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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,)
))
Plaintiff,) Civil Action No.
))
vs.) 1:24-cv-10049-LJL
))
WAYFARER STUDIOS LLC, a) (Consolidated for
Delaware Limited Liability) pretrial purposes
Company, JUSTIN BALDONI, an) with
Individual, JAMEY HEATH, an) 1:25-cv-00449-LJL
Individual, STEVE SAROWITZ, an) Rel:
Individual, IT ENDS WITH US) 1:25-cv-00779-LJL
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.)

VIDEOCONFERENCE DEPOSITION OF
ASHLEE HUMPHREYS, Ph.D.
November 25, 2025

Stenographically Reported by:
ANDREW R. PITTS, CSR, RPR

1 (Whereupon, the following proceedings
2 were held via videoconference.)

3 TECH ASSISTANT: The time is now
4 9:03 a.m. Central. We are now going on the
5 record.

6 (Whereupon, the witness was
7 administered an oath.)

8 ASHLEE HUMPHREYS,
9 called as a witness herein, having been first
10 administered an oath, was examined and testified
11 remotely via videoconference as follows:

12 EXAMINATION

13 BY MR. SCHUSTER:

14 Q. Good morning, everyone. Good morning,
15 Dr. Humphreys.

16 A. Good morning.

17 Q. My name is Mitchell Schuster. I am an
18 attorney at the law firm of Meister Seelig & Fein,
19 and I represent the Defendants in this action that
20 has brought us together this morning. I am going to
21 ask you a series of questions throughout the day.
22 Hopefully it won't run into the end of the day, but
23 I will do my best to be as efficient as possible.

24 Have you ever been deposed before?

25 A. Yes.

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1 Q. Did you do that?

2 A. Yes.

3 Q. So you said "introducing new negative
4 associations," and you refer to Mr. Freedman's
5 statements about her lying in a government document,
6 and then you go on to say "and/or strengthen
7 existing negative associations."

8 Were there existing negative associations
9 with her in the public sphere?

10 A. Yes.

11 Q. What were the existing negative
12 associations about Blake Lively that were
13 strengthened by Mr. Freedman?

14 A. I would need to go point you to the impact
15 analysis, but at a high level, I believe it's the
16 association that she was a bully and some of the
17 other associations that are congruent with the
18 alleged retaliation campaign.

19 Q. Was Mr. Freedman -- do you recall
20 Mr. Freedman -- withdrawn.

21 Do you recall reading that Mr. Freedman
22 referred to Blake Lively as a bully?

23 A. Yes, I believe that is in one of the
24 statements, although we could go check to confirm.

25 Q. Okay. Do you know if Blake Lively ever

1 part of a retaliatory campaign?

2 A. So what I can tell you based on
3 Dr. Mayzlin's findings is that the phrase tone deaf
4 experienced a dramatic uptick in the month of August
5 and I believe again in December. And that
6 corresponded, again in Dr. Mayzlin's report, with the
7 alleged dates of the retaliatory campaign.

8 BY MR. SCHUSTER:

9 Q. Okay. Do you have any opinion as to
10 whether a third party who uses the word tone deaf is
11 participating in a retaliation campaign?

12 MS. BENDER: Objection.

13 BY THE WITNESS:

14 A. I can tell you at the aggregate level, the
15 term tone deaf increased dramatically during that
16 period.

17 BY MR. SCHUSTER:

18 Q. Do you know the person who used the term
19 tone deaf?

20 A. Which person?

21 Q. The one in the post we were just talking
22 about.

23 A. So if someone used the term tone deaf -- and
24 they have, and I can't find the exact post right
25 now -- and that person -- what proof, if any, do you

1 have, not Dr. Mayzlin, what proof, if any, do you
2 have that that poster was participating in the
3 retaliation campaign allegedly initiated by the
4 Defendants?

5 MS. BENDER: Objection.

6 BY THE WITNESS:

7 A. So as I testified previously, I do not offer
8 an opinion on the retaliatory campaign itself. I can
9 tell you that the dramatic increase in the term tone
10 deaf occurred in that period as cited in
11 Dr. Mayzlin's report, and I can tell you from my
12 impact analysis that that association caused
13 reputational harm.

14 BY MR. SCHUSTER:

15 Q. Okay. But if the tone deaf was caused by
16 Blake Lively, isn't the reputational harm her
17 problem?

18 MS. BENDER: Objection.

19 BY THE WITNESS:

20 A. I don't -- I don't offer an opinion on that
21 matter.

22 BY MR. SCHUSTER:

23 Q. Are you aware that Ms. Lively was the
24 reason for an assistant director who worked on her
25 film A Simple Favor for quitting her job and that

1 statements; one is my analysis of the alleged
2 retaliatory campaign.

3 The plantation association is not relevant
4 to my assessment of Mr. Freedman's statements because
5 I base the damages purely on his statements alone and
6 the damage to his statements alone.

