Everyday Consumption Practices," (draft available).

Humphreys, Ashlee, "Do Brands Like Us? The Perceived Liking of the Brand for the Self and Brand Attraction" with Lora Harding (manuscript in preparation).

Humphreys, Ashlee and Mathew S Isaac, "Digital Satisfaction," (draft available).

REFEREED PROCEEDINGS

Huff, Aimee, Ashlee Humphreys and Sarah Wilner, (2018) "Markets and Meaning: The Role of Product Form in Legitimacy, the case of Marijuana," Advances in Consumer Research, Vol. 43.

Giuliani, Elisa, A Humphreys, D Dalli, A Tuan, M Corciolani (2018), "Strategic CSR Framing by Firms in Emerging Markets," *Academy of Management Proceedings* 2018 (1), 15922

Humphreys, Ashlee and Kathy LaTour (2011), "Together We Stand, Divided We Fall: Categorization and the Process of Legitimation," *Advances in Consumer Research*, Vol. 39, 172-176.

Harding, Lora and Ashlee Humphreys (2010), "Self-Brand Attraction: An Interpersonal Attraction Approach to Brand Relationships," *Advances in Consumer Research*, Vol. 37, 68-69.

Humphreys, Ashlee and Robert V. Kozinets (2009), "The Construction of Value in Attention Economies," *Advances in Consumer Research*, Vol. 36, 689.

Confidential

Humphreys, Ashlee (2009), "Legitimation and Semiotic Structure," *Advances in Consumer Research*, Vol. 36, 135-138.

Mick, David Glen and Ashlee Humphreys (2008), "Consumer Freedom from Consumer Culture Theory Perspectives," *Advances in Consumer Research - North American Conference Proceedings*, Vol. 35, 18-19.

Humphreys, Ashlee (2008), "Understanding Collaboration and Collective Production: New Insights on Consumer Co-Production," *Advances in Consumer Research*, Vol. 35, 63-66.

Humphreys, Ashlee and Markus Giesler (2007), "Access Versus Ownership in Consumer Research," *Advances in Consumer Research*, Vol. 34, 696-698.

ACADEMIC CONFERENCE PRESENTATIONS

"Markets and Meaning: The Role of Product Form in Legitimacy, the case of Marijuana," Austin, TX. October 2018.

"The Politicization of Objects," Consumer Culture Theory Conference, Odense, Denmark, July 2018.

"Professional Contests and the Institutionalization of Social Media," Baltimore, MD, October 2014.

"Wine Worlds," European Marketing Association Conference, Istanbul, Turkey, July 2013.

"Sustainability and Social Class," European Association of Consumer Research, Barcelona, Spain, June 2013.

"Oil Spills as Disaster Myths: Grotesque Realism in Postmodern Consumer Culture," Consumer Culture Theory Conference, Oxford University, August 2012.

"Consumer Culture Theory in Marketing Research," American Marketing Association Winter Educator's Conference, Las Vegas, NV, February 2011.

"The Discursive Life of Environmentalism," Consumer Culture Theory Conference, Evanston, IL, August 2011.

"Together We Stand, Divided We Fall: Categorization and the Process of Legitimation," Association for Consumer Research, St. Louis, MO, October 2010.

"Legitimacy and the Cultural Diffusion of Casino Gambling, 1976-2006," Association for Consumer Research, San Francisco, CA, October 2008.

Confidential

"Attention Economies and the Construction of Value: The Case of YouTube," with Robert V. Kozinets, Association for Consumer Research, San Francisco, CA, October 2008.

"Attention Economies and the Construction of Value: The Case of YouTube," with Robert V. Kozinets, International Communication Association, Montreal, Quebec, May 2008.

"Consumer Freedom from Consumer Culture Theory Perspectives," with David Mick, Association for Consumer Research, Memphis, TN, October 2007.

"Managing Co-production: The Case of Wikipedia," with Kent Grayson, Association for Consumer Research, Memphis, TN, October 2007.

"Philosophy and Consumption: Discussions on Trust and Brands," with Shona Bettany, Susan Dobscha, Marcus Giesler, Kent Grayson, Ashlee Humphreys, Krittinee Nuttavuthisit, Rob Kleine, Jonathan Schroeder, Alladi Venkatesh, Clara Gustafsson, Association for Consumer Research, Memphis, TN, October 2007.

"Stacking the Deck: Gambling in Film and the Legitimization of Casino Gambling," Consumer Culture Theory Conference, Toronto, ON, May 2007.

"The Access/Ownership Distinction in the Media Marketplace," with Markus Giesler, Association for Consumer Research, Orlando, FL, October 2006.

"The Access/Ownership Distinction in Consumer Behavior," Session Chair, Association for Consumer Research, Orlando, FL, October 2006.

"Commodity Fission," Circulations Conference, York University, March 2005.

INVITED TALKS

"Automated Text Analysis," 11th Triennial Invitational Choice Symposium, Cambridge, MD, May 2019.

"The Politicization of Objects," Pontifical Catholic University of Chile, April 2019.

"The Politicization of Objects," Guelph University, Guelph, ON, March 2019.

"Automated Text Analysis and Social Media," University of Manitoba, February 2019.

"The Emergence of Social Media as a Professional Field," MORS, Kellogg School of Management, September 2018, Northwestern University.

"Digital Satisfaction Index (DSI)," Marketing Science Institute Trustees Meeting,

Confidential

November 2016, San Francisco.

"Levels of Analysis and Matching Theory with Data," Association of Consumer Research Doctoral Consortium, October 2016, Berlin, Germany.

"The Discursive Life of Environmentalism...and what it means for Corporate Social Responsibility," University of Wyoming, Laramie, Wyoming, August 2016.

"Publishing Sociological Research in Marketing," Macromarketing Doctoral Consortium, July 2016, Dublin, Ireland.

"Professional Contests and the Emergence of Social Media as an Institutional Field," York University, Toronto, Canada, May 2016.

"The Emergence of Social Media as an Institutional Field," Kern Conference, April 2016, Rochester, NY.

"Professional Contests and the Emergence of Social Media as an Institutional Field," Concordia University, Montreal, Canada, March 2016.

"The Emergence of Social Media as an Institutional Field," SKEMA, Lille, France, December 2015.

"Market Creation as a Social Process," "Marketplace Mutations: New Perspectives on Consumer and Firm Behaviors that are Transforming the Market," Wilfred Laurier University, Waterloo, ON, May 2015.

"Writing the Book on Social Media: The Legitimation of Social Media as a Professional Field," 3rd Annual Digital Marketing Conference, Jinan University, Guangzhou, China, May 2015.

"Writing the Book on Social Media: The Legitimation of Social Media as a Professional Field," HEC Paris Marketing Camp, Paris, France, April 2015.

Automated Content Analysis in Marketing Research, Association of Consumer Research, Baltimore, MA, October 2014.

Consumption and Markets Workshop, "Oil Spills as Disaster Myths," University of California, Irvine, Irvine, CA, March 2014.

Qualitative Data Analysis Workshop, "Macro Approaches to Data Collection," Tucson, AZ, June 2013.

Kellogg Attitudes Motivation Processes Group (KAMP), "Framing the Game," Kellogg School of Management, Evanston, IL, April 2013.

Confidential

Thought Leaders in Services Management, "Consumer Perceptions of Service Constellations: Implications for Service Innovation," Nijmegen, Netherlands, June 2012.

Chicago Consumer Culture Community (C4), "Sustainability and Social Class," Chicago, IL, April 2012.

University of Arizona, "Wine Worlds," Tucson, Arizona, March 2012.

Association of Health Care Journalists, "Journalism and Social Media," Chicago, IL, September 2012.

University of Innsbruck, "Access as a Consumer Institution and Orientation," Innsbruck, Austria, May 2011.

Rochester Institute of Technology, "The Discursive Life of Environmentalism," Rochester, NY, April 2011.

University of Wisconsin, "The Discursive Life of Environmentalism," Madison, WI, March, 2011.

Queen's University, "Left out of the Green Revolution? Sustainability and Social Class in the United States," Kingston, Ontario, September 2010.

Chicago Consumer Culture Community (C4), "Words, Words, Words: The Use of Automated Content Analysis in Consumer Research," October 2009

Medill Board of Advisors Meeting, "Chip-less Cookies and Cream-less Oreos: Applying Attitudes Research to Understand Audience Interest," Evanston, IL. October 2009.

American Bar Association, "Social Networking 101," Chicago, IL. March, 2009.

TEACHING
KSM 461 Critical Thinking in Social, Digital, and Mobile Media (MBA), 2020-Present
IMC 466 Social Media (Master's Level), 2014-Present
IMC 401 Marketing Research (Master's Level), 2018
IMC 400 Consumer Insight (Master's Level), 2016
IMC 300/301 Consumer Insight, 2008-2018
IMC 466 Global Perspectives, 2012-2016
IMC 440 Summer Residency Projects, 2008-Present
IMC 455 Online Consumer Insight, Winter 2013
IMC 455 Consumer Insight (Master's Level), Fall 2014

ADVISING
Russel Nelson, University of Irvine, 2015 (Committee Member)
Lez Trujillo Torres, University of Illinois Chicago (Committee Member)
Alex Mitchell, Queens University (External Committee Member)

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SERVICE

Service to the Field

    Journal of Consumer Research, ERB
        Associate Editor, 2016-2018, 2020-Present
        Editorial Board, 2008-present
    Journal of Marketing, ERB
        Associate Editor, 2020-Present
        Editorial Board, 2018-Present
        Reviewer, 2010-Present
    Journal of Marketing Research
        Associate Editor (ad hoc), 2020-Present
        Reviewer, 2016-Present
    Journal of Business Research
        Guest Editor, Fall 2019
    AMS Review, ERB
        Editorial Board, 2019-Present.
    Journal of Interactive Marketing, ERB
        Editorial Board, 2018-Present
    Journal of Consumer Culture
        Reviewer 2009-Present
    Consumption, Markets, and Culture
        Editorial Review Board 2010-Present
        Reviewer 2008-Present
    Marketing Theory
        Reviewer 2007-2009
    Sociological Forum
        Reviewer 2010
    American Behavioral Scientist
        Reviewer 2010-Present
    Association for Consumer Research Conference
        Reviewer 2008-2010
        Program Committee 2011-Present
        Special Session Curator, 2013
    European Science Foundation
        Grant Reviewer 2010, 2012
    Chicago Consumer Culture Community
        Organizer 2010-Present
    Consumer Culture Theory Conference, Program Committee
        Reviewer 2008-2010
        Program Committee 2011-2013
Dissertation Committee Member, Russell Nelson, "Competitive Dynamics in New Markets: Measuring Innovation, Successful Strategies, and the Role of Social Media," University of Irvine, September 2013.

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Dissertation Committee Member, Lez Trujllo Torres, University of Illinois, Chicago, May 2019
Dissertation Committee Member, Alex Mitchell, Queens University, June 2018

Service to Northwestern

Chapin Fellow, Chapin Humanities Residential College 2012-2017
Senior Thesis Advisor
    Stanley Polit, School of Education and Social Policy, 2010
    Ashley Heyer, School of Education and Social Policy, 2010

Service to Medill

MSIMC Curriculum Committee
    2008-Present
Strategic Planning Committee
    2019
Committee to Evaluate Procedures for Promotion
    2019
MSJ Curriculum Committee
    2008-2011
IMC Undergraduate Curriculum Committee
    2008-2012
IMC Faculty Search Committee
    2000-2010
Digital Magazine Search Committee
    2011-2012
Medill Matters Co-Editor
    2010-2012

SHORT BIO

Ashlee Humphreys is Associate Professor at the Medill School of Journalism, Media, and Integrated Marketing Communications, Northwestern University. Her research uses a sociological perspective to examine core topics in marketing management and consumer behavior and has been published in *Journal of Marketing*, *Journal of Consumer Research*, *Journal of Marketing Research* and *Sociology Compass*. Professor Humphreys has been elected both an MSI Scholar (2020) and MSI Young Scholar (2015) and has won the Sidney J. Levy award for best research from a dissertation in CCT. She received her PhD in Marketing from Kellogg School of Management at Northwestern University in 2008. Her current research interests include the role of institutions in markets, processes of co-production, and the development of online communities, and she serves as an Associate Editor at the *Journal of Marketing* and the *Journal of Consumer Research*.

MEMBERSHIPS

Association for Consumer Research

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American Marketing Association
American Sociological Association

HONORS AND AWARDS
MSI Scholar, 2020

MSI Young Scholar, 2015

ASG Faculty Honor Roll, Northwestern University, Evanston, IL, 2012.

Harold H. Maynard Award, Runner-up, *Journal of Marketing*, American Marketing Association, 2010.

Sidney J. Levy Award, Consumer Culture Theory Conference, 2010.

PRESS COVERAGE
"Winemakers Tell Us What We Want," *The Australian*, April 16, 2019.

"It Takes Status To Succeed In The U.S. Wine Business, Says Two Academic Researchers," Thomas Pellechia, *Forbes,* March 9, 2019. https://www.forbes.com/sites/thomaspellechia/2019/03/09/it-takes-status-to-succeed-in-the-u-s-wine-business-says-two-academic-researchers/.

"A Retail Dilemma: Consumers Believe In Pictures As Digital Trust Declines," Laura Heller, *Forbes*, 21, 2019. https://www.forbes.com/sites/lauraheller/2019/02/21/a-retail-dilemma-consumers-believe-in-pictures-as-digital-trust-declines.

"How What You Say Reveals More Than You Think," *Knowledge@Wharton*, February 16, 2018. https://knowledge.wharton.upenn.edu/article/say-reveals-think/.

"Contractor BP Wants You to Think the Gulf Is OK," Jason Plautz, *National Journal*, April 20, 2015.

"Media coverage creates oil spill amnesia — so don't read this!," *Grist*, http://grist.org/list/media-coverage-creates-oil-spill-amnesia-so-dont-read-this/.

"Place Your Bets," Merrill Perlman, *Columbia Journalism Review*, September 30, 2013.

"Gaming versus Gambling," Michael Finney*, Consumer Talk*, KGO 810, Saturday 21, 2013.

"Why are consumers more likely to participate in online gaming than gambling?" *e! Science News*, September 10, 2013.

"Medill Energy Report Sparks Debate," Mike Smith, Huffington Post, April 29, 2013.

Confidential

"Chicago Chapter Learns about Social media for Working Journalists," Pia Christensen, *Health Journalism*, Association of Health Care Journalists, September 27, 2012.

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APPENDIX B – LAST FOUR YEARS' TESTIMONY

Fenner, et al. v. General Motors LLC, Robert Bosch GmbH, Robert Bosch LLC, Case No. 1:17-cv-11661-TLL-PTM, District Court for the Eastern District of Michigan

E Jean Carroll vs. Donald J. Trump, Case No. 1:22-cv-10016 District Court for the Southern District of New York

E Jean Carroll vs. Donald J. Trump (in his personal capacity), No. 1:20-cv-7311, District Court for the Southern District of New York

Ruby Freeman and Wandrea Moss vs. Rudoph W. Giuliani, No. 1:21-cv-03354, District Court for the District of Columbia

GR Opco, LLC v. Eleven IP Holdings LLC, et al., Case No. 1:22-cv-24119, District Court for the Southern District of Florida

Apple Inc., v. Zerodensity Yazilim Anonim Sirketi, Case No. 1:24-cv-00284, District Court for the Eastern District of Virginia

Mark Andrews, v. Dinesh D'Souza, True the Vote, Inc., Catherine Engelbrecht, Gregg Phillips, D'Souza Media LLC, Salem Media Group, Inc., Regnery Publishing, Inc., and John Does, No.: 1:22-cv-04259-SDG, District Court for the Northern District of Georgia, Atlanta Division

Beast Investments, LLC, v. Celebrity Virtual Dining, LLC, Virtual Concepts Holdings, Inc., and Virtual Dining Concepts, LLC, No.:653908/2023, Supreme Court of the State of New York, County of New York

Kai Spears, v. The New York Times Company, No.: 7:23-cv-000692-LSC, Northern District of Alabama, Western Division

Rachel Delocache Williams v. Netflix, Inc., CA 22-1132-CFC-EGT, District Court for the District of Delaware

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APPENDIX C – MATERIALS CONSIDERED

Legal Filings and Depositions
- Deposition Transcript of Alexandria Saks, September 24, 2025
- Deposition Transcript of Andrea Giannetti, September 23, 2025
- Deposition Transcript of Andrew Chrisomalis, September 24, 2025
- Deposition Transcript of Ashley Soevyn, October 3, 2025
- Deposition Transcript of Blake Lively, July 31, 2025
- Deposition Transcript of Breanna Koslow, September 9, 2025
- Deposition Transcript of Danny Greenberg, September 19, 2025
- Deposition Transcript of Elizabeth Talbot, August 21, 2025
- Deposition Transcript of Family Hive LLC, September 29, 2025
- Deposition Transcript of Gordon Duren, September 23, 2025
- Deposition Transcript of Isabela Ferrer, September 30, 2025
- Deposition Transcript of Jamey Heath, October 8, 2025
- Deposition Transcript of Jamey Heath, October 9, 2025
- Deposition Transcript of Jed Wallace, October 9, 2025
- Deposition Transcript of Jed Wallace, October 10, 2025
- Deposition Transcript of Jennifer Abel, September 25, 2025
- Deposition Transcript of Jennifer Abel, September 26, 2025
- Deposition Transcript of Jenny Slate, September 26, 2025
- Deposition Transcript of Josh Greenstein, September 30, 2025
- Deposition Transcript of Justin Baldoni, October 6, 2025
- Deposition Transcript of Justin Baldoni, October 7, 2025
- Deposition Transcript of Justine Harris, September 30, 2025
- Deposition Transcript of Katherine Case, September 5, 2025
- Deposition Transcript of Kevin Alexander, September 29, 2025
- Deposition Transcript of Leslie Sloane, September 26, 2025
- Deposition Transcript of Margaret Colleen Hoover, September 29, 2025
- Deposition Transcript of Melissa Nathan, September 29, 2025
- Deposition Transcript of Shelley Anne Carroll, September 25, 2025
- Deposition Transcript of Stephanie Jones, September 16, 2025
- Deposition Transcript of Steve Sarowitz, October 3, 2025
- Deposition Transcript of Tera Hanks, September 8, 2025
- Deposition Transcript of Vivian Baker, September 12, 2025
- Deposition Transcript of Warren Zavala, September 18, 2025
- Expert Report of Dina Mayzlin, October 17, 2025
- Lively v. Wayfarer, et al., 24-cv-10049 (S.D.N.Y.), Dkt. 546–47
- Lively v. Wayfarer, et al., 24-cv-10049, Second Amended Complaint

Bates Stamped Documents
- BBKOSLOW-000008194
- BBKOSLOW-000006800

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- KCASE-000002821
- KCASE-000003354
- KCASE-000001079/BBKOSLOW-000002985
- NATHAN_000003433
- SAROWITZ_000001020
- SAROWITZ_000001253

Academic Articles

- Albarracin, D., and Shavitt, S. (2018). "Attitudes and attitude change." *Annual Review of Psychology*, 69, 299–327
- Allport, G. W., & Postman, L. (1946). "An analysis of rumor." *Public opinion quarterly*, 10(4), 501-517
- Ardia, David S. (2010). "Reputation in a Networked World: Revisiting the Social Foundations of Defamation Law." *Harvard Civil Rights-Civil Liberties Law Review*, 45(2), 261-328
- Austin, L., Fisher Liu, B., & Jin, Y. (2012). "How Audiences Seek Out Crisis Information: Exploring the Social-Mediated Crisis Communication Model." *Journal of Applied Communication Research*, 40(2), 188–207
- Baym, N. K., & Boyd, D. (2012). "Socially Mediated Publicness: An Introduction." *Journal of Broadcasting & Electronic Media,* 56(3), 320–329
- Beersma, Bianca; Van Kleef, Gerben A (2012). "Why People Gossip: An Empirical Analysis of Social Motives, Antecedents, and Consequences." *Journal of Applied Social Psychology*, 42(11), 2640-2670
- Benford, R. D. & Snow, D. A. (2000). "Framing processes and social movements: An overview and assessment." *Annual review of sociology*, 26(1), 611-639
- Bitektine, A. (2011). "Toward a theory of social judgments of organizations: The case of legitimacy, reputation, and status." *Academy of management review*, 36(1), 151-179
- Borchers, N. S. (2019). "Social media influencers in strategic communication," *International Journal of Strategic Communication*, 13(4), 255-260
- Bourdieu, P., & Wacquant, L. (2013). "Symbolic capital and social classes." *Journal of Classical Sociology*, 13(2), 292-302
- Bowles, H. R., Babcock, L., & Lai, L. (2007). "Social incentives for gender differences in the propensity to initiate negotiations: Sometimes it does hurt to ask." *Organizational Behavior and Human Decision Processes*, 103(1), 84–103
- Brescoll, V. L. (2011). "Who takes the floor and why: Gender, power, and volubility in organizations." *Administrative Science Quarterly*, 56(4), 622–641
- Brescoll, V. L., & Uhlmann, E. L. (2008). "Can an angry woman get ahead? Status conferral, gender, and expression of emotion in the workplace." *Psychological Science*, 19(3), 268–275
- Brooks, Gillian, Jenna Drenten, and Mikolaj Jan Piskorski (2021). "Influencer Celebrification: How Social Media Influencers Acquire Celebrity Capital." *Journal of Advertising*, 50(5), 528-47
- Buchanan, T. & Benson, V., (2019). "Spreading Disinformation on Facebook: Do Trust in Message Source, Risk Propensity, or Personality Affect the Organic Reach of 'Fake News'?" *Social Media and Society*, 1-9

Confidential

- Bumsoo Kim, Han Lin, Yonghwan Kim, (2024). "Interplay of agenda setters in the digital age: The associative issue network between news organizations and political YouTube channels." *Computers in Human Behavior*, Volume 155
- Cacioppo, John T and Richard E Petty (1980). "Persuasiveness of Communications Is Affected by Exposure Frequency and Message Quality: A Theoretical and Empirical Analysis of Persisting Attitude Change," *Current issues and research in advertising*, 3 (1), 97-122
- Centola, Damon Joshua Becker, Devon Brackbill, and Andrea Baronchelli (2018). "Experimental evidence for tipping points in social convention." *Science*, 360(6393), 1116-1119
- Cialdini R. B., R. E. Petty, J. T. Cacioppo. (1981). "Attitude and Attitude Change." *Annual Review of Psychology*, 32, 357-404
- Cialdini, Robert B, Demaine, Linda J, Sagarin, Brad J, et. al (2006). "Managing social norms for persuasive impact." *Social Influence*, Vol. 1
- Conover, Michael, Jacob Ratkiewicz, Matthew Francisco, Bruno Gonçalves, Filippo Menczer, and Alessandro Flammini (2011). "Political polarization on Twitter." In *Proceedings of the International AAAI Conference on Web and Social Media*, 5(1), 89-96
- Curran, J., Shanto I., Lund, A.B., and Salovaara-Moring, I. (2009). "Media System, Public Knowledge and Democracy: A Comparative Study." *European Journal of Communication,* 24(1): 5-26
- Damon Centola, Joshua Becker, Devon Brackbill, and Andrea Baronchelli (2018). "Experimental evidence for tipping points in social convention." *Science*, 360(6393), 1116-1119
- Dewenter, Ralf, Melissa Linder, and Tobias Thomas (2019). "Can Media Drive the Electorate? The Impact of Media Coverage on Voting Intentions," *European Journal of Political Economy*, 58, 245-61
- Eagly, A. H., & Karau, S. J. (2002). "Role congruity theory of prejudice toward female leaders." *Psychological Review*, 109(3), 573–598
- Elsbach, K. D. (1994). "Managing organizational legitimacy in the California cattle industry: The construction and effectiveness of verbal accounts." *Administrative Science Quarterly*, 57-88
- Emile Jeuken, Bianca Beersma, Femke S. ten Velden, and Maria T. M. Dijkstra, (2015). "Aggression as Motive for Gossip During Conflict: The Role of Power, Social Value Orientatio, and Counterpart's Behavior," *Negotiation and Conflict Management Research*, 8(3), 137-152
- Fazio, L. K., Brashier, N. M., Payne, B. K., & Marsh, E. J. (2015). "Knowledge does not protect against illusory truth," *Journal of Experimental Psychology: General*, 144: 993-1002
- Feinberg, M., Willer, R., Stellar, J., Keltner, D. (2012). "The Virtues of Gossip: Reputational Information Sharing as Prosocial Behavior." *Journal of Personality and Social Psychology*, 102(5): 1015-30
- Ferree, M. M., & Merrill, D. A. (2000). "Hot movements, cold cognition: Thinking about social movements in gendered frames." *Contemporary Sociology*, 29(3), 454-462

Confidential

- Foos, F., & Bischof, D. (2022). "Tabloid media campaigns and public opinion: Quasi-experimental evidence on Euroscepticism in England." *American Political Science Review*, 116(1), 19-37
- Fournier, S., & Eckhardt, G. M. (2019). "Putting the Person Back in Person-Brands: Understanding and Managing the Two-Bodied Brand." *Journal of Marketing Research*, 56(4), 602–619
- Gamson, W. A., & Modigliani, A. (1989). "Media discourse and public opinion on nuclear power: A constructionist approach." *American journal of sociology*, 95(1), 1-37
- Garrett, R. K. (2009). "Echo chambers online?: Politically motivated selective exposure among Internet news users." *Journal of computer-mediated communication*, 14(2), 265-285
- Gensch, Dennis and Paul Shaman (1980). "Models of Competitive Television Ratings." *Journal of Marketing Research*, 17 (3), 307-15
- Gibbons, S. (2022). "Gender on the agenda: Media framing of women and women of color in the 2020 U.S. presidential election." *Newspaper Research Journal*, 43(1), 102-128
- Hallahan, Kirk & Holtzhausen, Derina & Ruler, Betteke & Verčič, Dejan & Sriramesh, Krishnamurthy (2007). "Defining Strategic Communication." *International Journal of Strategic Communication,* 1. 3-35.
- Heider, Fritz (1946), "Attitudes and Cognitive Organization." *The Journal of Psychology*, 21 (1), 107-12
- Housholder, Elizabeth & Lamarre, Heather (2014). "Facebook Politics: Toward a Process Model for Achieving Political Source Credibility Through Social Media." *Journal of Information Technology & Politics*, 11. 368-382.
- Hovland, Carl I., and Walter Weiss (1951). "The influence of source credibility on communication effectiveness." *Public opinion quarterly*, 15(4): 635-650
- Huang, J., et al. (2021). "Large-scale quantitative evidence of media impact on public opinion toward China." *Humanities and Social Sciences Communications*, 8(1): 1-8
- Huff, A. D., Humphreys, A. & Wilner, S. J. (2021), "The politicization of objects: Meaning and materiality in the U.S. cannabis market." *Journal of Consumer Research*, 48(1), 22-50
- Hummon, Norman P and Patrick Doreian (2003). "Some Dynamics of Social Balance Processes: Bringing Heider Back into Balance Theory." *Social networks*, 25(1), 17-49
- Humphreys, A. & Latour, K. A. (2013). "Framing the game: Assessing the impact of cultural representations on consumer perceptions of legitimacy." *Journal of Consumer Research*, 40(4), 773-795
- Humphreys, Ashlee (2010). "Megamarketing: The Creation of Markets as a Social Process." *Journal of Marketing*, 74 (2), 1-19 (lead article)
- Humphreys, Ashlee and Rebecca Jen-Hui Wang (2018), "Automated text analysis for consumer research." *Journal of Consumer Research*, 44(6): 1274–1306
- Israeli, Ayelet, Jill Avery, and Leonard A. Schlesinger (2024). "The Meteoric Rise of Skims." *Harvard Business School Teaching Note*, 524-067.
- Keller, K.L. (1993). "Conceptualizing, Measuring, and Managing Customer-Based Brand Equity." *Journal of Marketing*, 57:1, 1-22

Confidential

- Kennedy, J. A., McDonnell, M.-H., & Stephens, N. (2016). "Does gender raise the ethical bar? Exploring the punishment of ethical violations at work." *Working paper on SSRN*
- Kotler, P. (1986). "Global standardization—courting danger." *Journal of Consumer Marketing*, 3(2), 13-15
- Kruglanski, A. W., and Gigerenzer, G. (2011). "Intuitive and deliberate judgments are based on common principles": Correction to Kruglanski and Gigerenzer (2011). *Psychological Review*, 118(3), 522–522
- Kunda, Z. (1990). "The case for motivated reasoning." *Psychological bulletin*, 108(3)
- Lacassagne, D., Béna, J., & Corneille, O. (2022). "Is Earth a perfect square? Repetition increases the perceived truth of highly implausible statements," *Cognition*, 223: 105052
- Langlois, G., & Slane, A. (2017) "Economies of reputation: the case of revenge porn." *Communication and Critical/Cultural Studies,* 14(2): 120–138
- Lee J, Kralik JD, Kwon J, Jeong J (2022). "How 'who someone is' and 'what they did' influences gossiping about them." *PLOS ONE* 17(7): e0269812.
- Liu, Shixi, Cuiqing Jiang, Zhangxi Lin, Yong Ding, Rui Duan, and Zhicai Xu (2015). "Identifying Effective Influencers Based on Trust for Electronic Word-of-Mouth Marketing: A Domain-Aware Approach," *Information Sciences*, 306, 34-52
- Luedicke, Marius K, Craig J Thompson, and Markus Giesler (2010). "Consumer Identity Work as Moral Protagonism: How Myth and Ideology Animate a Brand-Mediated Moral Conflict." *Journal of consumer research*, 36 (6)
- Maciel, A. F., & Fischer, E. (2020). "Collaborative market driving: How peer firms can develop markets through collective action." *Journal of Marketing*, 84(5), 41-59
- McCombs, Maxwell E., and Donald L. Shaw (1972). "The Agenda-Setting Function of Mass Media," *Public Opinion Quarterly*, 36(2), 176–187
- McCombs, Maxwell E., and Donald L. Shaw (1993). "The evolution of agenda-setting research: Twenty-five years in the marketplace of ideas." *Journal of communication*, 43(2), 58-67
- McCracken, G. (1986). "Culture and consumption: A theoretical account of the structure and movement of the cultural meaning of consumer goods." *Journal of Consumer Research*, 13(1), 71–84
- Messner, Marcus and Marcia Watson Distaso (2008). "The Source Cycle: How Traditional Media and Weblogs Use Each Other as Sources." *Journalism Studies*, 9(3), 447-63
- Metzger, M. J., and Flanagin, A. J. (2013). "Credibility and trust of information in online environments: The use of cognitive heuristics." *Journal of Pragmatics*, 59, 210–220
- Metzger, Miriam J., Andrew J. Flanagin, & Ryan B. Medders (2010). "Social and Heuristic Approaches to Credibility Evaluation Online." *Journal of Communication*, 60(3), 413–439
- Meyers-Levy, J., & Malaviya, P. (1999). "Consumers' Processing of Persuasive Advertisements: An Integrative Framework of Persuasion Theories." *Journal of Marketing*, 63(4_suppl1), 45-60.
- Moscovici, Serge, Bernard Personnaz (1980). "Studies in social influence: V. Minority influence and conversion behavior in a perceptual task." *Journal of Experimental Social Psychology*, 16(3), 270-282

Confidential

- Olson, J.M. and Zanna, M.P. (1993). "Attitudes and attitude change." *Annual review of psychology*, 44(1), 117-154
- Parmentier, Marie-Agnès and Eileen Fischer (2021). "Working It: Managing Professional Brands in Prestigious Posts." *Journal of Marketing*, 85 (2), 110-28
- Parmentier, Marie-Agnès, and Eileen Fischer (2012). "How athletes build their brands." *International Journal of Sport Management and Marketing*, 11(1-2), 106-24
- Parmentier, Marie-Agnès, Eileen Fischer, and A Rebecca Reuber (2013). "Positioning Person Brands in Established Organizational Fields," *Journal of the Academy of Marketing Science*, 41(3), 373-87
- Payne, E. M., Peltier, J. W., & Barger, V. A. (2017). "Omni-channel marketing, integrated marketing communications and consumer engagement: A research agenda." *Journal of Research in Interactive Marketing*, 11(2), 185–197
- Petty, Richard E., Duane T. Wegener, and Leandre R. Fabrigar (1997). "Attitudes and attitude change." *Annual review of psychology*, 48(1), 609-647
- Pfeffer, J., Zorbach, T., and Carley, K.M. (2014). "Understanding Online Firestorms: Negative Word-of-Mouth Dynamics in Social Media Networks." *Journal of Marketing Communications*, 20 (1-2): 117-28
- Picard, Robert G (1988). "Measures of Concentration in the Daily Newspaper Industry." *Journal of Media Economics*, 1(1), 61-74
- Pornpitakpan, C. (2004). "The persuasiveness of source credibility: A critical review of five decades' evidence." *Journal of applied social psychology*, 34(2), 243-281
- Prior, Markus (2013). "Media and political polarization." *Annual Review of Political Science*, 16: 101-127
- Rohrbach, Tobias, Loes Aaldering, Daphne Joanna Van der Pas (2023). "Gender differences and similarities in news media effects on political candidate evaluations: a meta-analysis." *Journal of Communication*, 73(2), 101–112
- Ross, L., & Lepper, M. (1979). "Biased assimilation and attitude polarization: The effects of prior theories on subsequently considered evidence." *Journal of Personality and Social Psychology*, 37(11), 2098–2109
- Rudman, L. A., & Glick, P. (2002). "Prescriptive gender stereotypes and backlash toward agentic women." *Journal of Social Issues*, 57(4), 743–762
- Shankar, V., and Kushwaha, T. (2021). "Omnichannel Marketing: Are Cross-Channel Effects Symmetric?" *International Journal of Research in Marketing*, 38(2), 290-310
- Sharman, Jason C. (2007) "Rationalist and constructivist perspectives on reputation." *Political Studies*, 55(1), 20-37
- Skurnik, I., (2005). "Special Session Summary Rumors, Refutations, and Conflicts of Interest: Problems in Dealing With Unreliable Information." *Association for Consumer Research*, 274-276
- Sterrett, David, Dan Malato, Jennifer Benz, Liz Kantor, Trevor Tompson, Tom Rosenstiel, Jeff Sonderman, and Kevin Loker (2019). "Who Shared It?: Deciding What News to Trust on Social Media." *Digital Journalism*, 7(6), 783-801
- Taylor, S.E., (1991). "Asymmetrical Effects of Positive and Negative Events: The Mobilization-Minimization Hypothesis." *Psychological Bulletin*, 110(1): 67-85
- Thomson, M. (2006). "Human Brands: Investigating Antecedents to Consumers' Strong Attachments to Celebrities." *Journal of Marketing*, 70(3), 104–119

Confidential

- Thorson, Emily (2016). "Belief echoes: The persistent effects of corrected misinformation." *Political Communication,* 33(3), 460-480
- Traberg, Cecilie Steenbuch & Sander van der Linden (2022). "Birds of a feather are persuaded together: Perceived source credibility mediates the effect of political bias on misinformation susceptibility." *Personality and Individual Differences*, 185: 111269
- Turcotte, Jason, Chance York, Jacob Irving, Rosanne Scholl, & Raymond Pingree (2015). "News Recommendations from Social Media Opinion Leaders." *Journal of Computer-Mediated Communication*, 20(5), 520–535
- Tversky, Amos, and Daniel Kahneman (1974). "Judgment under Uncertainty: Heuristics and Biases: Biases in judgments reveal some heuristics of thinking under uncertainty." *Science,* 185(4157), 1124-1131.
- Tybout, A. M., Calder, B. J., & Sternthal, B. (1981). "Using information processing theory to design marketing strategies." *Journal of Marketing Research*, 18(1), 73–79
- Udry, White, & Barber (2022). "The effects of repetition spacing on the illusory truth effect," *Cognition,* 225(1):105157
- Üstüner, Tuba and Craig J. Thompson, (2012). "How Marketplace Performances Produce Interdependent Status Games and Contested Forms of Symbolic Capital." *Journal of Consumer Research*, 38 (5), 796 - 814
- Vosoughi, S., Roy, D., and Aral, S., (2018). "The spread of true and false news online." *Science*, 359, 1146-1151
- Wang, L., Ramachandran, A., & Chaintreau, A. (2016). "Measuring Click and Share Dynamics on Social Media: A Reproducible and Validated Approach." *Proceedings of the International AAAI Conference on Web and Social Media*, 10(2), 108-113
- Wang, Yuyan, Jeong-Nam Kim, & Bey-Ling Sha (2021). "When public relations meets social media: A systematic review…" *Public Relations Review*, 47(4), 102081
- Weiss, Robert Frank (1969). "Repetition of Persuasion." *Psychological Reports*, 25(2), 669-70
- Whitehead Jr, J. L. (1968). "Factors of source credibility," *Quarterly Journal of Speech*, 54(1), 59-63

Books
- Ajzen, I. (1985). "From intentions to actions: A theory of planned behavior." In J. Kuhl & J. Beckmann (Eds.), *Action control: From cognition to behavior*. Berlin, Heidelber, New York: Springer-Verlag
- Baym, N. K. (2015). *Personal connections in the digital age*. John Wiley & Sons
- Bourdieu, P. (1993) *The Field of Cultural Production: Essays on Art and Literature*. Columbia University Press, New York
- Bourdieu, P., & Wacquant, L. J. D. (1992). *An Invitation of Reflexive Sociology*. Chicago: University of Chicago
- Bourdieu, Pierre, Richardson, J. (1986) "The Forms of Capital." In *Handbook of Theory and Research for the Sociology of Education*, Westport, CT: Greenwood
- Boyd, D. (2010). "Social network sites as networked publics: Affordances, dynamics, and implications." In *Networked Self: Identity, Community, and Culture on Social Network Sites*, Routledge

Confidential

- Chadwick, A. (2017). *The Hybrid Media System: Politics and Power,* Oxford University Press
- Cialdini, Robert B (1987). *Influence: The Psychology of Persuasion, Vol. 3*: A. Michel Port Harcourt
- David, John (2016). *How to Protect (or Destroy) Your Reputation Online: The Essential Guide to Avoid Digital Damage, Lock Down Your Brand, and Defend Your Business*: Red Wheel/Weiser
- Dyer (1979). *Heavenly Bodies: Film Stars and Society*
- Gamson (1994). *Claims to Fame: Celebrity in Contemporary America*
- Gans, H.J. (2004). *Deciding What's News: A Study of CBS Evening News, NBC Nightly News, Newsweek, and Time*, Northwestern University Press
- Heider, Fritz (1958). *The psychology of interpersonal relations*, John Wiley & Sons Inc.
- Humphreys, A. (2015). *Social Media: Enduring Principles*, Oxford University Press
- Katz & Lazarsfeld (1955). *Personal Influence*, New York: Free Press
- Pariser, Eli (2011). *The Filter Bubble: What the Internet Is Hiding from You*, New York: Penguin Press.
- Rosnow, R.L. and Fine, G.A. (1976). *Rumor and Gossip: The Social Psychology of Hearsay*, Elsevier
- Tuchman, Gaye (1978). *Making News: A Study in the Construction of Reality*, New York: Free Press
- Weber, Max (1922/1978). *Economy and Society: An Outline of Interpretive Sociology, Vol. 2*, University of California press
- Wegener, Duane T., Natalie D. Smoak, Richard E. Petty, and Leandre R. Fabrigar (2004). "Multiple routes to resisting attitude change." In *Resistance and persuasion*, Psychology Press

Websites
- https://agencyanalytics.com/kpi-definitions/cost-per-thousand-cpm
- https://apnews.com/article/blake-lively-justin-baldoni-harassment-complaint-10a90da60d7a325f33f3fa6bbf263e29
- https://archive.is/vpdEs
- https://archive.is/wEzm2
- https://archive.org/details/CNNW_20241223_140000_CNN_News_Central/start/3350/end/3410
- https://archive.org/details/CNNW_20241223_160000_CNN_Newsroom_With_Pamela_Brown/start/2594/end/2654
- https://archive.org/details/CNNW_20241223_180000_CNN_News_Central/start/2201/end/2261
- https://archive.org/details/CNNW_20241223_200000_CNN_News_Central/start/2838/end/2898
- https://archive.org/details/CNNW_20241223_210000_The_Lead_With_Jake_Tapper/start/3253/end/3313
- https://archive.org/details/CNNW_20241224_060000_The_Source_With_Kaitlan_Collins/start/2712/end/2772

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- https://archive.org/details/CNNW_20250204_040000_Laura_Coates_Live/start/3357/end/3417
- https://archive.org/details/FBC_20250306_160000_Varney__Company/start/1140/end/1200
- https://archive.org/details/FOXNEWSW_20250105_160000_MediaBuzz/start/3350/end/3410
- https://archive.org/details/FOXNEWSW_20250204_040000_Fox_News_at_Night/start/3120/end/3180
- https://archive.org/details/FOXNEWSW_20250208_000000_The_Ingraham_Angle/start/2760/end/2820
- https://archive.org/details/FOXNEWSW_20250316_220000_The_Big_Weekend_Show/start/2673/end/2733
- https://archive.org/details/KGO_20241224_050000_ABC_World_News_Tonight_With_David_Muir/start/1017/end/1077
- https://archive.org/details/KGO_20241224_083700_Nightline/start/323/end/383
- https://archive.org/details/KGO_20241224_150000_Good_Morning_America/start/2340/end/2400
- https://archive.org/details/KGO_20250201_083700_Nightline/start/600/end/660
- https://archive.org/details/KNTV_20241222_013000_NBC_Nightly_News_With_Lester_Holt/start/963/end/1023
- https://archive.org/details/KNTV_20241222_140000_Sunday_Today_With_Willie_Geist/start/664/end/724
- https://archive.org/details/KNTV_20241222_233000_NBC_Nightly_News_With_Lester_Holt/start/941/end/1001?q=baldoni+categorically+flse
- https://archive.org/details/KNTV_20241223_110000_Early_Today/start/860/end/920
- https://archive.org/details/KNTV_20241223_150000_Today/start/2065/end/2125
- https://archive.org/details/KNTV_20241223_200000_NBC_News_Daily/start/537/end/597
- https://archive.org/details/KNTV_20241224_150000_Today/start/2031/end/2091
- https://archive.org/details/KNTV_20250102_150000_Today/start/2540/end/2600
- https://archive.org/details/KNTV_20250104_130000_Today/start/1448/end/1508
- https://archive.org/details/KNTV_20250117_120000_Early_Today/start/1171/end/1231
- https://archive.org/details/KNTV_20250117_123000_Early_Today/start/1206/end/1266
- https://archive.org/details/KNTV_20250523_140000_Today/start/2040/end/2100
- https://archive.org/details/KPIX_20241223_113000_CBS_News_Mornings/start/988/end/1048
- https://archive.org/details/KQED_20241223_223000_BBC_News_America/start/978/end/1038
- https://archive.org/details/MSNBCW_20241223_110000_Morning_Joe/start/13069/end/13129
- https://archive.org/details/MSNBCW_20241223_150000_MSNBC_Reports/start/2479/end/2539
- https://archive.org/details/MSNBCW_20241223_190000_MSNBC_Reports/start/3284/end/3344

Confidential

- https://archive.org/details/MSNBCW_20241224_130000_Jonathan_Lemire_Reports/start/4843/end/4903
- https://archive.org/details/MSNBCW_20241224_150000_MSNBC_Reports/start/2167/end/2227
- https://archive.org/details/MSNBCW_20241224_190000_MSNBC_Reports/start/2029/end/2089
- https://archive.org/details/MSNBCW_20250102_110000_Morning_Joe/start/13961/end/14021
- https://archive.ph/6Xcts
- https://archive.ph/GRXgP
- https://archive.ph/wbYGw
- https://archive.ph/WHQwZ
- https://brandwatch-reviews-help.brandwatch.com/hc/en-us/articles/360020006658-Dashboards
- https://collider.com/it-ends-with-us-feud-blake-lively-justin-baldoni/
- https://consumer-research-help.brandwatch.com/hc/en-us/articles/360012098098-Query-Operators
- https://cxl.com/blog/advertorials/
- https://dailymail.co.uk/tvshowbiz/article-13755441/Blake-Lively-slur-transgender.html
- https://deadline.com/2025/01/blake-lively-justin-baldoni-lawyer-latest-1236260673/
- https://deadline.com/about-dhd/
- https://ew.com/amber-heard-blake-lively-justin-baldoni-johnny-depp-crisis-firm-8765866
- https://ew.com/blake-lively-accuses-justin-baldoni-sexual-harassment-retaliation-it-ends-with-us-8765519
- https://ew.com/blake-lively-sisterhood-of-the-traveling-pants-costars-offer-support-8765649
- https://ew.com/comedian-hannah-berner-clarifies-timing-of-netflix-blake-lively-joke-8767167
- https://fandomwire.com/primitive-war-2-director-reveals-robert-downey-jr-s-influence-that-sets-up-the-sequel/
- https://fortune.com/2018/08/10/ryan-reynolds-aviation-gin-owner/
- https://hbr.org/2015/07/comparing-the-roi-of-content-marketing-and-native-advertising
- https://hbr.org/2024/05/what-makes-a-successful-celebrity-brand
- https://help.x.com/en/resources/new-user-faq
- https://keynesdigital.com/ctv-advertising-rates/
- https://knowledge.wharton.upenn.edu/article/brand-rehab-how-companies-can-restore-a-tarnished-image/
- https://lftcllp.com/lawyers/bryan-j-freedman/
- https://macleans.ca/society/the-power-list-ryan-reynolds/
- https://manenough.com/
- https://manenough.com/man-enough-undefining-my-masculinity/
- https://martech.org/facebook-twitter-impressions/
- https://marxcommunications.com/what-does-impressions-mean-on-twitter/
- https://mediabiasfactcheck.com/deadline-hollywood/

Confidential

- https://mediabiasfactcheck.com/hollywood-reporter
- https://mediabiasfactcheck.com/new-york-times/
- https://newormedia.com/blog/cpm-benchmarks-by-the-industry/
- https://nypost.com/2005/08/02/past-perfect-oh-no-martha-ads-paint-her-as-lovable-screw-up/
- https://nypost.com/2024/08/14/entertainment/reporter-calls-out-blake-lively-for-uncomfortable-interview
- https://oaaa.org/wp-content/uploads/2022/10/2022_01-Solomons-US-Major-Media-CPM-ComparisonvOAAA.pdf
- https://open.spotify.com/episode/1HvHMVCkWxm9JIpPHZPfFC
- https://open.spotify.com/episode/1zICBvgHB2mAYltkCQ2lBP
- https://opentextbc.ca/mediastudies101/chapter/habermas-public-sphere/
- https://pagesix.com/2024/08/13/celebrity-news/blake-lively-approved-final-cut-of-it-ends-with-us-amid-feud/
- https://pagesix.com/2024/08/16/entertainment/justin-baldoni-felt-sidelined-by-blake-lively-on-it-ends-with-us-set-report
- https://pagesix.com/2024/08/16/parents/blake-lively-interviewer-reveals-infertility-after-bump-comment
- https://pagesix.com/2025/01/25/celebrity-news/justin-baldonis-lawyer-says-he-wont-be-bullied-into-silence-by-petrified-blake-lively-ryan-reynolds-after-gag-order-request/
- https://people.com/justin-baldoni-friction-making-it-ends-with-us-with-blake-lively-8693848
- https://people.com/justin-baldoni-sweden-trip-amid-friction-with-it-ends-with-us-cast-8694730
- https://people.com/justin-bieber-reacts-to-wife-hailey-bieber-nyc-billboard-11808995
- https://people.com/ryan-reynolds-reveals-he-s-ready-for-more-kids-with-blake-lively-the-more-the-merrier-8681574
- https://perezhilton.com/justin-baldoni-talks-challenge-working-with-complex-personalities-it-ends-with-us-amid-blake-lively-beef/
- https://podcasts.apple.com/gt/podcast/shame-on-blake-lively-the-new-york-times/id1754460914?i=1000683220818
- https://pracademy.co.uk/insights/public-relations-as-reputation-management/
- https://press.foxnews.com/2025/01/fox-news-delivers-highest-rated-january-in-cable-news-history-and-marks-23-years-at-number-one
- https://qz.com/t-mobile-acquires-mint-mobile-ryan-reynolds-roaming-1851449754
- https://socialmediablawg.blogs.pace.edu/2021/06/26/why-it-matters-lawyers-the-spread-of-misinformation-and-social-media/
- https://sproutsocial.com/features/premium-analytics/
- https://sproutsocial.com/insights/influencer-pricing/
- https://sproutsocial.com/insights/reach-vs-impressions/
- https://support.google.com/trends/answer/4355000?hl=en&sjid=8172751319134865217-NC
- https://support.google.com/trends/answer/4365533?hl=en
- https://theraveagency.com/blog/finding-the-value-in-twitter-impressions
- https://thetab.com/2024/08/01/blake-lively-ryan-reynolds-side-hustles

Confidential

- https://time.com/collection/time100-companies/5953581/hello-sunshine/
- https://today.yougov.com/about
- https://today.yougov.com/politics/articles/52272-trust-in-media-2025-which-news-sources-americans-use-and-trust
- https://today.yougov.com/topics/entertainment/explore/actor/Blake_Lively
- https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-blake-lively
- https://today.yougov.com/topics/entertainment/trackers/fame-and-popularity-megyn-kelly
- https://trends.google.com/trends/explore?date=2011-06-01%202011-07-01&q=%2Fm%2F06_bq1&hl=en-GB
- https://trends.google.com/trends/explore?date=2014-01-01%202024-01-01&q=%2Fm%2F06_bq1&hl=en-GB
- https://trends.google.com/trends/explore?date=2024-07-01%202024-07-31&geo=US&q=%2Fm%2F06_bq1&hl=en
- https://trends.google.com/trends/explore?date=2024-07-01%202024-07-31&q=bully&hl=en
- https://trends.google.com/trends/explore?date=2024-07-01%202024-08-05&q=tone%20deaf
- https://trends.google.com/trends/explore?date=2024-08-01%202024-08-31&q=%2Fm%2F06_bq1&hl=en
- https://trends.google.com/trends/explore?date=2024-08-01%202024-08-31&q=blake%20lively&hl=en
- https://trends.google.com/trends/explore?date=2024-08-01%202024-08-31&q=bully&hl=en
- https://trends.google.com/trends/explore?date=2024-08-06%202024-08-23&q=blake%20lively&hl=en
- https://trends.google.com/trends/explore?date=2024-08-06%202024-08-23&q=tone%20deaf
- https://trends.google.com/trends/explore?date=all&q=blake%20lively,%2Fm%2F06_bq1&hl=en
- https://trends.google.com/trends/explore?date=all&q=blake%20lively&hl=en
- https://trends.google.com/trends/explore?date=all&q=kjersti%20flaa&hl=en
- https://trends.google.com/trends/explore?date=all&q=parker%20posey&hl=en
- https://ustvdb.com/networks/abc/shows/good-morning-america/#google_vignette
- https://ustvdb.com/networks/abc/shows/nightline/
- https://ustvdb.com/networks/abc/shows/world-news-tonight-david-muir/#google_vignette
- https://ustvdb.com/networks/bbc/
- https://ustvdb.com/networks/cbs/shows/mornings/#google_vignette
- https://ustvdb.com/networks/cnn/shows/laura-coates-live/
- https://ustvdb.com/networks/cnn/shows/lead-jake-tapper/
- https://ustvdb.com/networks/cnn/shows/news-central/
- https://ustvdb.com/networks/cnn/shows/newsroom/#google_vignette
- https://ustvdb.com/networks/cnn/shows/source-kaitlan-collins/#google_vignette
- https://ustvdb.com/networks/fbn/shows/varney-co/
- https://ustvdb.com/networks/fox-news/shows/big-weekend/

Confidential

- https://ustvdb.com/networks/fox-news/shows/ingraham-angle/
- https://ustvdb.com/networks/fox-news/shows/night-trace-gallagher/
- https://ustvdb.com/networks/msnbc/shows/early-today/
- https://ustvdb.com/networks/msnbc/shows/morning-joe/#google_vignette
- https://ustvdb.com/networks/msnbc/shows/reports-live/#google_vignette
- https://ustvdb.com/networks/msnbc/shows/way-too-early-jonathan-lemire/#google_vignette
- https://ustvdb.com/networks/nbc/shows/news-daily/#google_vignette
- https://ustvdb.com/networks/nbc/shows/nightly-news-lester-holt/#google_vignette
- https://ustvdb.com/networks/nbc/shows/sunday-today-willie-geist/#google_vignette
- https://ustvdb.com/networks/nbc/shows/today/
- https://variety.com/2017/tv/news/justin-baldoni-talk-show-the-mens-room-1202488304/
- https://variety.com/2024/biz/news/jessica-alba-steps-down-the-honest-company-1235965784/
- https://variety.com/2024/film/news/it-ends-with-us-justin-baldoni-nonprofit-wayfarer-studios-no-more-1236107116/
- https://variety.com/2024/film/news/it-ends-with-us-sequel-in-doubt-blake-lively-justin-baldoni-feud-1236114099/
- https://web.archive.org/
- https://web.archive.org/web/20240302195841/https://help.instagram.com/1562166204102854
- https://web.archive.org/web/20241221161759/https://www.hollywoodreporter.com/
- https://web.archive.org/web/20241221172134/https://www.apnews.com/
- https://web.archive.org/web/20241222020047/https://www.eonline.com/
- https://web.archive.org/web/20241222031322/https://www.businessinsider.com/
- https://web.archive.org/web/20241222090254/https://www.businessinsider.com/
- https://web.archive.org/web/20241222111159/https://www.eonline.com/
- https://web.archive.org/web/20241222130138/https://ew.com/
- https://web.archive.org/web/20241222223637/https://www.businessinsider.com/
- https://web.archive.org/web/20241223002806/https://www.eonline.com/
- https://web.archive.org/web/20241223054823/https://ew.com/
- https://web.archive.org/web/20241223075819/https://www.dailymail.co.uk/home/index.html
- https://web.archive.org/web/20241223112425/https://www.dailymail.co.uk/home/index.html
- https://web.archive.org/web/20241223163929/https://www.eonline.com/ca
- https://web.archive.org/web/20241223183548/https://www.dailymail.co.uk/news/index.html
- https://web.archive.org/web/20241224020955/https://www.businessinsider.com/
- https://web.archive.org/web/20241224061846/https://ew.com/
- https://web.archive.org/web/20241225050106/https://www.eonline.com/
- https://web.archive.org/web/20241228101427/https://ew.com/
- https://web.archive.org/web/20250125230331/https://pagesix.com/
- https://web.archive.org/web/20250501073956/https://www.eonline.com/news/

Confidential

- https://www.architecturaldigest.com/story/inside-blake-lively-ryan-reynolds-real-estate-portfolio
- https://www.audible.com/podcast/Shame-on-Blake-Lively-The-New-York-Times/B0DSJX5SLP
- https://www.audible.com/podcast/Shame-on-Blake-Lively-The-New-York-Times/B0DSJX5SLP?srsltid=AfmBOop45gTTiLvFh_w-8r5fOTKTDsXLyBjSQUawJx0p_b720J3FId98
- https://www.boxofficemojo.com/release/rl3825501697/
- https://www.boxofficemojo.com/title/tt10655524/
- https://www.brandwatch.com/datanetworks/x/
- https://www.brandwatch.com/partnerships/reddit/
- https://www.britannica.com/biography/Blake-Lively
- https://www.businessinsider.com/blake-lively-lawsuit-against-justin-baldoni-5-bombshells-2024-12
- https://www.businessinsider.com/blake-lively-lawsuit-justin-baldoni-lawsuit-pr-law-experts-2024-12
- https://www.businessinsider.com/blake-lively-sues-it-ends-with-us-costar-justin-baldoni-2024-12
- https://www.businessinsider.com/colleen-hoover-backs-blake-lively-on-instagram-justin-baldoni-lawsuit-2024-12
- https://www.businessinsider.com/martha-stewart-career-timeline-model-empire-prison#in-2020-stewart-caused-an-online-frenzy-when-she-posted-a-poolside-thirst-trap-on-instagram-13
- https://www.buzzfeed.com/larryfitzmaurice/justin-baldoni-friction-making-it-ends-with-us
- https://www.buzzfeednews.com/article/stephaniesoteriou/rude-2016-blake-lively-interview-journalist-quit
- https://www.casamigos.com/en-us/our-story
- https://www.colleenhoover.com/products/it-ends-with-us
- https://www.dailymail.co.uk/femail/article-13723621/blake-lively-justin-baldoni-feud-drama.html
- https://www.dailymail.co.uk/femail/article-13742877/reporter-blake-lively-interview-quit-ends-feud.html
- https://www.dailymail.co.uk/femail/article-13761985/How-Blake-Livelys-fairytale-turned-PR-nightmare-Amid-growing-backlash-ALISON-BOSHOFF-reveals-went-wrong-Hollywoods-golden-girl.html
- https://www.dailymail.co.uk/news/article-14220065/Blake-Livelys-sister-breaks-silence-six-word-statement-Justin-Baldoni.html
- https://www.dailymail.co.uk/news/article-14220641/Justin-Baldoni-wedding-apology-Blake-Lively.html
- https://www.dailymail.co.uk/news/article-14221279/Justin-Baldoni-awkwardly-fumbles-way-Blake-Lively-questions-resurfaced-video.html
- https://www.dailymail.co.uk/reader-comments/p/comment/link/3746481439
- https://www.dailymail.co.uk/reader-comments/p/comment/link/3800924869
- https://www.dailymail.co.uk/reader-comments/p/comment/link/3802573881

Confidential

- https://www.dailymail.co.uk/reader-comments/p/comment/link/3803653917
- https://www.dailymail.co.uk/reader-comments/p/comment/link/3805230513
- https://www.dailymail.co.uk/reader-comments/p/comment/link/3814440361
- https://www.dailymail.co.uk/reader-comments/p/comment/link/3854375631
- https://www.dailymail.co.uk/reader-comments/p/comment/link/3855594039
- https://www.dailymail.co.uk/tvshowbiz/article-13727789/it-ends-blake-lively-justin-baldoni-feud.html
- https://www.dailymail.co.uk/tvshowbiz/article-13740163/justin-baldoni-friction-ends-feud-rumors-blake-lively.html
- https://www.dailymail.co.uk/tvshowbiz/article-13750525/blake-lively-taylor-swift-copied-friendship-justin-baldoni-drama.html
- https://www.dailymail.co.uk/tvshowbiz/article-13755441/Blake-Lively-slur-transgender.html
- https://www.dailymail.co.uk/tvshowbiz/article-1393181/Blake-Lively-nude-pics-Photos-100-fake-says-Gossip-Girl-star.html
- https://www.dailymail.co.uk/tvshowbiz/article-14221559/amber-heard-speaks-blake-lively-justin-baldoni-feud.html
- https://www.digitalspy.com/movies/a61873035/it-ends-with-us-justin-baldoni-friction/
- https://www.disboards.com/threads/can-we-trust-hollywood-reporter-and-its-sources-on-who-becomes-disney%E2%80%99s-next-ceo.3968554/
- https://www.ebsco.com/research-starters/computer-science/tiktok-media-app
- https://www.elle.com/uk/life-and-culture/culture/a61823800/justin-baldoni-interview/
- https://www.elle.com/uk/life-and-culture/culture/a61823800/justin-baldoni-interview/#r3z-addoor
- https://www.emarketer.com/content/digital-media-makes-up-nearly-two-thirds-of-consumers-total-time-spent-with-media
- https://www.eonline.com/news/1405962/justin-baldoni-details-working-with-complex-personalities-on-it-ends-with-us
- https://www.eonline.com/news/1411454/blake-lively-sues-justin-baldoni-for-sexual-harassment
- https://www.eonline.com/news/1411455/justin-baldoni-responds-to-blake-livelys-sexual-harassment-legal-complaint
- https://www.eonline.com/news/1411456/blake-livelys-legal-complaint-against-justin-baldoni-includes-alleged-texts-about-smear-campaign
- https://www.eonline.com/news/1411457/justin-baldoni-dropped-by-talent-agency-after-blake-livelys-sexual-harassment-complaint
- https://www.eonline.com/news/1411458/blake-livelys-complaint-against-justin-baldoni-mentions-hailey-bieber-leighton-meester-and-more
- https://www.eonline.com/news/1411460/blake-lively-gets-support-from-colleen-hoover-gwyneth-paltrow-and-more-amid-justin-baldoni-complaint
- https://www.eonline.com/news/1411476/blake-lively-says-justin-baldoni-secretly-sent-her-to-weight-loss-specialist-instead-of-throat-doctor
- https://www.eonline.com/news/1411490/blake-lively-says-her-ryan-reynolds-kids-were-traumatized-by-alleged-justin-baldoni-smear-campaign

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Confidential

- https://www.eonline.com/news/1411499/blake-livelys-it-ends-with-us-costar-brandon-skelnar-breaks-silence-on-justin-baldoni-allegations
- https://www.eonline.com/news/1411506/justin-baldoni-sued-by-former-publicist-days-after-blake-lively-complaint
- https://www.eonline.com/news/1412872/justin-baldoni-reveals-texts-from-ryan-reynolds-in-newly-launched-website
- https://www.eonline.com/news/1416837/blake-lively-and-anna-kendricks-friendship-history
- https://www.espn.com/soccer/story/_/id/44940499/how-ryan-reynolds-co-bought-wrexhams-path-promotion
- https://www.experian.com/blogs/marketing-forward/tv-measurement-2024/
- https://www.forbes.com/sites/conormurray/2024/08/14/why-fans-think-it-ends-with-us-stars-blake-lively-justin-baldoni-are-feuding-as-baldoni-reportedly-hires-crisis-pr/
- https://www.forbes.com/sites/jeffconway/2022/05/17/blake-lively-talks-betty-buzz-and-dominating-the-mixer-drink-industry/
- https://www.foxbusiness.com/lifestyle/blake-lively-sparkling-mixer-betty-buzz
- https://www.hollywoodreporter.com/business/business-news/entertainment-lawyer-bryan-freedman-hollywood-dark-knight-1235919993/
- https://www.hollywoodreporter.com/business/business-news/justin-baldoni-attorney-bryan-freedman-cant-lose-1236142321/
- https://www.hollywoodreporter.com/business/business-news/maximum-effort-marketing-ryan-reynolds-george-dewey-mntn-deal-1236155837/
- https://www.hollywoodreporter.com/movies/movie-news/blake-lively-sues-justin-baldoni-sexual-harassment-1236092214/
- https://www.hollywoodreporter.com/movies/movie-news/it-ends-with-us-biggest-box-office-since-star-is-born-1235996877/
- https://www.hollywoodreporter.com/movies/movie-news/justin-baldoni-hires-pr-crisis-manager-melissa-nathan-it-ends-with-us-1235973715/
- https://www.hootsuite.com/platform/analytics
- https://www.imdb.com/name/nm0000375/
- https://www.imdb.com/name/nm0515116/
- https://www.imdb.com/name/nm0515116/bio/
- https://www.imdb.com/name/nm1682573/bio/
- https://www.inc.com/graham-winfrey/justin-bieber-s-manager-on-the-secret-to-better-branding.html
- https://www.ispot.tv/brands/7PE/capital-one-banking
- https://www.justjared.com/2024/08/13/justin-baldoni-addresses-friction-on-it-ends-with-us-set/
- https://www.kohler.com/en/press-room/martha-stewart-cast-iron-ambassador-press-release
- https://www.lifeandstylemag.com/posts/justin-baldoni-on-friction-amid-it-ends-with-us-feud-rumors/
- https://www.marthastewart.com/martha-stewart-skechers-commercial-super-bowl-lix-8788822

Confidential

- https://www.marthastewart.com/martha-stewart-snoop-dogg-paris-olympics-2024-8690204
- https://www.megynkelly.com/2025/01/07/justin-baldoni-text-messages-with-it-ends-with-us-editors-about-blake-lively/
- https://www.megynkelly.com/watch/ep-1092-justin-baldonis-lawyer-says-he-wont-settle-with-blake-lively-and-what-comes-next-in-the-case/
- https://www.modash.io/blog/tiktok-pricing-guide
- https://www.modash.io/blog/youtube-influencer-pricing
- https://www.msi.org/articles/2020-msi-scholars-announced/
- https://www.nbcnews.com/id/wbna7038465
- https://www.newyorker.com/culture/critics-notebook/blake-lively-justin-baldoni-and-the-collapse-of-the-hollywood-metoo-era
- https://www.npr.org/2024/01/24/1225216895/bill-ackman-wall-street-harvard-dei-plagiarism-penn-college-free-speech
- https://www.nytimes.com/2004/03/06/business/martha-stewart-verdict-overview-stewart-found-guilty-lying-sale-stock.html
- https://www.nytimes.com/2008/04/20/movies/20carr.html
- https://www.nytimes.com/2023/04/25/business/media/carlson-lemon-lawyer-freedman.html
- https://www.nytimes.com/2024/08/11/business/media/it-ends-with-us-box-office.html
- https://www.nytimes.com/2024/12/21/business/media/blake-lively-justin-baldoni-it-ends-with-us.html
- https://www.nytimes.com/interactive/2024/12/21/us/statement-to-the-new-york-times.html
- https://www.oberlo.com/statistics/how-much-time-is-spent-with-different-forms-of-media
- https://www.pewresearch.org/fact-tank/2021/08/30/partisan-divides-in-media-trust-widen-driven-by-a-decline-among-republicans/
- https://www.pewresearch.org/journalism/2020/01/24/democrats-report-much-higher-levels-of-trust-in-a-number-of-news-sources-than-republicans/
- https://www.pewresearch.org/journalism/feature/news-media-tracker/
- https://www.pewresearch.org/politics/interactives/political-polarization-1994-2017/
- https://www.quintly.com/blog/twitter-impressions-and-reach-definition-and-how-to-track
- https://www.radiotimes.com/movies/it-ends-with-us-justin-baldoni-friction-newsupdate/
- https://www.rivaliq.com/
- https://www.rivaliq.com/blog/instagram-stories-benchmark-report/#title-methodology
- https://www.rivaliq.com/blog/instagram-stories-benchmark-report/#title-stories-reach-rate
- https://www.rivaliq.com/blog/tiktok-benchmark-report/#title-views-per-follower
- https://www.rivaliq.com/product/
- https://www.rottentomatoes.com/m/it_ends_with_us/cast-and-crew
- https://www.salon.com/2024/08/09/it-ends-with-us-controversy/
- https://www.scimagojr.com/journalrank.php?category=1406
- https://www.semrush.com/blog/analyzing-competitors-traffic/

Confidential

- https://www.semrush.com/blog/bounce-rate/
- https://www.semrush.com/company/
- https://www.sfgate.com/news/article/Time-well-spent-Martha-Stewart-leaves-prison-2694543.php
- https://www.socialinsider.io/social-media-benchmarks/instagram
- https://www.statista.com/topics/1536/media-use/
- https://www.ted.com/speakers/justin_baldoni
- https://www.thecut.com/article/it-ends-with-us-blake-lively-justin-baldoni-feud-rumors-explained.html
- https://www.thestreet.com/investing/bill-ackman-says-hes-spent-50-million-on-herbalife-battle-12780619
- https://www.tmz.com/2024/08/12/blake-lively-justin-baldoni-feud/
- https://www.today.com/popculture/movies/justin-baldoni-it-ends-with-us-interview-rcna165792
- https://www.tweetbinder.com/blog/twitter-impressions/
- https://www.unilad.com/film-and-tv/news/it-ends-with-us-justin-baldoni-speaks-out-blake-lively-785745-20240815
- https://www.usmagazine.com/entertainment/news/inside-blake-lively-and-justin-baldonis-it-ends-with-us-feud/
- https://www.vice.com/en/article/this-los-angeles-block-party-is-all-about-helping-the-homeless/
- https://www.wayfarerstudios.com/
- https://www.wayfarerstudios.com/#projects
- https://www.worldofreel.com/blog/2024/8/8/it-ends-with-us-director-fought-with-blake-lively-over-final-cut
- https://www.wsj.com/articles/prosecutors-interview-people-tied-to-ackman-in-probe-of-potential-herbalife-manipulation-1426196822
- https://www.yahoo.com/entertainment/ends-us-cast-drama-behind-174742487.html
- https://www.yahoo.com/entertainment/justin-baldoni-says-friction-while-212011241.html

Social Media
- http://tiktok.com/@metroentertainment/video/7403709890486684960
- http://twitter.com/bejeweledpaige/statuses/1880028973150924972
- http://twitter.com/Deltaco27/statuses/1823917952816583164
- http://twitter.com/imurmastermind/statuses/1874469561371906543
- http://twitter.com/LizCrokin/statuses/1824613700113686913
- http://twitter.com/mazemoore/statuses/1885947337350029426
- http://twitter.com/PerezHilton/statuses/1824239689517195631
- http://twitter.com/PerezHilton/statuses/1824632168028483736
- http://twitter.com/PerezHilton/statuses/1826468186176586157
- http://twitter.com/Shnowyyy/statuses/1823537881295561096
- http://twitter.com/The_Realnez/statuses/1874552901789692322
- http://twitter.com/TMZ/statuses/1824491494167724352

Confidential

- https://www.facebook.com/100093046995284/videos/megyn-kelly-slams-blake-lively-for-bullying-megynkellyshow-blakelively-ryanreyno/1847572355822851/
- https://www.facebook.com/17841401462773682/videos/917775630132577/
- https://www.facebook.com/951theriver/posts/justin-baldoni-responds-to-blake-livelys-sexual-harassment-lawsuit-claims-as-cat/1410061300335543
- https://www.facebook.com/accesshollywood/videos/1316310812717897/
- https://www.facebook.com/accesshollywood/videos/blake-lively-files-lawsuit-against-justin-baldoni-as-it-ends-with-us-director-su/1110127863711567/
- https://www.facebook.com/accesshollywood/videos/sisterhood-of-the-traveling-pants-stars-send-blake-lively-support-amid-justin-ba/1114947313112079/
- https://www.facebook.com/babedotnet/posts/his-lawyer-said-the-allegations-are-categorically-false/994293329407439/
- https://www.facebook.com/bbcnews/posts/according-to-a-legal-filing-lively-accused-mr-baldoni-and-his-team-of-attacking-/1052670260230299/
- https://www.facebook.com/bbcnews/posts/justin-baldonis-legal-team-told-the-bbc-the-allegations-are-categorically-false/1051643793666279/
- https://www.facebook.com/business/news/Coming-Soon-Video-Metrics
- https://www.facebook.com/CBSMornings/videos/blake-lively-accuses-it-ends-with-us-costar-of-sexual-harassment-in-complaint/1122133892687378/
- https://www.facebook.com/enews/videos/blake-lively-seen-for-first-time-in-over-a-month-amid-justin-baldoni-legal-battl/643375904712687/
- https://www.facebook.com/enews/videos/blake-livelys-attorneys-slam-more-attacks-from-justin-baldonis-legal-team/1003866415140342/
- https://www.facebook.com/enews/videos/is-it-ends-with-us-brandon-sklenar-team-blake-lively-or-team-justin-baldoni/1140894497508977/
- https://www.facebook.com/EntertainmentTonight/videos/inside-blake-livelys-lawsuit-against-co-star-justin-baldoni/1724818111632019/
- https://www.facebook.com/GoodMorningAmerica/videos/blake-lively-has-filed-a-complaint-accusing-her-costar-and-director-justin-baldo/1307622876924048/
- https://www.facebook.com/lawandcrime/videos/13-shocking-details-in-blake-livelys-sexual-harassment-complaint/566580773001444/
- https://www.facebook.com/MegynKelly/videos/new-video-and-details-emerge-showing-serial-fraudster-blake-livelys-past-actions/637699522314364/
- https://www.facebook.com/MegynKelly/videos/ryan-reynolds-and-blake-livelys-actions-and-why-they-will-get-sued-with-justin-b/8964328550324648/
- https://www.facebook.com/MegynKelly/videos/she-is-not-in-a-good-position-she-cares-about-her-reputation-and-i-am-sure-she-w/1610208279651887/
- https://www.facebook.com/mizhollywd/photos/blake-lively-has-accused-her-it-ends-with-us-director-and-co-star-justin-baldoni/1164169255434019/?_rdr
- https://www.facebook.com/officialbenshapiro/videos/blake-lively-continues-to-dig-herself-into-a-hole/2429529180712860/
- https://www.facebook.com/officialbenshapiro/videos/will-blake-lively-ever-recover-from-this-with-megyn-kelly/616566590861296/
- https://www.facebook.com/parademag/posts/a-lawyer-for-baldoni-called-livelys-accusations-categorically-false/95738783291298

- https://www.facebook.com/PerezHilton/videos/blake-lively-effed-up-against-me-mistake-in-her-nevada-response-perez-hilton/2974425092742061/
- https://www.facebook.com/photo.php?fbid=972430338090827&id=100059716081151&set=a.653248480009016
- https://www.facebook.com/photo/?fbid=1065061215649871&set=pcb.1065061338983192
- https://www.facebook.com/PopFactions/posts/justinbaldonis-lawyer-calls-blakelivelys-lawsuit-a-desperate-attempt-to-fix-her-/1324733421943030/
- https://www.facebook.com/reel/1084994890398387
- https://www.facebook.com/reel/1109563714137257
- https://www.facebook.com/reel/2280469348992243
- https://www.facebook.com/reel/586566113964776
- https://www.facebook.com/reel/609562528278138
- https://www.facebook.com/reel/766173042380609
- https://www.facebook.com/theh3podcast/videos/throwback-to-blake-livelys-really-bizarre-interviews-these-interviews-both-surfa/1086045373278470/
- https://www.facebook.com/ThePerezHilton/videos/-justinbaldoni-blakelively-ryanreynolds/1558849575517041/
- https://www.facebook.com/thewestaustralian/posts/justin-baldonis-lawyer-has-accused-blake-lively-of-making-categorically-false-ac/914056987500172/
- https://www.facebook.com/TMZ/videos/heather-mcdonald-thinks-ryan-reynolds-is-the-real-bully-in-justin-blake-drama/1335387677480499/
- https://www.facebook.com/watch/?v=1150132443311732
- https://www.facebook.com/watch/?v=1739253666856399
- https://www.facebook.com/watch/?v=2758485401028356
- https://www.facebook.com/watch/?v=311838885289032
- https://www.facebook.com/watch/?v=490346930291592
- https://www.facebook.com/watch/?v=534626182422209
- https://www.facebook.com/watch/?v=557839194016933
- https://www.facebook.com/watch/?v=633552612420383
- https://www.facebook.com/watch/?v=987930903413569
- https://www.facebook.com/wnbj39/videos/hollywood-is-shaken-as-blake-lively-accuses-co-star-justin-baldoni-of-sexual-har/1595015161116421/
- https://www.facebook.com/work180official/posts/in-a-statement-to-tmz-blake-lively-says-i-hope-that-my-legal-action-helps-pull-b/1168395585289579/
- https://www.instagram.com/alizalichtxo/reel/DD2waqBR4BP/
- https://www.instagram.com/allabouttrhpodcast/
- https://www.instagram.com/bbcnews/p/DD61A_gxrS3/
- https://www.instagram.com/bbcnews/reel/DD7hZFWs10o/
- https://www.instagram.com/cbsnews/p/DD3EmczyGkD/
- https://www.instagram.com/goodmorningamerica/reel/DECtMZ4ON0n/?locale=en
- https://www.instagram.com/hollywoodreporter/p/DD2CRC8zQ8J/?hl=en
- https://www.instagram.com/megynkellyshow/?hl=en
- https://www.instagram.com/megynkellyshow/reel/DN6aV3KkY3M/

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- https://www.instagram.com/mwnlifestyle/p/DD4Rt4QOxUv/
- https://www.instagram.com/nofilterwithzack/reel/DEa9URQSdSy/
- https://www.instagram.com/nofilterwithzack/reel/DEGdtReSORr/
- https://www.instagram.com/p/DD24C3STSG0/
- https://www.instagram.com/p/DD2CHc0Rw6o/
- https://www.instagram.com/p/DD2CRC8zQ8J/
- https://www.instagram.com/p/DD2dy4yJr7H/
- https://www.instagram.com/p/DD2KmDXs4gK/
- https://www.instagram.com/p/DD2M87iTWKs/
- https://www.instagram.com/p/DD2M87iTWKs/c/18084979354493811/
- https://www.instagram.com/p/DD2nkpdhvw8/
- https://www.instagram.com/p/DD2nu0hPo1u/
- https://www.instagram.com/p/DD2PtezBIF2/c/17886640788163876/
- https://www.instagram.com/p/DD2PtezBIF2/c/18051113095872791/
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- https://www.instagram.com/p/DD2vZe_vbNo/
- https://www.instagram.com/p/DD2vZe_vbNo/c/17920300242011126/
- https://www.instagram.com/p/DD2vZe_vbNo/c/18014339429474425/
- https://www.instagram.com/p/DD2vZe_vbNo/c/18027150743574421/
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- https://www.instagram.com/p/DD46s7PvBKK/
- https://www.instagram.com/p/DD5jy2WPri9/?hl=en
- https://www.instagram.com/p/DD5nbJ9Tyba/
- https://www.instagram.com/p/DD76aQ_MDjE/
- https://www.instagram.com/p/DD78rLfTpro/?img_index=2
- https://www.instagram.com/p/DD7QJ4RTZNn/
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- https://www.instagram.com/p/DD95UpjxLzz/
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- https://www.instagram.com/p/DD9VPtJoCuo/
- https://www.instagram.com/p/DDCqaz7Ip-J/c/18119350792439225/?hl=en
- https://www.instagram.com/p/DDfwLB2OJgq/c/17880532269215562/?hl=en
- https://www.instagram.com/p/DDfwLB2OJgq/c/17980814150731287/?hl=en
- https://www.instagram.com/p/DDfwLB2OJgq/c/18069826685316085/?hl=en
- https://www.instagram.com/p/DDfwLB2OJgq/c/18447597421078466/?hl=en
- https://www.instagram.com/p/DDpUVxGvnEG/?hl=en
- https://www.instagram.com/p/DDpUVxGvnEG/c/18058936285903182/?hl=en
- https://www.instagram.com/p/DDpUVxGvnEG/c/18287029318174729/?hl=en
- https://www.instagram.com/p/DDpUVxGvnEG/c/18477261565039673/?hl=en
- https://www.instagram.com/p/DE5UTTjMSwy/
- https://www.instagram.com/p/DED48-vS6SY/
- https://www.instagram.com/p/DEIOfgAt-hg/

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- https://www.instagram.com/p/DFlhDhYv4SY/
- https://www.instagram.com/p/DFqhOqZRc3z/c/17914058768983453/?hl=en
- https://www.instagram.com/p/DFRjWrLx7iN/?hl=en
- https://www.instagram.com/p/DFt0dZyxbQ1/c/17953903679778336/
- https://www.instagram.com/p/DGBF_YQRUQ-/?hl=en
- https://www.instagram.com/p/DGDye4Nxw62/?hl=en&img_index=1
- https://www.instagram.com/p/DI4jtndobKL/c/18032277179649516/
- https://www.instagram.com/p/DIgwz9BRRX7/
- https://www.instagram.com/p/DJ_8TOrgE4_/c/17967464909929287/?hl=en
- https://www.instagram.com/p/DJ_8TOrgE4_/c/17976229838865335/?hl=en
- https://www.instagram.com/p/DJ_8TOrgE4_/c/18018512330721096/?hl=en
- https://www.instagram.com/p/DJ_8TOrgE4_/c/18024765878518816/?hl=en
- https://www.instagram.com/p/DJ_8TOrgE4_/c/18051614162204708/?hl=en
- https://www.instagram.com/p/DJ_8TOrgE4_/c/18070952204019920/?hl=en
- https://www.instagram.com/p/DJ_8TOrgE4_/c/18083740603841004/?hl=en
- https://www.instagram.com/p/DJdFCbHp8mC/c/17953833248828006/?hl=en
- https://www.instagram.com/p/DJdFCbHp8mC/c/18029845604474870/?hl=en
- https://www.instagram.com/p/DJdFCbHp8mC/c/18081738502849267/?hl=en
- https://www.instagram.com/p/DJdFCbHp8mC/c/18083488114757421/?hl=en
- https://www.instagram.com/p/DJHtCaRCeB7/c/17893717377278459/?hl=en
- https://www.instagram.com/p/DJHtCaRCeB7/c/18096097213590433/?hl=en
- https://www.instagram.com/p/DJK8ubxS4Jt/c/17868518979332372/?hl=en
- https://www.instagram.com/p/DJK8ubxS4Jt/c/18085065289680545/?hl=en
- https://www.instagram.com/p/DJkrLNMzSFc/?img_index=8
- https://www.instagram.com/pedestriantv/p/DD3YGJIT-zx/
- https://www.instagram.com/prprinsessa/reels/
- https://www.instagram.com/realcandaceowens/?hl=en
- https://www.instagram.com/reel/C_Avus8p2lk/
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- https://www.instagram.com/reel/C-yCZvlP8MV/
- https://www.instagram.com/reel/DAfJcZOJVjE/
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- https://www.instagram.com/reel/DD2SmJ_x9o_/
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- https://www.instagram.com/reel/DD7bUNBu6lH/
- https://www.instagram.com/reel/DD9-2ZSO_-j/
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- https://www.instagram.com/reel/DFBnsy2OSLU/

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- https://www.instagram.com/thedailybeast/p/DD-FEB9zWMg/
- https://www.instagram.com/theperezhilton/?hl=en
- https://www.instagram.com/zoeunlimited/reels/
- https://www.reddit.com/r/DC_Cinematic/comments/bsnlev/discussion_what_are_the_most_reliable_and_least/
- https://www.reddit.com/r/ItEndsWithLawsuits/
- https://www.reddit.com/r/ItEndsWithLawsuits/comments/1klvijt/imo_a_number_of_blake_supporters_rally_around_her/
- https://www.reddit.com/r/ItEndsWithLawsuits/comments/1ksu678/hollywood_hairstylist_justin_anderson_and_kristen/
- https://www.reddit.com/r/movies/comments/hun828/what_website_do_you_recommend_to_follow_legit/
- https://www.reddit.com/r/teamjustinbaldoni/
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- https://www.reddit.com/r/teamjustinbaldoni/comments/1mm074w/your_free_speech_is_under_attack_by_ryan_reynolds/
- https://www.reddit.com/r/teamjustinbaldoni/comments/1mxrd91/blake_lively_is_the_bully_isnt_it_ironic_says_tter/
- https://www.threads.com/@sagesteele/post/DEiaZPeRV7s
- https://www.tiktok.com/@_camcamcan/video/7403387648561237290
- https://www.tiktok.com/@.filmch3rry/video/7405004854021688618
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- https://www.tiktok.com/@auntkaren0/video/7466957857645202719
- https://www.tiktok.com/@baconeggy_peggypew/video/7471002058288565547
- https://www.tiktok.com/@bbcnews/video/7451210617886657825
- https://www.tiktok.com/@bbcnews/video/7451985672899956001
- https://www.tiktok.com/@bbcsounds/video/7533911319473442070
- https://www.tiktok.com/@bbieberfever._jb/video/7406668647030197534
- https://www.tiktok.com/@bee.better.company
- https://www.tiktok.com/@bee.better.company/video/7462611161788239110
- https://www.tiktok.com/@brennasbakery/video/7403556333796085034
- https://www.tiktok.com/@brittanylylaofficial/video/7403111122385079594
- https://www.tiktok.com/@calabasaswings/video/7403089893598956832
- https://www.tiktok.com/@calabasaswings/video/7404224889642847520

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- https://www.tiktok.com/@candaceoshow
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- https://www.tiktok.com/@candaceoshow/video/7460684437638941982
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- https://www.tiktok.com/@catching.fun/video/7458278522742918446
- https://www.tiktok.com/@cbseveningnews/video/7451081663871782174
- https://www.tiktok.com/@cbsmornings/video/7451652879745551646
- https://www.tiktok.com/@cbsmornings/video/7452021745466248479
- https://www.tiktok.com/@cbsnews/photo/7451639491195850026
- https://www.tiktok.com/@clipcrzy4yt/video/7450879312267627822
- https://www.tiktok.com/@cloutchatmedia/video/7464499995375373601
- https://www.tiktok.com/@coffeewithcharlotte/video/7403541144635854123
- https://www.tiktok.com/@dailymail/video/7450903492358573358
- https://www.tiktok.com/@dailymail/video/7451645843662310702
- https://www.tiktok.com/@devotedly.yours/video/7403827171648654623
- https://www.tiktok.com/@devotedly.yours/video/7450891208806763806
- https://www.tiktok.com/@dibarazzi/video/7473214143823220010
- https://www.tiktok.com/@dr.zoe.shesacrowd/video/7403340193517915408
- https://www.tiktok.com/@emilycschwartz/video/7450875551658675487
- https://www.tiktok.com/@entertainmenttonight/video/7450885088042028318
- https://www.tiktok.com/@entertainmenttonight/video/7451359051604069662
- https://www.tiktok.com/@fanaticmedia_/video/7517289853252324630
- https://www.tiktok.com/@ginabear1981/video/7456679086539197738
- https://www.tiktok.com/@gma/video/7451599200367676718
- https://www.tiktok.com/@gma/video/7452703985708043566
- https://www.tiktok.com/@h3_podcast/video/7408264155339214112
- https://www.tiktok.com/@hazel.talks.gossip/video/7451540172518214942
- https://www.tiktok.com/@https_cyberkim/video/7454050759160712478
- https://www.tiktok.com/@independent_usa/video/7403438099532991774
- https://www.tiktok.com/@itsmissloulita/photo/7402006956111662369
- https://www.tiktok.com/@itsmissloulita/video/7404104841351400736
- https://www.tiktok.com/@itsmissloulita/video/7406409280225660193
- https://www.tiktok.com/@joysparkleshine/video/7451295307146759470
- https://www.tiktok.com/@joysparkleshine/video/7451347444484345131
- https://www.tiktok.com/@justbri_always/video/7403580304826420511
- https://www.tiktok.com/@justbri_always/video/7459171217090563370
- https://www.tiktok.com/@justplainzack/video/7457368476358036782
- https://www.tiktok.com/@justplainzack/video/7533312105609465143
- https://www.tiktok.com/@katrynwrites/video/7472875912279625002
- https://www.tiktok.com/@ky_mom_79/video/7403790836074319146
- https://www.tiktok.com/@ladymisskay_/video/7404165143791258910
- https://www.tiktok.com/@lilian_sanchezb/video/7401384895819304223
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- https://www.tiktok.com/@madisenbeaty/video/7403193600298732843
- https://www.tiktok.com/@mandykayschendel/video/7451818880177098026
- https://www.tiktok.com/@mariannenafsu/video/7457376827909115167
- https://www.tiktok.com/@meangirlpod/video/7406307829604306218
- https://www.tiktok.com/@megynkellyshow/video/7457306648286186783
- https://www.tiktok.com/@megynkellyshow/video/7543738049549683998
- https://www.tiktok.com/@missxtinab/video/7404263281952705834
- https://www.tiktok.com/@moviesandmanis/video/7403748232678870304
- https://www.tiktok.com/@msnbc/video/7451784725477281066
- https://www.tiktok.com/@nbcnews/video/7451272514296237354
- https://www.tiktok.com/@newsnationnow/video/7457012502493187358
- https://www.tiktok.com/@officialsagesteele
- https://www.tiktok.com/@officialsagesteele/video/7457284296856866091
- https://www.tiktok.com/@people/video/7450882344799505694
- https://www.tiktok.com/@pinkponypolitics/video/7402295569705635103
- https://www.tiktok.com/@pop.diaries/video/7456540313121721630
- https://www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1ODczNT
  I3MzU2MTk4MTc0Mg
- https://www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1ODQ3O
  TE4MjYxNzg3MTE1MA
- https://www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1ODQwM
  jMyMjYxNzk3NTU5NA
- https://www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1ODUyO
  TY2MDM5NDMyNDc3OQ
- https://www.tiktok.com/@popculturetea789/video/7469055988419661089
- https://www.tiktok.com/@readchoi/video/7403521915593297182
- https://www.tiktok.com/@realtoktimes/video/7403164871925222698
- https://www.tiktok.com/@receiptdigger/video/7467848313354669343
- https://www.tiktok.com/@robandhaley/video/7451721565428796714
- https://www.tiktok.com/@sboshmafu/video/7402551540612926726
- https://www.tiktok.com/@shannonhillnews/video/7472056584688930078
- https://www.tiktok.com/@spillsesh_yt/video/7403084712291421470
- https://www.tiktok.com/@sports.entertainment77/video/7404965074948885765
- https://www.tiktok.com/@sports.entertainment77/video/7406100599554542854
- https://www.tiktok.com/@sports.entertainment77/video/7406500944793357573
- https://www.tiktok.com/@staceymcgunnigle/video/7518167012699426078
- https://www.tiktok.com/@stephwithdadeets/video/7461764522626354474
- https://www.tiktok.com/@stephwithdadeets/video/7470668851458411818
- https://www.tiktok.com/@stephwithdadeets/video/7506539214650068255
- https://www.tiktok.com/@sweetandsaltylin/video/7532889211054066975
- https://www.tiktok.com/@taylorgossipvibes/video/7458507542000323871
- https://www.tiktok.com/@taylorgossipvibes/video/7471867456785616158

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- https://www.tiktok.com/@thatwaswildpod/video/7470600424228130091
- https://www.tiktok.com/@thegmansour/video/7403382359027993902
- https://www.tiktok.com/@thenewsmovement/photo/7451980065379831070
- https://www.tiktok.com/@theredcoquette/video/7403484998612913451
- https://www.tiktok.com/@thesimplysimone/video/7450879640308075818
- https://www.tiktok.com/@thetvandmoviequeen/video/7402428820034211115
- https://www.tiktok.com/@thisisdanabowling/video/7497112188755135786
- https://www.tiktok.com/@tiktig82/video/7467903718638259463
- https://www.tiktok.com/@yamishkatv/video/7420633815900638506
- https://www.tiktok.com/@yamishkatv/video/7467391519088020778
- https://www.tiktok.com/@yleniasopinions/video/7403286903279160608
- https://www.tiktok.com/@zaila_collection/video/7406003134113352976
- https://www.tiktok.com/@zoeunlimited/video/7418219074603273502
- https://www.tiktok.com/search?q=%23blakelivelyisaliar&t=1754944192461
- https://www.youtube.com/@PerezHilton/search?query=lively
- https://www.youtube.com/@PopcornedPlanet/search?query=blake%20lively
- https://www.youtube.com/@RealCandaceO
- https://www.youtube.com/c/MegynKelly
- https://www.youtube.com/live/twp3BNWQ0BU
- https://www.youtube.com/popcornedplanet
- https://www.youtube.com/shorts/nzd0PVdgoiA
- https://www.youtube.com/shorts/oBJonkSs-VA
- https://www.youtube.com/watch?app=desktop&v=YkbyKYaiwRg
- https://www.youtube.com/watch?v=_T-vKuBIJcs
- https://www.youtube.com/watch?v=-qcRGWgL9Ow&lc=
- https://www.youtube.com/watch?v=-qcRGWgL9Ow&lc=Ugxa_DuG4lOjrg9PhV14AaABAg
- https://www.youtube.com/watch?v=-qcRGWgL9Ow&lc=UgxG8tkYeM-U-UYRFoR4AaABAg
- https://www.youtube.com/watch?v=0E3Q9POxssA
- https://www.youtube.com/watch?v=0wAH6PllOOY
- https://www.youtube.com/watch?v=12lFC-5hBbU
- https://www.youtube.com/watch?v=1RiX_2-VLyg
- https://www.youtube.com/watch?v=2gMIYXxsNwg
- https://www.youtube.com/watch?v=2h-Ml5nPYCw
- https://www.youtube.com/watch?v=3cHghWdBXAk
- https://www.youtube.com/watch?v=3p9Qm7LGrng
- https://www.youtube.com/watch?v=4Oi4Ly1nDVQ
- https://www.youtube.com/watch?v=5CFen30FRNQ
- https://www.youtube.com/watch?v=5jCcKu-1tTQ
- https://www.youtube.com/watch?v=5NxKwJnHD0A
- https://www.youtube.com/watch?v=5T28wu6HlMU
- https://www.youtube.com/watch?v=68lXahcQtIY
- https://www.youtube.com/watch?v=6pUeMFiRlds

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- https://www.youtube.com/watch?v=6s5YKo5Regc
- https://www.youtube.com/watch?v=6WsXUMztWzY
- https://www.youtube.com/watch?v=6WsXUMztWzY&lc=Ugw7vEZvbCArsgdhAwB4AaABAg
- https://www.youtube.com/watch?v=6yiKOZJjmjI
- https://www.youtube.com/watch?v=78kPeD4ZRw8
- https://www.youtube.com/watch?v=7ngL8oCWbsQ
- https://www.youtube.com/watch?v=7OxKeH4SnnM
- https://www.youtube.com/watch?v=808LxrJJIaQ
- https://www.youtube.com/watch?v=83UWkugKE28
- https://www.youtube.com/watch?v=Agf6a2xSCCk
- https://www.youtube.com/watch?v=BKEyQzRRjys
- https://www.youtube.com/watch?v=BuUMD-0jhrw
- https://www.youtube.com/watch?v=ct9JVSbQVKI
- https://www.youtube.com/watch?v=d7QXja97Gf4
- https://www.youtube.com/watch?v=DwsbVFr7ANA
- https://www.youtube.com/watch?v=E2iQXZ1aTfk
- https://www.youtube.com/watch?v=F2-2RBi1qzY
- https://www.youtube.com/watch?v=fdWRR6yArb8
- https://www.youtube.com/watch?v=fIhmPkaD5ZY
- https://www.youtube.com/watch?v=GhjRPjsLsi0
- https://www.youtube.com/watch?v=gj_zYwv7ulw
- https://www.youtube.com/watch?v=gQjHLo8kg9w
- https://www.youtube.com/watch?v=GQqxdeqs4wY
- https://www.youtube.com/watch?v=GQqxdeqs4wY&lc=Ugxp7u7gmx5YHqja4rB4AaABAg
- https://www.youtube.com/watch?v=GQqxdeqs4wY&lc=UgyMr8j5lLMU3V9WGgV4AaABAg
- https://www.youtube.com/watch?v=IjEV2wg7Qxo
- https://www.youtube.com/watch?v=ijr5bMvQWQI
- https://www.youtube.com/watch?v=J7jyvDCTyjQ
- https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgwTLutqx22Mu-OlR2h4AaABAg
- https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgwyXnicTxlv5VmvrtZ4AaABAg
- https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgyUI31ydQm_liFIdx94AaABAg.A7SD9nfzgZuA7SGRgT6cCg
- https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgzKVhQPkzwSXLlgQFx4AaABAg
- https://www.youtube.com/watch?v=J7jyvDCTyjQ&lc=UgzrUGqfIlVix9hsS5l4AaABAg&pp=0gcJCSMANpG00pGi
- https://www.youtube.com/watch?v=jhBSqg4Ubc8
- https://www.youtube.com/watch?v=juB77OYTx08
- https://www.youtube.com/watch?v=Kagte8nvZnM

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- https://www.youtube.com/watch?v=kUpmiZw29-s
- https://www.youtube.com/watch?v=lArht7dBUg8
- https://www.youtube.com/watch?v=M-OZdg1jbbk&lc=Ugw9Xgd-cNyJUrewiC54AaABAg
- https://www.youtube.com/watch?v=M-OZdg1jbbk&lc=Ugz68DN-QjSLLkScB8B4AaABAg
- https://www.youtube.com/watch?v=M-OZdg1jbbk&lc=Ugzje7aUw1B26TSug9F4AaABAg
- https://www.youtube.com/watch?v=M-OZdg1jbbk
- https://www.youtube.com/watch?v=me5UDZby-oA
- https://www.youtube.com/watch?v=MuCyRA4XAyo
- https://www.youtube.com/watch?v=MvGf6_P88CU
- https://www.youtube.com/watch?v=N0faMJqIefA
- https://www.youtube.com/watch?v=NxBASQXV5E8
- https://www.youtube.com/watch?v=NXmq1WGnOL8
- https://www.youtube.com/watch?v=OasooLSnyFs
- https://www.youtube.com/watch?v=Oh70XZ-wT4U
- https://www.youtube.com/watch?v=OnEGAcsFy-o
- https://www.youtube.com/watch?v=PR6xEq2l5Yg
- https://www.youtube.com/watch?v=Q_udFpwwy74
- https://www.youtube.com/watch?v=Q4rmrn3Qa3c
- https://www.youtube.com/watch?v=Q4yniMqrlgI
- https://www.youtube.com/watch?v=Q4yniMqrlgI&lc=UgyjzgYrWhilbpZLajd4AaABAg
- https://www.youtube.com/watch?v=QBo6tK9qRaA
- https://www.youtube.com/watch?v=qMrb3FT2gDY
- https://www.youtube.com/watch?v=QOhmvhKXYso
- https://www.youtube.com/watch?v=Qvj3WOSFYYo
- https://www.youtube.com/watch?v=rs-i3m5zPH8
- https://www.youtube.com/watch?v=sM98NYMS9R0
- https://www.youtube.com/watch?v=So60ehEvhHE
- https://www.youtube.com/watch?v=SsSBYw83TJs
- https://www.youtube.com/watch?v=TcM404xE78M
- https://www.youtube.com/watch?v=TSrz_JvGcxo
- https://www.youtube.com/watch?v=tUzLFODCZuE
- https://www.youtube.com/watch?v=uGKNhzhEAQo
- https://www.youtube.com/watch?v=UNJEhTiNOrk
- https://www.youtube.com/watch?v=v2OGwByAIQU
- https://www.youtube.com/watch?v=VaorU6_P4uk
- https://www.youtube.com/watch?v=veBwSaOWvr8
- https://www.youtube.com/watch?v=vHqce01-zg0
- https://www.youtube.com/watch?v=VjzsNAn21hg
- https://www.youtube.com/watch?v=VLFu-QK7z2k&lc=UgxPD7QCS-LLxcp-pX54AaABAg
- https://www.youtube.com/watch?v=vzDsaQfN160

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- https://www.youtube.com/watch?v=VZhKVuc8xIc
- https://www.youtube.com/watch?v=wB1evxkisdw
- https://www.youtube.com/watch?v=wQpaaYz06iE
- https://www.youtube.com/watch?v=xduHryXb47A
- https://www.youtube.com/watch?v=XGiVTUQAvuA
- https://www.youtube.com/watch?v=xRKuEAppEuM
- https://www.youtube.com/watch?v=xy4JwD-E33c
- https://www.youtube.com/watch?v=YXl_5OMypV8
- https://www.youtube.com/watch?v=ZeBhfJcEg88
- https://www.youtube.com/watch?v=ZH_wJUY2bNQ
- https://www.youtube.com/watch?v=zw35Hd9J6YU
- https://x.com/5CHRIS_8/status/1870615740551938395
- https://x.com/AllAboutTRH/status/1876747448712089783
- https://x.com/AllAboutTRH/status/1912523156281085958
- https://x.com/andysignore/status/1879963720966893842
- https://x.com/aubreyvision/status/1823484536107237378
- https://x.com/bungarsargon/status/1892191955393663196
- https://x.com/Daily_MailUS/status/1824771655693992239
- https://x.com/Daily_MailUS/status/1880826420470907035/photo/1
- https://x.com/DailyMail/status/1826070385663610936
- https://x.com/DailyMail/status/1874415118655586482
- https://x.com/DEADLINE/status/1880793360899928302
- https://x.com/Dharaura1/status/1880917106755281147
- https://x.com/dont_be_common/status/1870531831562744185
- https://x.com/drugproblem/status/1902060511023526281
- https://x.com/F1FanRSA/status/1874489426451263491
- https://x.com/FemCondition/status/1875202862445420791
- https://x.com/filmfare/status/1870715270828101681?lang=ar
- https://x.com/FlorioGina/status/1871236542355869758
- https://x.com/GabrielDivina2/status/1823369798769946743
- https://x.com/gimpdiculous/status/1874536478468161812
- https://x.com/ItsMeKhaya_/status/1886140642927018465
- https://x.com/jameslb157/status/1880829684499534100
- https://x.com/JDessaigne/status/1874512315934241197
- https://x.com/justplainzack/status/1880116658184024283
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- https://x.com/LadyColinCampb/status/1900889541344391661
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- https://x.com/LesNew5/status/1870496842120921285
- https://x.com/LindaSm39300331/status/1874521086144168252
- https://x.com/LizCrokin/status/1824618500431724917
- https://x.com/LizCrokin/status/1888828588960436400
- https://x.com/mariagarrett21/status/1922842427292782734
- https://x.com/mega2e/status/1870493578864349566?

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- https://x.com/MeghansMole/status/1871640656172761570
- https://x.com/MeghansMole/status/1891510955818791016
- https://x.com/megynkelly
- https://x.com/MegynKellyShow/status/1876750995645964337
- https://x.com/MegynKellyShow/status/1893076645528924186
- https://x.com/Mistie_Mo/status/1937543940447797592
- https://x.com/MrsTrueCrime/status/1824660759172841588
- https://x.com/Mystifeye/status/1916225150665511258
- https://x.com/NewsiniApp/status/1880798070654263432
- https://x.com/NewsiniApp/status/1880798399227732206
- https://x.com/PageSix/status/1883270538228879375
- https://x.com/paperkrums/status/1870859158825677037
- https://x.com/PopBase/status/1870478849341071388?lang=en
- https://x.com/Quin4Trump/status/1875464778690265594
- https://x.com/realmelanieking/status/1891266207493378434
- https://x.com/realmelanieking/status/1900258927658623415
- https://x.com/realmelanieking/status/1901796562453372967
- https://x.com/RNN_RoyalNews/status/1890609227661562169
- https://x.com/sage1411/status/1879894977926570326
- https://x.com/sagesteele/status/1876752992164044966?lang=en
- https://x.com/SapienAssassin/status/1892952603199148494
- https://x.com/SapienAssassin/status/1898088493294780423
- https://x.com/SaraFoxx1/status/1891344404423536753
- https://x.com/shittyshiv/status/1823418528613196145
- https://x.com/smithson_kit/status/1880998052674306307
- https://x.com/spiritualshift_/status/1882494811082797256
- https://x.com/spiritualshift_/status/1890902467451482579
- https://x.com/spiritualshift_/status/1892642914804891838
- https://x.com/spiritualshift_/status/1903154642881745088
- https://x.com/spiritualshift_/status/1923511620778766687
- https://x.com/StephanieSidley/status/1891357967468958093
- https://x.com/TaraBull808/status/1870553149456679090
- https://x.com/theanchoragent/status/1880802279412117607
- https://x.com/TheFabBookLover/status/1906759687585800698
- https://x.com/ThePerezHilton/status/1880070359460020706
- https://x.com/thr
- https://x.com/THR/status/1876758515433529750
- https://x.com/THR/status/1877060201871978546
- https://x.com/TinaTweeker/status/1874865743407247612
- https://x.com/TMZ/status/1883226938359022058
- https://x.com/Variety/status/1828462980415267285
- https://x.com/Variety/status/1870483480314073476
- https://x.com/WeSmirch/status/1881007545201946958
- https://x.com/XOQueenEsther/status/1886578087665541323

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- https://x.com/XoxoAudrey4ever/status/1891089973236924678
- https://x.com/xxsmnrsxx/status/1885752064036229129
- https://x.com/Zain72170560/status/1880809849019339246
- https://youtu.be/6GYhQEvaqn0?t=70
- https://www.youtube.com/watch?v=2gMIYXxsNwg__
- www.tiktok.com/@adrianne.louie/video/7457887853083708718?cid=NzQ1Nzk3OTQ3Nzk0ODkwODMxOA
- www.tiktok.com/@adrianne.louie/video/7457887853083708718?cid=NzQ1NzkzNjM5Mjc0MzMyMjQxNA
- www.tiktok.com/@adrianne.louie/video/7457887853083708718?cid=NzQ1OTA1MTA2NDgzNjE3ODY5Ng
- www.tiktok.com/@bbcnews/video/7451985672899956001?cid=NzQ1MjgzMTUxMTEwNTMwNzM5O
- www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=NzQ2Mjc0ODkyNDYzOTY5MTU2Mg
- www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=NzQ2MjYxNTMzMTQzOTAxODc4Mw
- www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=NzQ2MjYxODE1NjY2ODA2MDQ0Ng
- www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=NzQ2MjYyOTk5MTAxNDI2OTcwMg
- www.tiktok.com/@bee.better.company/video/7462611161788239110?cid=NzQ2MzIwNDQ2NzE1OTA4OTk2Ng
- www.tiktok.com/@candaceoshow/video/7462967281748856095?cid=NzQ2Mjk5NzAxMTY1MTk4NjE4NA
- www.tiktok.com/@dailymail/video/7450903492358573358?cid=NzQ1MDk2Mzk3ODE4NjA5NzQzOA
- https://www.tiktok.com/@elleuk/video/7402270193398861088
- https://www.tiktok.com/@elleuk/video/7408205773366447393
- www.tiktok.com/@justplainzack/video/7533312105609465143?cid=NzUzMzM0ODY3MjIwNjg2NTE4Mw
- www.tiktok.com/@justplainzack/video/7533312105609465143?cid=NzUzMzMyMjgwODY4MTg3NDE4OQ
- www.tiktok.com/@justplainzack/video/7533312105609465143?cid=NzUzMzMzODg2MDc3Mjc3MDU4Mg
- www.tiktok.com/@justplainzack/video/7533312105609465143?cid=NzUzMzQ1MzUyNzMwMzE0NDIxMA
- www.tiktok.com/@justplainzack/video/7533312105609465143?cid=NzUzMzQxODM3MTUwMjg1MDgyOQ
- www.tiktok.com/@mariannenafsu/video/7457376827909115167?cid=NzQ1Nzc2OTE1MzY3Nzg1MzQ4Ng
- www.tiktok.com/@mariannenafsu/video/7457376827909115167?cid=NzQ1NzM4MDMzNDAxMjAwNzIxMQ
- www.tiktok.com/@megynkellyshow/video/7457306648286186783?cid=NzQ1NzM2NjE2MTA1MjAwOTIxNw

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- www.tiktok.com/@megynkellyshow/video/7457306648286186783?cid=NzQ1NzQwNT c0OTMzNTQwOTQ1MA
- www.tiktok.com/@megynkellyshow/video/7457306648286186783?cid=NzQ2MDQxMj gwMTIwNDY2NzE0Mg
- www.tiktok.com/@newsnationnow/video/7457012502493187358?cid=NzQ1NzA0NDA 3ODQzNTY0ODI2NA
- www.tiktok.com/@newsnationnow/video/7457012502493187358?cid=NzQ1NzE2NzAy OTY4Nzk5MzEzNA
- www.tiktok.com/@officialsagesteele/video/7457284296856866091
- www.tiktok.com/@people/video/7450882344799505694?cid=NzQ1MDg4OTQ3Mzk0Nj IwNzAxOA
- www.tiktok.com/@people/video/7450882344799505694?cid=NzQ1MDk4NDg4OTUxO DY1NDIzOQ
- www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1NzU4NTI0MT YzNzk3ODkxMA
- www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1NzYxMDE1Mz k3MTEzOTM1OQ
- www.tiktok.com/@pop.diaries/video/7456540313121721630?cid=NzQ1ODY4NTMyNT I2NDUzNjM1MQ
- www.tiktok.com/@robandhaley/video/7451721565428796714?cid=NzQ1NTIzNzA0OD gwNDUyNDgyMg

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APPENDIX D – IMPRESSIONS OF PLANTED CONTENT

Tabloid Articles Coordinated with Defendants

Date	Article Link	Impressions
08-17-2024	https:/www.dailymail.co.uk/tvshowbiz/article-13750525/blake-lively-taylor-swift-copied-friendship-justin-baldoni-drama.html	140,760
08-20-2024	https:/www.dailymail.co.uk/femail/article-13761985/How-Blake-Livelys-fairytale-turned-PR-nightmare-Amid-growing-backlash-ALISON-BOSHOFF-reveals-went-wrong-Hollywoods-golden-girl.html	64,624
08-27-2024	https://variety.com/2024/film/news/it-ends-with-us-sequel-in-doubt-blake-lively-justin-baldoni-feud-1236114099/	45,882
		251,266

Sage Steele Social Media Posts and Podcast Episodes

Date	Post Link	Impressions
01-07-2025	https:/www.youtube.com/watch?v=2gMIYXxsNwg__	213,700
01-07-2025	https://www.instagram.com/reel/DEiZu-9xGMB/?hl=en	332,000
01-07-2025	www.tiktok.com/@officialsagesteele/video/7457284296856866091	1,500,000
01-07-2025	https://open.spotify.com/episode/1HvHMVCkWxm9JIpPHZPfFC	n/a
01-07-2025	https://podcasts.apple.com/us/podcast/shame-on-blake-lively-the-new-york-times/id1754460914?i=1000683220818	n/a
01-07-2025	https://www.threads.com/@sagesteele/post/DEiaZPeRV7s	44,570
01-08-2025	https://www.audible.com/podcast/Shame-on-Blake-Lively-The-New-York-Times/B0DSJX5SLP	n/a
01-07-2025	https://www.facebook.com/17841401462773682/videos/917775630132577/	332,000
01-07-2025	https://x.com/sagesteele/status/1876752992164044966?lang=en	539,100
		2,961,370

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Tabloid Articles Repeating Planted Phrases

Date	Article Link	Impressions
08-09-2024	https://www.elle.com/uk/life-and-culture/culture/a61823800/justin-baldoni-interview/	3,602
08-09-2024	https://www.today.com/popculture/movies/justin-baldoni-it-ends-with-us-interview-rcna165792	1,887
08-09-2024	https://perezhilton.com/justin-baldoni-talks-challenge-working-with-complex-personalities-it-ends-with-us-amid-blake-lively-beef/	3,568
08-09-2024	https://www.eonline.com/news/1405962/justin-baldoni-details-working-with-complex-personalities-on-it-ends-with-us	86,286
08-12-2024	https://www.tmz.com/2024/08/12/blake-lively-justin-baldoni-feud/	251,663
08-13-2024	https://www.yahoo.com/entertainment/justin-baldoni-says-friction-while-212011241.html	525,821
08-13-2024	https://collider.com/it-ends-with-us-feud-blake-lively-justin-baldoni/	127,223
08-13-2024	https://pagesix.com/2024/08/13/celebrity-news/blake-lively-approved-final-cut-of-it-ends-with-us-amid-feud/	129,596
08-13-2024	https://people.com/justin-baldoni-sweden-trip-amid-friction-with-it-ends-with-us-cast-8694730	696,600
08-13-2024	https://www.buzzfeed.com/larryfitzmaurice/justin-baldoni-friction-making-it-ends-with-us	6,911
08-13-2024	https://www.dailymail.co.uk/tvshowbiz/article-13740163/justin-baldoni-friction-ends-feud-rumors-blake-lively.html	140,760
08-13-2024	https://www.justjared.com/2024/08/13/justin-baldoni-addresses-friction-on-it-ends-with-us-set/	12,875
08-14-2024	https://www.digitalspy.com/movies/a61873035/it-ends-with-us-justin-baldoni-friction/	6,428
08-14-2024	https://www.forbes.com/sites/conormurray/2024/08/14/why-fans-think-it-ends-with-us-stars-blake-lively-justin-baldoni-are-feuding-as-baldoni-reportedly-hires-crisis-pr/	24,871
08-14-2024	https://www.lifeandstylemag.com/posts/justin-baldoni-on-friction-amid-it-ends-with-us-feud-rumors/	4,008
08-14-2024	https://www.thecut.com/article/it-ends-with-us-blake-lively-justin-baldoni-feud-rumors-explained.html	23,848
08-15-2024	https://www.radiotimes.com/movies/it-ends-with-us-justin-baldoni-friction-newsupdate/	2,525

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Date	Article Link	Impressions
08-15-2024	https://www.unilad.com/film-and-tv/news/it-ends-with-us-justin-baldoni-speaks-out-blake-lively-785745-20240815	1,805
		2,050,277

"Little Bump" Interview Content

Date	Post Link	Impressions
08-09-2024	https://www.dailymail.co.uk/tvshowbiz/article-13727789/it-ends-blake-lively-justin-baldoni-feud.html	140,760
08-08-2024	https://www.dailymail.co.uk/femail/article-13723621/blake-lively-justin-baldoni-feud-drama.html	64,624
08-14-2024	https://www.dailymail.co.uk/femail/article-13742877/reporter-blake-lively-interview-quit-ends-feud.html	64,624
08-10-2024	https://www.youtube.com/watch?v=F2-2RBi1qzY	7,221,078
		7,491,086

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APPENDIX E – CAMPAIGN TERMS IMPRESSIONS CALCULATION

Source	Date	Link	Impressions
TV			
Fox News at Night	2025-02-23	https://archive.org/details/FOXNEWSW_20250204_040000_Fox_News_at_Night/start/3120/end/3180	1,816,000
The Big Weekend Show	2025-03-16	https://archive.org/details/FOXNEWSW_20250316_220000_The_Big_Weekend_Show/start/2673/end/2733	1,811,000
The Ingraham Angle	2025-02-07	https://archive.org/details/FOXNEWSW_20250208_000000_The_Ingraham_Angle/start/2760/end/2820	3,471,000
Fox Business	2025-03-06	https://archive.org/details/FBC_20250306_160000_Varney__Company/start/1140/end/1200	270,000
Laura Coates Live	2025-02-03	https://archive.org/details/CNNW_20250204_040000_Laura_Coates_Live/start/3357/end/3417	430,000
Today Show	2025-05-23	https://archive.org/details/KNTV_20250523_140000_Today/start/2040/end/2100	2,575,000
Nightline	2025-02-01	https://archive.org/details/KGO_20250201_083700_Nightline/start/600/end/660	819,000
		TV SUBTOTAL	**11,192,000**

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Source	Date	Link	Impressions
TikTok			
_Camcamcan	2024-08-15	https://www.tiktok.com/@_camcamcan/video/7403387648561237290	92,000
.Filmch3rry	2024-08-19	https://www.tiktok.com/@.filmch3rry/video/7405004854021688618	18,700,000
Aliza Licht XO	2024-08-17	https://www.tiktok.com/@alizalichtxo/video/7404141938972167455	24,500
Aliza Licht XO	2024-12-21	https://www.tiktok.com/@alizalichtxo/video/7450988420127575338	11,400
BaconEggy_Peggy Pew	2025-02-13	https://www.tiktok.com/@baconeggy_peggypew/video/7471002058288565547	14,500
Bbieberfever._jb	2024-08-24	https://www.tiktok.com/@bbieberfever._jb/video/7406668647030197534	33,300
BrennasBakery	2024-08-15	https://www.tiktok.com/@brennasbakery/video/7403556333796085034	2,900,000
Brittany Lyla Official	2024-08-14	https://www.tiktok.com/@brittanylylaofficial/video/7403111122385079594	1,800
Calabasas Wings	2024-08-17	https://www.tiktok.com/@calabasaswings/video/7404224889642847520	188,800
Catching Fun	2025-01-10	https://www.tiktok.com/@catching.fun/video/7458278522742918446	22,100
Clout Chat Media	2025-01-27	https://www.tiktok.com/@cloutchatmedia/video/7464499995375373601	16,200
Coffee With Charlotte	2025-08-15	https://www.tiktok.com/@coffeewithcharlotte/video/7403541144635854123	1,300
Dibarazzi	2025-02-19	https://www.tiktok.com/@dibarazzi/video/7473214143823220010	3,200,000
Dr. Zoe Shes a crowd	2024-08-15	https://www.tiktok.com/@dr.zoe.shesacrowd/video/7403340193517915408	8,349
Fanatic Media	2025-06-18	https://www.tiktok.com/@fanaticmedia_/video/7517289853252324630	894,700
FRYP	2024-08-19	https://www.tiktok.com/@0fryp0/video/7404890422448803105	17,700,000
H3 Podcast	2024-08-28	https://www.tiktok.com/@h3_podcast/video/7408264155339214112	44,000
Hazel.Talks.Gossip	2024-12-23	https://www.tiktok.com/@hazel.talks.gossip/video/7451540172518214942	639,600
https_Cyberkim	2024-12-29	https://www.tiktok.com/@https_cyberkim/video/7454050759160712478	5,300,000

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Source	Date	Link	Impressions
Independent_USA	2024-08-15	https://www.tiktok.com/@independent_usa/video/7403438099532991774	3,600,000
Its Miss Loulita	2024-08-11	https://www.tiktok.com/@itsmissloulita/photo/7402006956111662369	4,600,000
Its Miss Loulita	2024-08-23	https://www.tiktok.com/@itsmissloulita/video/7406409280225660193	139,500
Joy Sparkle Shine	2024-12-22	https://www.tiktok.com/@joysparkleshine/video/7451295307146759470	1,100,000
Joy Sparkle Shine	2024-12-22	https://www.tiktok.com/@joysparkleshine/video/7451347444484345131	5,700,000
JustBri_Always	2024-08-15	https://www.tiktok.com/@justbri_always/video/7403580304826420511	51,700
JustBri_Always	2025-01-12	https://www.tiktok.com/@justbri_always/video/7459171217090563370	159,400
Katryn Writes	2025-02-18	https://www.tiktok.com/@katrynwrites/video/7472875912279625002	337,800
Ky_mom_79	2024-08-16	https://www.tiktok.com/@ky_mom_79/video/7403790836074319146	35,800
Lady Miss Kay	2024-08-17	https://www.tiktok.com/@ladymisskay_/video/7404165143791258910	302,600
Lilian_SanchezB	2024-08-10	https://www.tiktok.com/@lilian_sanchezb/video/7401384895819304223	377,400
Loving Single	2024-08-17	https://www.tiktok.com/@lovingsingle/video/7404316247015329055	61,000
lyltokyo	2024-08-14	https://www.tiktok.com/@lyltokyo/video/7403006470003920159	673,500
Mean Girl Pod	2024-08-23	https://www.tiktok.com/@meangirlpod/video/7406307829604306218	28,400
Megyn Kelly Show	2025-08-28	https://www.tiktok.com/@megynkellyshow/video/7543738049549683998	1,200,000
Miss Xtina B	2024-08-17	https://www.tiktok.com/@missxtinab/video/7404263281952705834	674,900
Movies and Manis	2024-08-16	https://www.tiktok.com/@moviesandmanis/video/7403748232678870304	144,400
Pop.Diaries	2025-01-05	https://www.tiktok.com/@pop.diaries/video/7456540313121721630	13,200,000
Pop Culture Tea 789	2025-02-08	https://www.tiktok.com/@popculturetea789/video/7469055988419661089	191,200
ReadChoi	2024-08-15	https://www.tiktok.com/@readchoi/video/7403521915593297182	587,900
RealTok Times	2024-08-14	https://www.tiktok.com/@realtoktimes/video/7403164871925222698	1,800,000
Receipt Digger	2025-02-05	https://www.tiktok.com/@receiptdigger/video/7467848313354669343	2,252

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Source	Date	Link	Impressions
Shannon Hill	2025-02-16	https://www.tiktok.com/@shannonhillnews/video/7472056584688930078	34,700
Spill Sesh	2024-08-14	https://www.tiktok.com/@spillsesh_yt/video/7403084712291421470	891,200
Sports.Entertainment77	2024-08-19	https://www.tiktok.com/@sports.entertainment77/video/7404965074948885765	3,200,000
Sports.Entertainment77	2024-08-22	https://www.tiktok.com/@sports.entertainment77/video/7406100599554542854	1,400,000
Sports.Entertainment77	2024-08-23	https://www.tiktok.com/@sports.entertainment77/video/7406500944793357573	140,500
Steph With Da Deets	2025-02-12	https://www.tiktok.com/@stephwithdadeets/video/7470668851458411818	334,800
SweetandSaltyLin	2025-07-30	https://www.tiktok.com/@sweetandsaltylin/video/7532889211054066975	8,354
Taylor Gossip Vibes	2025-01-10	https://www.tiktok.com/@taylorgossipvibes/video/7458507542000323871	144,800
Taylor Gossip Vibes	2025-02-15	https://www.tiktok.com/@taylorgossipvibes/video/7471867456785616158	12,700
That Was Wild Pod	2025-02-12	https://www.tiktok.com/@thatwaswildpod/video/7470600424228130091	61,900
The G Mansour	2024-08-15	https://www.tiktok.com/@thegmansour/video/7403382359027993902	44,500
The Red Coquette	2024-08-15	https://www.tiktok.com/@theredcoquette/video/7403484998612913451	103,200
The TV and Movie Queen	2024-08-12	https://www.tiktok.com/@thetvandmoviequeen/video/7402428820034211115	6,800,000
This Is Dana Bowling	2025-04-25	https://www.tiktok.com/@thisisdanabowling/video/7497112188755135786	1,700,000
Tiktig82	2025-02-05	https://www.tiktok.com/@tiktig82/video/7467903718638259463	316,100
Yamishkatv	2024-09-30	https://www.tiktok.com/@yamishkatv/video/7420633815900638506	326,800
Yamishkatv	2025-02-03	https://www.tiktok.com/@yamishkatv/video/7467391519088020778	443,600

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Source	Date	Link	Impressions
Ylenias Opinions	2024-08-15	https://www.tiktok.com/@yleniasopinions/video/7403286903279160608	211,400
Zaila_Collection	2024-08-22	https://www.tiktok.com/@zaila_collection/video/7406003134113352976	2,200,000
Zoe Unlimited	2024-09-24	https://www.tiktok.com/@zoeunlimited/video/7418219074603273502	41,700
		TikTok SUBTOTAL	**103,176,555**
YouTube			
Aems	2024-09-09	https://www.youtube.com/watch?v=3cHghWdBXAk	17,407
Alli Beth Stuckey	2025-01-08	https://www.youtube.com/watch?v=gj_zYwv7ulw	91,710
Ammy Robinson	2024-08-12	https://www.youtube.com/watch?v=TSrz_JvGcxo	70,793
Ammy Robinson	2024-08-24	https://www.youtube.com/watch?v=jhBSqg4Ubc8	51,643
Ammy Robinson	2024-10-27	https://www.youtube.com/watch?v=MvGf6_P88CU	142,809
Ammy Robinson	2025-02-14	https://www.youtube.com/watch?v=OasooLSnyFs	54,002
Angelika Oles	2024-09-04	https://www.youtube.com/watch?v=12lFC-5hBbU	93,546
Anna Oop	2024-08-26	https://www.youtube.com/watch?v=tUzLFODCZuE	239,787
Anna Oop	2025-03-22	https://www.youtube.com/watch?v=fdWRR6yArb8	67,669
AshleyB TV	2025-08-29	https://www.youtube.com/watch?v=UNJEhTiNOrk	29,421
Ben Shapiro	2025-01-17	https://www.youtube.com/watch?v=NXmq1WGnOL8	1,105,784
Bopping	2024-08-19	https://www.youtube.com/watch?v=d7QXja97Gf4	2,449,000
Candace Owens	2025-01-08	https://www.youtube.com/watch?v=7ngL8oCWbsQ	1,396,194
Candace Owens	2025-01-22	https://www.youtube.com/watch?v=1RiX_2-VLyg	1,242,283
Candace Owens	2025-02-06	https://www.youtube.com/watch?v=5T28wu6HlMU	2,025,518
Candace Owens	2025-02-12	https://www.youtube.com/watch?v=PR6xEq2l5Yg	1,840,060
Candace Owens	2025-07-01	https://www.youtube.com/watch?v=Q_udFpwwy74	1,333,639
Curious Club	2024-09-29	https://www.youtube.com/watch?v=vzDsaQfN160	37,868

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Source	Date	Link	Impressions
Curious Club	2025-01-25	https://www.youtube.com/watch?v=uGKNhzhEAQo	27,500
D'Angelo	2024-08-22	https://www.youtube.com/watch?v=J7jyvDCTyjQ	1,981,834
Dan Wootton Outspoken	2025-02-28	https://www.youtube.com/watch?v=XGiVTUQAvuA	57,915
Eiriks	2024-08-26	https://www.youtube.com/watch?v=6pUeMFiRlds	98,199
Eiriks	2025-01-26	https://www.youtube.com/watch?v=VaorU6_P4uk	617,034
Eiriks	2025-04-04	https://www.youtube.com/watch?v=7OxKeH4SnnM	46,489
Film Cooper	2024-08-31	https://www.youtube.com/watch?v=me5UDZby-oA	1,071,234
Itz Keisha	2024-08-18	https://www.youtube.com/watch?v=3p9Qm7LGrng	385,101
Kall Me Kris	2025-01-29	https://www.youtube.com/watch?v=Oh70XZ-wT4U	664,214
Kjersti Flaa	2025-12-24	https://www.youtube.com/watch?v=kUpmiZw29-s	153,849
Kjersti Flaa	2024-08-19	https://www.youtube.com/watch?v=MuCyRA4XAyo	994,535
Kjersti Flaa	2025-02-07	https://www.youtube.com/watch?v=rs-i3m5zPH8	132,692
kyeluh	2024-08-21	https://www.youtube.com/watch?v=GhjRPjsLsi0	79,156
Lauren G	2024-08-20	https://www.youtube.com/watch?v=IjEV2wg7Qxo	2732
Lost Beyond Pluto	2025-02-17	https://www.youtube.com/watch?v=83UWkugKE28	32,197
Megan Kelly	2025-01-17	https://www.youtube.com/watch?v=xduHryXb47A	779,051
Megan Kelly	2025-06-11	https://www.youtube.com/watch?v=wB1evxkisdw	147,343
Megyn Kelly	2025-02-13	https://www.youtube.com/watch?v=6yiKOZJjmjI	1,388,851
Megyn Kelly	2025-08-28	https://www.youtube.com/watch?v=VjzsNAn21hg	201,225
Memelord	2025-02-10	https://www.youtube.com/watch?v=6s5YKo5Regc	78,566
Michelle McDaniel	2024-08-17	https://www.youtube.com/watch?v=gQjHLo8kg9w	357,801
Michelle McDaniel	2024-08-24	https://www.youtube.com/watch?v=xy4JwD-E33c	276,158

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Source	Date	Link	Impressions
Next Film	2024-08-20	https://www.youtube.com/watch?v=ijr5bMvQWQI	291,228
Next Season	2024-08-22	https://www.youtube.com/watch?v=wQpaaYz06iE	57,344
OSSA	2024-09-03	https://www.youtube.com/watch?v=E2iQXZ1aTfk	106,563
Perez Hilton	2024-08-12	https://www.youtube.com/watch?v=4Oi4Ly1nDVQ	9,406
Perez Hilton	2025-01-16	https://www.youtube.com/watch?v=fIhmPkaD5ZY	74,688
Perez Hilton	2025-02-13	https://www.youtube.com/watch?v=5NxKwJnHD0A	90,320
Perez Hilton	2025-02-26	https://www.youtube.com/watch?v=NxBASQXV5E8	99,314
Perez Hilton	2025-03-19	https://www.youtube.com/watch?v=VZhKVuc8xIc	12,635
Perez Hilton	2025-07-15	https://www.youtube.com/watch?v=5jCcKu-1tTQ	22,144
Perez Hilton	2025-07-24	https://www.youtube.com/watch?v=TcM404xE78M	37,750
Perez Hilton	2025-07-24	https://www.youtube.com/watch?v=OnEGAcsFy-o	44,114
Popcorned Planet	2024-08-15	https://www.youtube.com/live/twp3BNWQ0BU	293,033
Popcorned Planet	2024-09-06	https://www.youtube.com/watch?v=68lXahcQtIY	70,874
Popcorned Planet	2025-07-23	https://www.youtube.com/watch?v=808LxrJJIaQ	140,458
Popcorned Planet	2024-08-16	https://www.youtube.com/watch?v=Agf6a2xSCCk	166,719
Popcorned Planet	2025-06-17	https://www.youtube.com/watch?v=v2OGwByAIQU	121,949
Popcorned Planet	2025-01-16	https://www.youtube.com/watch?v=Kagte8nvZnM	271,998
Shirley Lo	2024-09-03	https://www.youtube.com/watch?v=ZH_wJUY2bNQ	77,275
SLOAN	2025-01-19	https://www.youtube.com/watch?v=DwsbVFr7ANA	645,361
Spill Sesh	2024-08-22	https://www.youtube.com/watch?v=Qvj3WOSFYYo	315,922
Swoop	2024-10-28	https://www.youtube.com/watch?v=_T-vKuBIJcs	970,037
The Celebrity Expert - FilMonger	2024-08-20	https://www.youtube.com/watch?app=desktop&v=YkbyKYaiwRg	23,809

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Source	Date	Link	Impressions
The Comment Section	2024-08-19	https://www.youtube.com/watch?v=M-OZdg1jbbk	1,582,676
The Straits Times	2024-08-22	https://www.youtube.com/watch?v=BKEyQzRRjys	3,387
		YouTube SUBTOTAL	27,391,813
X			
All About TRH	2025-01-07	https://x.com/AllAboutTRH/status/1876747448712089783	488,000
Andy Signore	2025-01-16	https://x.com/andysignore/status/1879963720966893842	19,800
Aubrey Vision	2024-08-13	https://x.com/aubreyvision/status/1823484536107237378	253,900
B. Ungar-Sargon	2025-02-19	https://x.com/bungarsargon/status/1892191955393663196	112,600
Bejeweled Paige	2025-01-16	http://twitter.com/bejeweledpaige/statuses/1880028973150924972	2,000,000
Daily Mail	2025-01-01	https://x.com/DailyMail/status/1874415118655586482	5,448
Deltaco 27	2024-08-14	http://twitter.com/Deltaco27/statuses/1823917952816583164	851,800
Drug Problem	2025-03-18	https://x.com/drugproblem/status/1902060511023526281	157,700
F1 Fan RSA	2025-01-01	https://x.com/F1FanRSA/status/1874489426451263491	341
Fem Condition	2025-01-03	https://x.com/FemCondition/status/1875202862445420791	255,200
Florio Gina	2024-12-23	https://x.com/FlorioGina/status/1871236542355869758	218,100
Gabriel Divina 2	2024-08-13	https://x.com/GabrielDivina2/status/1823369798769946743	4,000,000
Gimp Diculous	2025-01-01	https://x.com/gimpdiculous/status/1874536478468161812	232
Im Ur Mastermind	2025-01-01	http://twitter.com/imurmastermind/statuses/1874469561371906543	572
Its Me Khaya	2025-02-02	https://x.com/ItsMeKhaya_/status/1886140642927018465	95,300
J. Dessaigne	2025-01-01	https://x.com/JDessaigne/status/1874512315934241197	767
Just Plain Zack	2025-01-17	https://x.com/justplainzack/status/1880116658184024283	84,800
Kiara Jade 2001	2025-03-25	https://x.com/kiarajade2001/status/1902817483783917705	202,400

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Source	Date	Link	Impressions
Lady Colin Campbell	2025-03-15	https://x.com/LadyColinCampb/status/1900889541344391661	28,300
Les New 5	2024-12-21	https://x.com/LesNew5/status/1870496842120921285	455,700
Linda Sm 39300331	2025-01-01	https://x.com/LindaSm39300331/status/1874521086144168252	230
Liz Crokin	2025-02-10	https://x.com/LizCrokin/status/1888828588960436400	60,800
Liz Crokin	2024-08-17	https://x.com/LizCrokin/status/1824618500431724917	151,400
LizCrokin	2024-08-16	http://twitter.com/LizCrokin/statuses/1824613700113686913	716,300
Maria Garrett 21	2025-05-14	https://x.com/mariagarrett21/status/1922842427292782734	48,600
Maze Moore	2025-02-02	http://twitter.com/mazemoore/statuses/1885947337350029426	2,000,000
Meghans Mole	2025-02-17	https://x.com/MeghansMole/status/1891510955818791016	754,700
Meghans Mole	2024-12-24	https://x.com/MeghansMole/status/1871640656172761570	212,900
Megyn Kelly Show	2025-02-21	https://x.com/MegynKellyShow/status/1893076645528924186	148,800
Megyn Kelly Show	2025-01-07	https://x.com/MegynKellyShow/status/1876750995645964337	29,500
Mrs. True Crime	2024-08-17	https://x.com/MrsTrueCrime/status/1824660759172841588	25,600
Mystifeye	2025-04-26	https://x.com/Mystifeye/status/1916225150665511258	29,800
Page Six	2025-01-25	https://x.com/PageSix/status/1883270538228879375	294,000
Perez Hilton	2024-08-15	http://twitter.com/PerezHilton/statuses/1824239689517195631	5,500
Perez Hilton	2024-08-21	http://twitter.com/PerezHilton/statuses/1826468186176586157	5,900
Perez Hilton	2024-08-16	http://twitter.com/PerezHilton/statuses/1824632168028483736	7,200
Perez Hilton	2025-01-16	https://x.com/ThePerezHilton/status/1880070359460020706	96,700
Queen Esther	2025-02-04	https://x.com/XOQueenEsther/status/1886578087665541323	70,900
Quin 4 Trump	2025-01-04	https://x.com/Quin4Trump/status/1875464778690265594	628
Real Melanie King	2025-02-16	https://x.com/realmelanieking/status/1891266207493378434	176,200

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Source	Date	Link	Impressions
Real Melanie King	2025-03-13	https://x.com/realmelanieking/status/1900258927658623415	688,300
Real Melanie King	2025-03-17	https://x.com/realmelanieking/status/1901796562453372967	71,700
RNN Royal News	2025-02-14	https://x.com/RNN_RoyalNews/status/1890609227661562169	110,500
Sage 1411	2025-01-16	https://x.com/sage1411/status/1878894977926570326	33,500
Sapien Assassin	2025-02-21	https://x.com/SapienAssassin/status/1892952603199148494	212,300
Sapien Assassin	2025-03-07	https://x.com/SapienAssassin/status/1898088493294780423	33,700
Sara Foxx 1	2025-02-17	https://x.com/SaraFoxx1/status/1891344404423536753	32,200
Shitty Shiv	2024-08-13	https://x.com/shittyshiv/status/1823418528613196145	306,000
Shnowyyy	2024-08-14	http://twitter.com/Shnowyyy/statuses/1823537881295561096	616,400
Spiritual Shift	2025-02-20	https://x.com/spiritualshift_/status/1892642914804891838	56,400
Spiritual Shift _	2025-01-23	https://x.com/spiritualshift_/status/1882494811082797256	242,900
Spiritual Shift _	2025-05-16	https://x.com/spiritualshift_/status/1923511620778766687	53,400
Spiritual Shift _	2025-02-15	https://x.com/spiritualshift_/status/1890902467451482579	22,900
Spiritual Shift _	2025-03-21	https://x.com/spiritualshift_/status/1903154642881745088	104,700
Stephanie Sidley	2025-02-17	https://x.com/StephanieSidley/status/1891357967468958093	1,700,000
The _ Real Nez	2025-01-01	http://twitter.com/The_Realnez/statuses/1874552901789692322	644
The Fab Book Lover	2025-03-31	https://x.com/TheFabBookLover/status/1906759687585800698	73,500
THR	2025-01-07	https://x.com/THR/status/1876758515433529750	195,900
THR	2025-01-08	https://x.com/THR/status/1877060201871978546	24,500
Tina Tweeker	2025-01-02	https://x.com/TinaTweeker/status/1874865743407247612	552
TMZ	2024-08-16	http://twitter.com/TMZ/statuses/1824491494167724352	40,200
TMZ	2025-01-25	https://x.com/TMZ/status/1883226938359022058	220,800

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Source	Date	Link	Impressions
Xoxo Audrey 4ever	2025-02-16	https://x.com/XoxoAudrey4ever/status/1891089973236924678	68,100
Xxsmnrsxx	2025-02-01	https://x.com/xxsmnrsxx/status/1885752064036229129	408,300
		X SUBTOTAL	**19,384,014**
Facebook			
All Time Entertainment	2025-08-21	https://www.facebook.com/watch/?v=987930903413569	4,600
Ben Shapiro	2025-02-06	https://www.facebook.com/watch/?v=633552612420383	43,000
Ben Shapiro	2025-01-17	https://www.facebook.com/officialbenshapiro/videos/will-blake-lively-ever-recover-from-this-with-megyn-kelly/616566590861296/	36,000
Ben Shapiro	2025-02-14	https://www.facebook.com/officialbenshapiro/videos/blake-lively-continues-to-dig-herself-into-a-hole/2429529180712860/	29,000
Cheezburger	2024-12-10	https://www.facebook.com/watch/?v=1150132443311732	320,000
Crazy Karens	2025-08-30	https://www.facebook.com/100093046995284/videos/megyn-kelly-slams-blake-lively-for-bullying-megynkellyshow-blakelively-ryanreyno/1847572355822851/	24,900
E! News	2025-01-08	https://www.facebook.com/enews/videos/blake-livelys-attorneys-slam-more-attacks-from-justin-baldonis-legal-team/1003866415140342/	49,000
ICONICHIPSTER.COM	2024-08-16	https://www.facebook.com/watch/?v=311838885289032	4,700
Mean Girl	2024-08-23	https://www.facebook.com/watch/?v=490346930291592	76,700
Megyn Kelly	2025-08-28	https://www.facebook.com/watch/?v=557839194016933	937,000
Megyn Kelly	2025-02-13	https://www.facebook.com/MegynKelly/videos/new-video-and-details-emerge-showing-serial-fraudster-blake-livelys-past-actions/637699522314364/	323,000
Megyn Kelly	2025-01-07	https://www.facebook.com/MegynKelly/videos/ryan-reynolds-and-blake-livelys-actions-and-why-they-will-get-sued-with-justin-b/8964328550324648/	1,300,000
Megyn Kelly	2025-06-11	https://www.facebook.com/MegynKelly/videos/she-is-not-in-a-good-position-she-cares-about-her-reputation-and-i-am-sure-she-w/1610208279651887/	246,000

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Source	Date	Link	Impressions
Perez Hilton	2025-07-25	https://www.facebook.com/watch/?v=2758485401028356	30,000
Perez Hilton	2025-08-20	https://www.facebook.com/PerezHilton/videos/blake-lively-effed-up-against-me-mistake-in-her-nevada-response-perez-hilton/2974425092742061/	169,000
Radar Online	2025-01-13	https://www.facebook.com/watch/?v=1739253666856399	573,600
The H3 Podcast	2025-02-13	https://www.facebook.com/theh3podcast/videos/throwback-to-blake-livelys-really-bizarre-interviews-these-interviews-both-surfa/1086045373278470/	1,300,000
The TV and Movie Queen	2024-09-11	https://www.facebook.com/watch/?v=534626182422209	6,700
TMZ	2025-01-28	https://www.facebook.com/TMZ/videos/heather-mcdonald-thinks-ryan-reynolds-is-the-real-bully-in-justin-blake-drama/1335387677480499/	1,400,000
		Facebook SUBTOTAL	**6,873,200**
Instagram			
Aliza Licht xo	2024-12-21	https://www.instagram.com/alizalichtxo/reel/DD2waqBR4BP/	95,500
Brittany Lyla Official	2024-08-14	https://www.instagram.com/reel/C-qnKqHJ3Qu/	1,599
Colonel Kurtz 99	2025-02-12	https://www.instagram.com/reel/DF9WBCZx-EY	33,000
Mean Girl Pod	2024-08-23	https://www.instagram.com/reel/C_Avus8p2lk/	85,100
Megyn Kelly Show	2025-08-28	https://www.instagram.com/megynkellyshow/reel/DN6aV3KkY3M/	481,000
No Filter with Zack	2024-12-27	https://www.instagram.com/nofilterwithzack/reel/DEGdtReSORr/	1,100,000
No Filter with Zack	2025-01-04	https://www.instagram.com/nofilterwithzack/reel/DEa9URQSdSy/	5,300,000
No Filter with Zack	2025-01-17	https://www.instagram.com/reel/DE7-4LsyNOP/	263,000
Sonnia Batta	2024-08-17	https://www.instagram.com/sonniabatta/reel/C-yCZvlP8MV/	540,000

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Source	Date	Link	Impressions
Steph With Da Deets	2025-03-13	https://www.instagram.com/reel/DHJOjZVOygz/	454,000
Zoe Unlimited	2024-09-29	https://www.instagram.com/reel/DAfJcZOJVjE/	368,000
Instagram SUBTOTAL			**8,721,199**
GRAND TOTAL			**176,738,781**

APPENDIX F – THE AT-ISSUE STATEMENTS

> "It is shameful that Ms. Lively and her representatives would make such **serious and categorically false accusations against Mr. Baldoni , Wayfarer Studios and its representatives**, as yet another desperate attempt to 'fix' her negative reputation which was garnered from her own remarks and actions during the campaign for the film; interviews and press activities that were observed publicly, in real time and unedited, which allowed for the internet to generate their own views and opinions.
>
> **These claims are completely false,** outrageous and intentionally salacious with an intent to publicly hurt and rehash a narrative in the media. Wayfarer Studios made the decision to proactively hire a crisis manager prior to the marketing campaign of the film, to work alongside their own representative with Jonesworks employed by Stephanie Jones, due to the multiple demands and threats made by Ms. Lively during production which included her threatening to not showing up to set, threatening to not promote the film, ultimately leading to its demise during release, if her demands were not met.
>
> It was also discovered that Ms. Lively enlisted her own representative, Leslie Sloan with Vision PR, who also represents Mr. Reynolds, to plant negative and completely fabricated and false stories with media, even prior to any marketing had commenced for the film, which was another reason why Wayfarer Studios made the decision to hire a crisis professional to commence internal scenario planning in the case they needed to address.
>
> The representatives of Wayfarer Studios still did nothing proactive nor retaliated, and only responded to incoming media inquiries to ensure balanced and factual reporting and monitored social activity.
>
> What is pointedly missing from the cherry-picked correspondence is the evidence that there were no proactive measures taken with media or otherwise; just internal scenario planning and private correspondence to strategize which is standard operating procedure with public relations professionals."[493]

> "After my clients filed a comprehensive lawsuit packed with almost 200 pages of undeniable facts and documentary evidence which crushed their false allegations of a smear campaign by providing doctored communications to the *New York Times*, **Blake and her legal team have just one heinous pivot left, and that is to double down on the revoltingly false sexual allegations against Mr. Baldoni,**" the hard hitting and media savvy attorney told Deadline."[494]

> "The mere fact that Ms. Lively feels that she can publicly destroy Mr. Baldoni's reputation in an attempt to devastate his future career and then deny him or his team their own ability to defend theirselves [sic] against her is preposterous. Mr. Baldoni never once publicly attempted to call

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[493] Freedman statement to the New York Times: See Statement to The New York Times from Bryan Freedman, attorney for Justin Baldoni, Wayfarer Studios and all its representatives, the New York Times (Dec. 21, 2024), https://www.nytimes.com/interactive/2024/12/21/us/statement-to-the-new-york-times.html.

[494] Freedman statement to Deadline: See Dominic Patten, Justin Baldoni's Lawyer Decries "Revoltingly False Sexual Allegations" From Blake Lively As Lawsuits Fly; Brands At Business Heart Of Dispute, Deadline (Jan. 18, 2025, 5:44 pm), https://deadline.com/2025/01/blake-lively-justin-baldoni-lawyer-latest-1236260673/.

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Ms. Lively out for her own many wrongdoings during filming, he kindly addressed all her concerns during filming in the correct manner despite the fact that he wholly disagreed, he himself was committed to do things differently and to keep the peace as she specifically admitted to in her own lawsuit. We will not only continue to defend our clients against **Blake's power, privilege and all out lies**, but we will now fight even harder for the voiceless in the DV community who are unfairly suffering while **she continues to push on her own self-serving and selfish vendetta in the media.**"[495]

"The irony is not lost on anyone that Ms. Lively is so petrified of the truth that she has moved to gag it," Freedman said in a statement to Page Six. "The immense power that she wielded in Hollywood built on pure fear of her husband and their powerful friends came to an end the moment Ms. Lively planned a mass distribution of a disturbingly false and well calculated hit piece in the New York Times."

"Ms. Lively did this with the sole intent to ruin the lives of innocent individuals, and then went the extra mile to place blame on a fictitious smear campaign, all because she quite simply could not accept that the public had organically seen through her facade."

"When you accuse innocent individuals of something so disturbing as sexual harassment without thinking of the destruction it would cause to not only them, but the entire domestic violence community, this is where accountability for such mean spirited actions must be taken," the message continued.

Freedman closed: "We will always respect the court; however, we will never be bullied by those suggesting we cannot defend our clients with pure, unedited facts. All we want is for people to see the actual text messages that directly contradict her allegations, video footage that clearly shows **there was no sexual harassment** and all the other powerful evidence that directly contradicts **any false allegations of sexual harassment** and subsequent smear campaign. It seems that in a time of universal deceit, telling the truth is a revolutionary act."[496]

BRYAN FREEDMAN: "It's -- I -- I've never seen it before, in my 30-plus-year career in Hollywood. And an executive producer is below a producer in the film world. An executive producer signed up to be an executive producer and -- and -- and that's it. And -- and an actress. And that's what she was supposed to be. As -- as the time progressed in this film, she decided that she wanted to be a producer. She, you know, applied to be a producer. She went and got, you -- you know, the dailies. She started to make edits. She wanted to be part of the editing team. There were people hired -- like human beings actually hired to do the editing job, who had done work as editors. She wanted to be part of that team. The next thing you know, she took over the editing. She started making threats that she wouldn't promote the movie, that she wanted to be in control of marketing of the movie, that she -- she would do nothing, in terms of promotion, unless she was the actual editor. She came up with her own cut of the film, which is -- you -- you know,

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[495] Freedman statement to Deadline: See Dominic Patten, Justin Baldoni's Lawyer Decries "Revoltingly False Sexual Allegations" From Blake Lively As Lawsuits Fly; Brands At Business Heart Of Dispute, Deadline (Jan. 18, 2025, 5:44 pm), https://deadline.com/2025/01/blake-lively-justin-baldoni-lawyer-latest-1236260673/.

[496] Freedman statement to Page Six: See BreAnna Bell, Justin Baldoni's lawyer says he won't be 'bullied' into silence by 'petrified' Blake Lively, Ryan Reynolds after gag order request, Page Six (Jan. 25, 2025, 4:45 pm), https://pagesix.com/2025/01/25/celebrity-news/justin-baldonis-lawyer-says-he-wont-be-bullied-into-silence-by-petrified-blake-lively-ryan-reynolds-after-gag-order-request/.

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> you have a director who has a cut, and she had a competing cut of the film. And -- and -- and for an executive producer to have a competing cut of a film is -- is incredibly bizarre. But when she starts threatening people and saying, I'm not going to promote the film, I'm not going to do anything unless you use my cut, that's when it starts to be awfully -- you know, awfully incendiary. And -- **and, you know,** and -- and **the concern really is that she used these allegations of sexual harassment, and she used these allegations of bullying to try and leverage her position so she could be the de facto director in the case**. And, you know, as you'll hear in the voice note, as you'll see in the evidence, she had Justin sitting in a basement in his own movie with his friends and family during the premiere of the movie, which should have been the biggest night of his career. He was sitting in the basement."[497]

Emphasis added throughout.

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[497] Freedman interview with Megyn Kelly: See Meg Storm, Exclusive: See Justin Baldoni's Text Messages with His 'It Ends with Us' Editors from Blake Lively Lawsuit (Jan. 7, 2005), MegynKelly.com, https://www.megynkelly.com/2025/01/07/justin-baldoni-text-messages-with-it-ends-with-us-editors-about-blake-lively/ (at 5:18).

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APPENDIX G – IMPRESSIONS MODEL

Source	Date	Link	Impressions
Online News			
Associated Press News	2024-12-21	https://apnews.com/article/blake-lively-justin-baldoni-harassment-complaint-10a90da60d7a325f33f3fa6bbf263e29	295,401
Business Insider	2024-12-21	https://www.businessinsider.com/blake-lively-sues-it-ends-with-us-costar-justin-baldoni-2024-12	240,970
Business Insider	2024-12-24	https://www.businessinsider.com/blake-lively-lawsuit-justin-baldoni-lawsuit-pr-law-experts-2024-12	240,970
Business Insider	2024-12-22	https://www.businessinsider.com/colleen-hoover-backs-blake-lively-on-instagram-justin-baldoni-lawsuit-2024-12	240,970
Business Insider	2024-12-21	https://www.businessinsider.com/blake-lively-lawsuit-against-justin-baldoni-5-bombshells-2024-12	240,970
Daily Mail	2024-12-23	https://www.dailymail.co.uk/news/article-14220065/Blake-Livelys-sister-breaks-silence-six-word-statement-Justin-Baldoni.html	234,185
Daily Mail	2024-12-23	https://www.dailymail.co.uk/news/article-14220641/Justin-Baldoni-wedding-apology-Blake-Lively.html	234,185
Daily Mail	2024-12-23	https://www.dailymail.co.uk/tvshowbiz/article-14221559/amber-heard-speaks-blake-lively-justin-baldoni-feud.html	234,185
E! Online	2024-12-22	https://www.eonline.com/news/1411454/blake-lively-sues-justin-baldoni-for-sexual-harassment	94,306
E! Online	2025-05-01	https://www.eonline.com/news/1416837/blake-lively-and-anna-kendricks-friendship-history	109,694
E! Online	2024-12-21	https://www.eonline.com/news/1411455/justin-baldoni-responds-to-blake-livelys-sexual-harassment-legal-complaint	94,306
E! Online	2024-12-21	https://www.eonline.com/news/1411456/blake-livelys-legal-complaint-against-justin-baldoni-includes-alleged-texts-about-smear-campaign	94,306

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Source	Date	Link	Impressions
E! Online	2024-12-23	https://www.eonline.com/news/1411460/blake-lively-gets-support-from-colleen-hoover-gwyneth-paltrow-and-more-amid-justin-baldoni-complaint	94,306
E! Online	2024-12-24	https://www.eonline.com/news/1411490/blake-lively-says-her-ryan-reynolds-kids-were-traumatized-by-alleged-justin-baldoni-smear-campaign	94,306
E! Online	2024-12-25	https://www.eonline.com/news/1411506/justin-baldoni-sued-by-former-publicist-days-after-blake-lively-complaint	94,306
E! Online	2024-12-22	https://www.eonline.com/news/1411457/justin-baldoni-dropped-by-talent-agency-after-blake-livelys-sexual-harassment-complaint	94,306
E! Online	2024-12-23	https://www.eonline.com/news/1411458/blake-livelys-complaint-against-justin-baldoni-mentions-hailey-bieber-leighton-meester-and-more	94,306
E! Online	2024-12-23	https://www.eonline.com/news/1411476/blake-lively-says-justin-baldoni-secretly-sent-her-to-weight-loss-specialist-instead-of-throat-doctor	94,306
E! Online	2024-12-24	https://www.eonline.com/news/1411499/blake-livelys-it-ends-with-us-costar-brandon-skelnar-breaks-silence-on-justin-baldoni-allegations	94,306
E! Online	2025-02-02	https://www.eonline.com/news/1412872/justin-baldoni-reveals-texts-from-ryan-reynolds-in-newly-launched-website	90,603
Entertainment Weekly	2024-12-22	https://ew.com/blake-lively-sisterhood-of-the-traveling-pants-costars-offer-support-8765649	104,191
Entertainment Weekly	2024-12-23	https://ew.com/amber-heard-blake-lively-justin-baldoni-johnny-depp-crisis-firm-8765866	104,191
Entertainment Weekly	2024-12-21	https://ew.com/blake-lively-accuses-justin-baldoni-sexual-harassment-retaliation-it-ends-with-us-8765519	104,191
Entertainment Weekly	2024-12-28	https://ew.com/comedian-hannah-berner-clarifies-timing-of-netflix-blake-lively-joke-8767167	104,191
Hollywood Reporter	2024-12-21	https://www.hollywoodreporter.com/movies/movie-news/blake-lively-sues-justin-baldoni-sexual-harassment-1236092214/	10,062

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Source	Date	Link	Impressions
Page Six	2025-01-25	https://pagesix.com/2025/01/25/celebrity-news/justin-baldonis-lawyer-says-he-wont-be-bullied-into-silence-by-petrified-blake-lively-ryan-reynolds-after-gag-order-request/	125,061
		Online News SUBTOTAL	**3,559,144**
TV			
ABC	2024-12-24	https://archive.org/details/KGO_20241224_150000_Good_Morning_America/start/2340/end/2400	2,456,000
ABC	2024-12-24	https://archive.org/details/KGO_20241224_083700_Nightline/start/323/end/383	840,000
ABC	2024-12-23	https://archive.org/details/KGO_20241224_050000_ABC_World_News_Tonight_With_David_Muir/start/1017/end/1077	7,118,000
BBC News America	2024-12-23	https://archive.org/details/KQED_20241223_223000_BBC_News_America/start/978/end/1038	115,000
CBS	2024-12-23	https://archive.org/details/KPIX_20241223_113000_CBS_News_Mornings/start/988/end/1048	1,823,000
CNN	2024-12-23	https://archive.org/details/CNNW_20241223_180000_CNN_News_Central/start/2201/end/2261	307,000
CNN	2024-12-23	https://archive.org/details/CNNW_20241223_200000_CNN_News_Central/start/2838/end/2898	307,000
CNN	2024-12-23	https://archive.org/details/CNNW_20241223_140000_CNN_News_Central/start/3350/end/3410	307,000
CNN	2024-12-23	https://archive.org/details/CNNW_20241223_160000_CNN_Newsroom_With_Pamela_Brown/start/2594/end/2654	379,000
CNN	2024-12-23	https://archive.org/details/CNNW_20241223_210000_The_Lead_With_Jake_Tapper/start/3253/end/3313	576,000
CNN	2024-12-23	https://archive.org/details/CNNW_20241224_060000_The_Source_With_Kaitlan_Collins/start/2712/end/2772	400,000

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Source	Date	Link	Impressions
FOX	2025-01-05	https://archive.org/details/FOXNEWSW_20250105_160000_MediaBuzz/start/3350/end/3410	1,200,000
MSNBC	2024-12-24	https://archive.org/details/MSNBCW_20241224_130000_Jonathan_Lemire_Reports/start/4843/end/4903	398,000
MSNBC	2025-01-02	https://archive.org/details/MSNBCW_20250102_110000_Morning_Joe/start/13961/end/14021	647,000
MSNBC	2024-12-23	https://archive.org/details/MSNBCW_20241223_110000_Morning_Joe/start/13069/end/13129	647,000
MSNBC	2024-12-24	https://archive.org/details/MSNBCW_20241224_190000_MSNBC_Reports/start/2029/end/2089	235,000
MSNBC	2024-12-23	https://archive.org/details/MSNBCW_20241223_150000_MSNBC_Reports/start/2479/end/2539	235,000
MSNBC	2024-12-24	https://archive.org/details/MSNBCW_20241224_150000_MSNBC_Reports/start/2167/end/2227	235,000
MSNBC	2024-12-23	https://archive.org/details/MSNBCW_20241223_190000_MSNBC_Reports/start/3284/end/3344	235,000
NBC	2024-12-23	https://archive.org/details/KNTV_20241223_110000_Early_Today/start/860/end/920	340,000
NBC	2025-01-17	https://archive.org/details/KNTV_20250117_120000_Early_Today/start/1171/end/1231	340,000
NBC	2025-01-17	https://archive.org/details/KNTV_20250117_123000_Early_Today/start/1206/end/1266	340,000
NBC	2024-12-23	https://archive.org/details/KNTV_20241223_200000_NBC_News_Daily/start/537/end/597	1,300,000
NBC	2024-12-22	https://archive.org/details/KNTV_20241222_233000_NBC_Nightly_News_With_Lester_Holt/start/941/end/1001?q=baldoni+categorically+flse	6,209,000
NBC	2024-12-21	https://archive.org/details/KNTV_20241222_013000_NBC_Nightly_News_With_Lester_Holt/start/963/end/1023	6,209,000

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Source	Date	Link	Impressions
NBC	2024-12-22	https://archive.org/details/KNTV_20241222_140000_Sunday_Today_With_Willie_Geist/start/664/end/724	2,364,000
NBC	2025-01-02	https://archive.org/details/KNTV_20250102_150000_Today/start/2540/end/2600	2,538,000
NBC	2025-01-04	https://archive.org/details/KNTV_20250104_130000_Today/start/1448/end/1508	2,538,000
NBC	2024-12-23	https://archive.org/details/KNTV_20241223_150000_Today/start/2065/end/2125	2,538,000
NBC	2024-12-24	https://archive.org/details/KNTV_20241224_150000_Today/start/2031/end/2091	2,538,000
		TV SUBTOTAL	**45,714,000**

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Source	Date	Link	Impressions
TikTok			
BBC News	2024-12-24	https://www.tiktok.com/@bbcnews/video/7451985672899956001	180,600
BBC News	2024-12-22	https://www.tiktok.com/@bbcnews/video/7451210617886657825	292,000
BBC Sounds	2025-08-02	https://www.tiktok.com/@bbcsounds/video/7533911319473442070	18,700
CBS Evening News	2024-12-22	https://www.tiktok.com/@cbseveningnews/video/7451081663871782174	6,700,000
CBS Mornings	2024-12-24	https://www.tiktok.com/@cbsmornings/video/7452021745466248479	119,400
CBS Mornings	2024-12-23	https://www.tiktok.com/@cbsmornings/video/7451652879745551646	162,000
CBS News	2024-12-23	https://www.tiktok.com/@cbsnews/photo/7451639491195850026	531,800
clipcrzy4yt	2024-12-21	https://www.tiktok.com/@clipcrzy4yt/video/7450879312267627822	16,000
Daily Mail	2024-12-21	https://www.tiktok.com/@dailymail/video/7450903492358573358	5,100,000
Daily Mail	2024-12-23	https://www.tiktok.com/@dailymail/video/7451645843662310702	7,400,000
devotedly.yours	2024-12-21	https://www.tiktok.com/@devotedly.yours/video/7450891208806763806	424,600
Emily Schwartz	2024-12-21	https://www.tiktok.com/@emilycschwartz/video/7450875551658675487	544,900
Entertainment Tonight	2024-12-22	https://www.tiktok.com/@entertainmenttonight/video/7451359051604069662	4,200,000
Entertainment Tonight	2024-12-21	https://www.tiktok.com/@entertainmenttonight/video/7450885088042028318	10,200,000
Good Morning America	2024-12-23	https://www.tiktok.com/@gma/video/7451599200367676718	52,500
Good Morning America	2024-12-26	https://www.tiktok.com/@gma/video/7452703985708043566	516,300
Mandy Kay Schendel	2024-12-23	https://www.tiktok.com/@mandykayschendel/video/7451818880177098026	165,300
MSNBC	2024-12-23	https://www.tiktok.com/@msnbc/video/7451784725477281066	178,600
NBC News	2024-12-22	https://www.tiktok.com/@nbcnews/video/7451272514296237354	500,400

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Source	Date	Link	Impressions
People	2024-12-21	https://www.tiktok.com/@people/video/7450882344799505694	3,500,000
Rob and Haley	2024-12-23	https://www.tiktok.com/@robandhaley/video/7451721565428796714	467,400
Steph With Da Deets	2025-01-19	https://www.tiktok.com/@stephwithdadeets/video/7461764522626354474	131,300
The News Movement	2024-12-24	https://www.tiktok.com/@thenewsmovement/photo/7451980065379831070	39,000
The Simply Simone	2024-12-21	https://www.tiktok.com/@thesimplysimone/video/7450879640308075818	103,300
		TikTok SUBTOTAL	**41,544,100**
YouTube			
Access Hollywood	2024-12-23	https://www.youtube.com/watch?v=lArht7dBUg8	2,661
Access Hollywood	2024-12-22	https://www.youtube.com/watch?v=QOhmvhKXYso	17,000
Brute India	2024-12-23	https://www.youtube.com/watch?v=SsSBYw83TJs	194,396
CNN	2024-12-23	https://youtu.be/6GYhQEvaqn0?t=70	85,443
Dave Neal	2025-01-19	https://www.youtube.com/watch?v=ct9JVSbQVKI	48,083
E! News	2024-12-22	https://www.youtube.com/watch?v=78kPeD4ZRw8	206,261
E! News	2024-12-21	https://www.youtube.com/watch?v=vHqce01-zg0	330,000
E! News	2024-12-24	https://www.youtube.com/watch?v=zw35Hd9J6YU	128,859
Law&Crime Network	2025-01-06	https://www.youtube.com/watch?v=xRKuEAppEuM	629,125
Law&Crime Network	2024-12-23	https://www.youtube.com/watch?v=YXl_5OMypV8	461,728
Megyn Kelly	2025-01-07	https://www.youtube.com/watch?v=0wAH6PllOOY	1,100,000
Megyn Kelly	2025-01-07	https://www.youtube.com/watch?v=Q4yniMqrlgI	705,457
NBC News	2024-12-21	https://www.youtube.com/shorts/oBJonkSs-VA	34,215

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Source	Date	Link	Impressions
NBC News	2024-12-24	https://www.youtube.com/watch?v=-qcRGWgL9Ow&lc=	64,228
TODAY	2024-12-23	https://www.youtube.com/watch?v=0E3Q9POxssA	75,122
Us Weekly	2025-01-01	https://www.youtube.com/watch?v=5CFen30FRNQ	1,503
Us Weekly	2025-01-03	https://www.youtube.com/watch?v=BuUMD-0jhrw	1,585
Us Weekly	2024-12-23	https://www.youtube.com/watch?v=juB77OYTx08	11,632
Us Weekly	2024-12-24	https://www.youtube.com/watch?v=Q4rmrn3Qa3c	8,477
Us Weekly	2025-01-02	https://www.youtube.com/watch?v=QBo6tK9qRaA	14,875
Us Weekly	2024-12-30	https://www.youtube.com/watch?v=qMrb3FT2gDY	3,935
Us Weekly	2024-12-23	https://www.youtube.com/watch?v=So60ehEvhHE	1,463
Us Weekly	2024-12-23	https://www.youtube.com/watch?v=veBwSaOWvr8	1,409
Us Weekly	2024-12-24	https://www.youtube.com/watch?v=ZeBhfJcEg88	2,162
		YouTube SUBTOTAL	**4,129,619**
X			
Daily Mail	2025-01-18	https://x.com/Daily_MailUS/status/1880826420470907035/photo/1	4,000
Deadline	2025-01-18	https://x.com/DEADLINE/status/1880793360899928302	15,800
Dharaura1	2025-01-19	https://x.com/Dharaura1/status/1880917106755281147	513
filmfare	2024-12-22	https://x.com/filmfare/status/1870715270828101681?lang=ar	4,465
Jameslb157	2025-01-19	https://x.com/jameslb157/status/1880829684499534100	1558
Newsini	2025-01-19	https://x.com/NewsiniApp/status/1880798070654263432	289
Newsini	2025-01-19	https://x.com/NewsiniApp/status/1880798399227732206	299
PageSix	2025-01-25	https://x.com/PageSix/status/1883270538228879375	293,900
PopBase	2024-12-21	https://x.com/PopBase/status/1870478849341071388?lang=en	4,500,000
Smithson_kit	2025-01-19	https://x.com/smithson_kit/status/1880998052674306307	1,556

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Source	Date	Link	Impressions
TaraBull808	2024-12-21	https://x.com/TaraBull808/status/1870553149456679090	182,000
TheAnchor	2025-01-19	https://x.com/theanchoragent/status/1880802279412117607	319
Variety	2024-12-21	https://x.com/Variety/status/1870483480314073476	159,900
WeSmirch	2025-01-19	https://x.com/WeSmirch/status/1881007545201946958	376
Zain72170560	2025-01-19	https://x.com/Zain72170560/status/1880809849019339246	232
		X SUBTOTAL	5,165,207
Facebook			
951 The River	2024-12-23	https://www.facebook.com/951theriver/posts/justin-baldoni-responds-to-blake-livelys-sexual-harassment-lawsuit-claims-as-cat/1410061300335543	45
Access Hollywood	2024-12-22	https://www.facebook.com/accesshollywood/videos/1316310812717897/	13,000
Access Hollywood	2024-12-23	https://www.facebook.com/accesshollywood/videos/sisterhood-of-the-traveling-pants-stars-send-blake-lively-support-amid-justin-ba/1114947313112079/	22,000
Access Hollywood	2025-01-01	https://www.facebook.com/accesshollywood/videos/blake-lively-files-lawsuit-against-justin-baldoni-as-it-ends-with-us-director-su/1110127863711567/	20,000
Babe	2024-12-23	https://www.facebook.com/babedotnet/posts/his-lawyer-said-the-allegations-are-categorically-false/994293329407439/	35,538
BBC News	2024-12-23	https://www.facebook.com/bbcnews/posts/according-to-a-legal-filing-lively-accused-mr-baldoni-and-his-team-of-attacking-/1052670260230299/	1,548,462
BBC News	2024-12-22	https://www.facebook.com/bbcnews/posts/justin-baldonis-legal-team-told-the-bbc-the-allegations-are-categorically-false/1051643793666279/	1,548,462
BBC Sounds	2025-08-02	https://www.facebook.com/reel/1084994890398387	19,546
CBS Mornings	2024-12-23	https://www.facebook.com/reel/1109563714137257	57,000
CBS Mornings	2024-12-23	https://www.facebook.com/CBSMornings/videos/blake-lively-accuses-it-ends-with-us-costar-of-sexual-harassment-in-complaint/1122133892687378/	81,231
E! News	2025-01-27	https://www.facebook.com/enews/videos/blake-lively-seen-for-first-time-in-over-a-month-amid-justin-baldoni-legal-battl/643375904712687/	88,000

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Source	Date	Link	Impressions
E! News	2025-02-17	https://www.facebook.com/enews/videos/is-it-ends-with-us-brandon-sklenar-team-blake-lively-or-team-justin-baldoni/1140894497508977/	108,000
Entertainment Tonight	2024-12-22	https://www.facebook.com/reel/609562528278138	216,000
Entertainment Tonight	2024-12-21	https://www.facebook.com/reel/2280469348992243	533,000
Entertainment Tonight	2024-12-23	https://www.facebook.com/EntertainmentTonight/videos/inside-blake-livelys-lawsuit-against-co-star-justin-baldoni/1724818111632019/	1,400,000
Firstpost	2024-12-23	https://www.facebook.com/reel/766173042380609	91,385
Firstpost	2024-12-23	https://www.facebook.com/reel/586566113964776	91,385
Good Morning America	2024-12-24	https://www.facebook.com/GoodMorningAmerica/videos/blake-lively-has-filed-a-complaint-accusing-her-costar-and-director-justin-baldo/1307622876924048/	10,000
Law and Crime	2024-12-23	https://www.facebook.com/lawandcrime/videos/13-shocking-details-in-blake-livelys-sexual-harassment-complaint/566580773001444/	24,000
Miz Hollywd	2024-12-21	https://www.facebook.com/mizhollywd/photos/blake-lively-has-accused-her-it-ends-with-us-director-and-co-star-justin-baldoni/1164169255434019/?_rdr	124
PARADE Magazine	2024-12-21	https://www.facebook.com/parademag/posts/a-lawyer-for-baldoni-called-livelys-accusations-categorically-false/957387832912988/	7,742
Pop Factions	2024-12-21	https://www.facebook.com/PopFactions/posts/justinbaldonis-lawyer-calls-blakelivelys-lawsuit-a-desperate-attempt-to-fix-her-/1324733421943030/	736
The Independent	2024-12-23	https://www.facebook.com/photo/?fbid=1065061215649871&set=pcb.1065061338983192	253,846
The Perez Hilton	2024-12-21	https://www.facebook.com/ThePerezHilton/videos/-justinbaldoni-blakelively-ryanreynolds/1558849575517041/	6,600
The West Australian	2024-12-22	https://www.facebook.com/thewestaustralian/posts/justin-baldonis-lawyer-has-accused-blake-lively-of-making-categorically-false-ac/914056987500172/	10,078

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Source	Date	Link	Impressions
WNBJ39	2024-12-24	https://www.facebook.com/wnbj39/videos/hollywood-is-shaken-as-blake-lively-accuses-co-star-justin-baldoni-of-sexual-har/1595015161116421/	185
WORK180	2024-12-24	https://www.facebook.com/work180official/posts/in-a-statement-to-tmz-blake-lively-says-i-hope-that-my-legal-action-helps-pull-b/1168395585289579/	305
Yahoo Entertainment	2024-12-21	https://www.facebook.com/photo.php?fbid=972430338090827&id=100059716081151&set=a.653248480009016	93,923
		Facebook SUBTOTAL	**6,280,592**
Instagram			
abcnews_au	2024-12-22	https://www.instagram.com/p/DD5nbJ9Tyba/	72,000
abcnews_au	2025-05-12	https://www.instagram.com/p/DJkrLNMzSFc/?img_index=8	72,000
accesshollywood	2024-12-25	https://www.instagram.com/p/DD5jy2WPri9/?hl=en	102,000
accesshollywood	2024-12-23	https://www.instagram.com/p/DD76aQ_MDjE/	102,000
alizalichtxo	2024-12-21	https://www.instagram.com/reel/DD2SmJ_x9o_/	37,900
apnews	2024-12-21	https://www.instagram.com/p/DD2WvRAJvqa/	96,000
bbcnews	2024-12-23	https://www.instagram.com/bbcnews/p/DD61A_gxrS3/	1,764,000
bbcnews	2024-12-23	https://www.instagram.com/bbcnews/reel/DD7hZFWs10o/	1,700,000
BBCsounds	2025-08-02	https://www.instagram.com/reel/DM2MWIvosWM/	33,900
bravo_boo	2024-12-21	https://www.instagram.com/reel/DD2Q_RFvmQm/	39,900
businessinsider	2024-12-24	https://www.instagram.com/p/DD95UpjxLzz/	198,000
cablgram	2024-12-22	https://www.instagram.com/p/DD46s7PvBKK/	3,372
cbsmornings	2024-12-24	https://www.instagram.com/reel/DD9-2ZSO_-j/	45,400
cbsmornings	2024-12-23	https://www.instagram.com/reel/DD7bUNBu6lH/	87,200
cbsnews	2024-12-23	https://www.instagram.com/p/DD7UG8lRlYG/	150,000
cbsnews	2024-12-22	https://www.instagram.com/cbsnews/p/DD3EmczyGkD/	150,000

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Source	Date	Link	Impressions
entertainmenttonight	2024-12-21	https://www.instagram.com/p/DD2M87iTWKs/	396,000
entertainmenttonight	2024-12-21	https://www.instagram.com/p/DD2nu0hPo1u/	396,000
entertainmenttonight	2024-12-23	https://www.instagram.com/p/DD7QJ4RTZNn/	396,000
entertainmenttonight	2024-12-31	https://www.instagram.com/p/DEP1ts4M5ka/	396,000
entertainmenttonight	2024-12-22	https://www.instagram.com/reel/DD5ZR33sCkp/	928,000
entertainmenttonight	2024-12-21	https://www.instagram.com/reel/DD2PtezBIF2/	628,000
etalkctv	2024-12-21	https://www.instagram.com/p/DD2dy4yJr7H/	24,300
goodmorningamerica	2024-12-26	https://www.instagram.com/goodmorningamerica/reel/DECtMZ4ON0n/?locale=en	716,000
hollywoodlife	2024-12-28	https://www.instagram.com/p/DEIOfgAt-hg/	84,000
hollywoodlife	2024-12-26	https://www.instagram.com/p/DED48-vS6SY/	84,000
hollywoodreporter	2024-12-21	https://www.instagram.com/hollywoodreporter/p/DD2CRC8zQ8J/?hl=en	168,000
hollywoodreporter	2024-12-21	https://www.instagram.com/p/DD2CRC8zQ8J/	168,000
kaleidoscopenews	2024-12-21	https://www.instagram.com/p/DD24C3STSG0/	2,538
mwnlifestyle	2024-12-22	https://www.instagram.com/mwnlifestyle/p/DD4Rt4QOxUv/	1,698
nbcnews	2024-12-21	https://www.instagram.com/p/DD2nkpdhvw8/	258,000
paperazzi	2024-12-21	https://www.instagram.com/p/DD2Uf66NLSk/	43,560
pedestriantv	2024-12-21	https://www.instagram.com/pedestriantv/p/DD3YGJIT-zx/	10,800
popfaction	2024-12-21	https://www.instagram.com/p/DD2CHc0Rw6o/	36,600

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Source	Date	Link	Impressions
scoopwhoop	2024-12-24	https://www.instagram.com/p/DD9VPtJoCuo/	144,000
skynews	2024-12-21	https://www.instagram.com/p/DD2vZe_vbNo/	156,000
Stephwithdadeats	2025-01-19	https://www.instagram.com/reel/DFBnsy2OSLU/	87,900
thedailybeast	2024-12-24	https://www.instagram.com/thedailybeast/p/DD-FEB9zWMg/	28,320
thenewsmovement	2024-12-24	https://www.instagram.com/p/DD9sKRTqaHc/	6,960
TMZ.TV	2024-12-24	https://www.instagram.com/p/DD7sSEjNq3s/	288,000
tribunedit	2024-12-24	https://www.instagram.com/p/DD9UvmFIssV/	20,820
usatoday	2024-12-23	https://www.instagram.com/p/DD78rLfTpro/?img_index=2	222,000
variety	2024-12-21	https://www.instagram.com/p/DD2KmDXs4gK/	162,000
voxdotcom	2025-01-16	https://www.instagram.com/p/DE5UTTjMSwy/	59,700
Instagram SUBTOTAL			10,566,868
GRAND TOTAL			116,959,530

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APPENDIX H – DAMAGES MODEL

3x Attitude Change Multiplier

Original Defamatory Impressions:[498] 116,959,530
Attitude Change Multiplier:[499] 3x
Receptivity Rate:[500] 55%
Impression Rates: TikTok[501] (12%), Instagram, Facebook,[502] and Twitter[503] (6%), YouTube[504] (100%)

Impression Source	Original Defamatory Impressions[505]	Discounted Impressions[506]	Target Impressions[507]	Adjusted Target Impressions[508]	CPM[509]	Total Cost[510]
Online News	3,559,144	1,964,647	5,893,942	5,893,942	$10.00[511]	$58,939
TV	45,714,000	25,234,128	75,702,384	75,702,384	$10.00[512]	$757,024
TikTok Influencer	41,544,100	22,932,343	68,797,030	537,476,794	$10.00[513]	$5,374,768
YouTube Influencer	4,129,619	2,279,550	6,838,649	6,838,649	$45.00[514]	$307,739
X Influencer	5,165,207	2,851,194	8,553,583	142,559,713	$2.00[515]	$285,119
Facebook Influencer	6,280,592	3,466,887	10,400,661	173,344,350	$20.00[516]	$3,466,887
Instagram Influencer	10,566,868	5,832,911	17,498,733	291,645,557	$15.00[517]	$4,374,683
	116,959,530	64,561,661	193,684,982	1,233,461,389		$14,625,160

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[498]   The impressions estimate from the Impressions Model, see Appendix G.
[499]   Discussed in Section XI A iv.
[500]   https://today.yougov.com/topics/entertainment/explore/actor/Blake_Lively.

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[501] One study conducted by Rival IQ analyzed 374,000 videos posted on TikTok between January and December 2023 from over 2,000 active TikTok handles with a minimum of 1,000 followers across 14 different content industries including beauty, media, influencers, sports and higher education. The study found a median of 12.8 views per 100 followers per video which I rely on in my analysis as a benchmark rate of views per follower. See, https://www.rivaliq.com/blog/tiktok-benchmark-report/#title-views-per-follower. Rival IQ is a social media analytics and competitive benchmarking tool that businesses use to assess media performance. Rival IQ provides metrics and profile and post tracking on Instagram, Facebook, Twitter, YouTube, and TikTok https://www.rivaliq.com/product/.

[502] Rival IQ conducted a study to measure follower engagement on Instagram by analyzing over 125,000 Instagram stories and over 539,000 frames posted between June and November 2023. The study included 1,470 Instagram handles with a minimum of 1,000 followers and at least one Story published during each month of the time frame. For non-Story posts, the reach rate — the number of viewers of a post divided by the number of followers of that account, expressed as a percentage — for accounts with fewer than 10,000 followers was 19%, 10% for accounts with 10,000 to 50,000 followers, 7% for the 50,000 to 200,000 follower range, and 6% for accounts with over 200,000 followers. See, https://www.rivaliq.com/blog/instagram-stories-benchmark-report/#title-stories-reach-rate; *see also:* https://www.rivaliq.com/blog/instagram-stories-benchmark-report/#title-methodology, https://www.socialinsider.io/social-media-benchmarks/instagram. I have relied on an impressions rate of 6%, as the majority of posts included in my Impressions Model are from accounts with greater than 200,000 followers. As a conservative measure, Facebook is assumed to be the same as Instagram despite the observed 2.5% impressions rate among the posts containing Mr. Freedman's At-Issue Statements.

[503] Impression rates can vary widely by post, with some X posts garnering tens of thousands of impressions and others from the same account getting only a few hundred. Overall, research has found that impression rates on X are estimated at between 1.3% to 2.6% for typical users, though the range can vary widely depending on numerous factors. Buzzfeed had an average 22% rate, but X suggested 30% may be reached. See, *How to calculate Twitter Impressions and Reach*, TweetBinder Blog, https://www.tweetbinder.com/blog/twitter-impressions/; Keith Peterson, *What Does Impressions Mean on Twitter – Trigger Visibility Through Impressions*, Marx Communications (Mar. 15, 2023), https://marxcommunications.com/what-does-impressions-mean-on-twitter/. See also, Wang, L., Ramachandran, A., & Chaintreau, A. (2016). Measuring Click and Share Dynamics on Social Media: A Reproducible and Validated Approach. Proceedings of the International AAAI Conference on Web and Social Media, 10(2), 108-113; and Garett Sloane, *Twitter Tells Brands They Can Reach 30% of Their Followers for Free*, Adweek (July 11, 2014), https://www.adweek.com/performance-marketing/twitter-tells-brands-they-can-reach-30-their-followers-free-158886/ (accessed at: https://archive.is/vpdEs), https://www.quintly.com/blog/twitter-impressions-and-reach-definition-and-how-to-track, https://martech.org/facebook-twitter-impressions/. The at-issue X posts had an average impressions rate of 1.8%, squarely in the expected range listed above. To be conservative in calculating corrective costs, however, I have applied the same 6% impression rate as on Facebook and Instagram for pricing X posts in the corrective campaign.

[504] I was not able to identify an impressions rate for YouTube influencers. Accordingly, to be conservative, I assume a 100% impression rate in my calculation.

[505] These are the output of the Impressions Model, see Appendix G.

[506] The number of impressions discounted by the 55% receptivity rate.

[507] The number of impressions allocated to the media type calculated using the following formula: Discounted Impressions * Attitude Change Multiplier.

[508] The number of impressions allocated to the media type, taking into account the impression rate.

[509] Ad cost per 1,000 impressions.

[510] Costs were calculated using the following formula: (Adjusted Impressions / 1000) * CPM.

[511] CPM cost is based on the midpoint of Native Ads. https://newormedia.com/blog/cpm-benchmarks-by-the-industry/.

[512] CPM cost is based on 30-second TV commercial price. See, https://keynesdigital.com/ctv-advertising-rates/ and https://oaaa.org/wp-content/uploads/2022/10/2022_01-Solomons-US-Major-Media-CPM-ComparisonvOAAA.pdf.

[513] CPM cost is based on > 1 million follower accounts. https://www.modash.io/blog/tiktok-pricing-guide.

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5x Attitude Change Multiplier

Original Defamatory Impressions: 116,959,530
Attitude Change Multiplier: 5
Receptivity Rate: 55%
Impression Rates: TikTok (12%), Instagram, Facebook and Twitter (6%), YouTube (100%)

Impression Source	Original Defamatory Impressions	Discounted Impressions	Target Impressions	Adjusted Target Impressions	CPM	Total Cost
Online News	3,559,144	1,964,647	9,823,237	9,823,237	$10.00	$98,232
TV	45,714,000	25,234,128	126,170,640	126,170,640	$10.00	$1,261,706
TikTok Influencer	41,544,100	22,932,343	114,661,716	895,794,656	$10.00	$8,957,947
YouTube Influencer	4,129,619	2,279,550	11,397,748	11,397,748	$45.00	$512,899
X Influencer	5,165,207	2,851,194	14,255,971	237,599,522	$2.00	$475,199
Facebook Influencer	6,280,592	3,466,887	17,334,435	288,907,250	$20.00	$5,778,145
Instagram Influencer	10,566,868	5,832,911	29,164,556	486,075,928	$15.00	$7,291,139
	116,959,530	64,561,661	322,808,304	2,055,768,982		$24,375,267

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[514]   CPM cost is based on the midpoint of 1M+ subscriber accounts. https://www.modash.io/blog/youtube-influencer-pricing.
[515]   https://sproutsocial.com/insights/influencer-pricing/.
[516]   https://sproutsocial.com/insights/influencer-pricing/.
[517]   CPM cost is based on > 1 million follower accounts. https://www.modash.io/blog/tiktok-pricing-guide.

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