7 Regarding part 1, as we spoke about earlier,
8 prior associations with Ms. Lively were kind of built
9 into that before time period in Dr. Mayzlin's
10 analysis, and so we're comparing that before period
11 where that is already known to the after period where
12 you see the dramatic rise in negative sentiment and
13 in association such as tone deaf, bully, and so
14 forth.

15 Q. Well, wouldn't it be reasonable to assume
16 there would be a rise in negative sentiment if
17 someone had previously done some bad things or said
18 some bad things? Wouldn't people be predisposed to
19 say, "Huh, so now she is doing XYZ, but I remember a
20 few years ago she did ABC. Yeah, I'm not a fan
21 anymore"?

22 Wouldn't those things be completely
23 irrelevant to anything Bryan Freedman did or said?

24 MS. BENDER: Objection.
25

1 Are you aware that in August, from
2 August 6th to the 9th of 2024 the film's premiere
3 event, the theatrical release, triggered a surge in
4 public engagement, including fan commentary,
5 influencer reactions, red carpet coverage, and
6 opening weekend box office reporting?

7 Would you agree with that?

8 MS. BENDER: Objection.

9 BY THE WITNESS:

10 A. I would need to look at the underlying
11 sources, but I don't have a reason to disagree with
12 that.

13 BY MR. SCHUSTER:

14 Q. Would those type of events increase
15 attention to the film, the actors, and/or the drama
16 that had been going on?

17 A. So what I observed in Dr. Mayzlin's report
18 of this very issue -- analysis of this very issue was
19 that not only was there increased volume, but there
20 was also increased negative sentiment during the
21 August time period, and there was increased negative
22 associations congruent with the alleged retaliation
23 campaign.

24 Q. Is it possible that the negative sentiment
25 related to Blake Lively's threats in connection with

1 expert noted that her alcohol brand Betty Booze
2 ranked among the top five ready to drink products at
3 Total Wine?

4 Did you see that in Mr. Mayzlin's report?

5 A. I recall seeing something like that. Again,
6 I did not base my report on that portion of her
7 analysis.

8 Q. And, again, the success of her business
9 enterprise does not impact your analysis of the need
10 for costs associated with her personal reputational
11 repair; is that correct?

12 A. I'm sorry, would you mind reasking it?

13 Q. Okay. I don't mind at all.

14 Is it your opinion that despite the success
15 of her businesses, she still needs reputational
16 repair in the amount of 14- to \$26 million?

17 MS. BENDER: Objection.

18 BY THE WITNESS:

19 A. Yes.

20 BY MR. SCHUSTER:

21 Q. Does your analysis of the cost for
22 reputational repair change at all if Ms. Lively
23 prevails in her lawsuit?

24 A. No.

25 Q. So if she wins the case, and a jury finds

1 in her favor, it's your opinion that she will still
2 need this 14- to \$26 million reputational repair
3 despite a jury verdict in her favor?

4 A. That's correct.

5 Q. And why is that?

6 A. So the purpose of the campaign to correct
7 the reputational damage is targeted at those who
8 received the initial statements. Because of a number
9 of factors related to digital media and the way
10 communication functions in the media system, it's not
11 at all a foregone conclusion that the target audience
12 will receive that message of the verdict. It's not a
13 foregone conclusion that they will trust that
14 message. And it's not at all a foregone conclusion
15 that that verdict would repair the reputational harm.

16 Q. Is it your opinion that a jury verdict from
17 the Southern District of New York in the case of
18 Blake Lively versus Justin Baldoni is not going to
19 be circulated across this country?

20 A. So as I said, it will -- that news will be
21 circulated. It's not a foregone conclusion that that
22 will make it to the target audience in question, to
23 the people who were initially exposed to the at-issue
24 statements. It's also not a foregone conclusion that
25 they will trust the implications of a jury verdict.

1 Q. Were they asked whether they considered her
2 a liar?

3 A. It was not in the public discourse, meaning
4 it was not attached to her reputation.

5 Q. But it doesn't mean people were not aware
6 of it, doesn't mean people didn't have underlying
7 feelings, it doesn't mean that people didn't have
8 underlying experiences about viewing her, reading
9 about her, observing her.

10 So it could have been something dormant
11 that her initiation of this very public lawsuit
12 brought to the forefront of the conversation; isn't
13 that a possibility?

14 MS. BENDER: Objection.

15 BY THE WITNESS:

16 A. I have no evidence to support that.

17 BY MR. SCHUSTER:

18 Q. Do you have evidence to support that
19 Ms. Lively engaged in prior conduct that would
20 alienate members of the public?

21 MS. BENDER: Objection.

22 BY THE WITNESS:

23 A. Not exactly, no.

24 BY MR. SCHUSTER:

25 Q. Do you think getting married on a slave

1 BY MR. SCHUSTER:

2 Q. Well, but he doesn't make his statements
3 until she initiated a very public lawsuit. So there
4 would have been no reason for it to be in the public
5 discourse?

6 MS. BENDER: Objection.

7 BY THE WITNESS:

8 A. So reputation exists in the public
9 discourse. It's the associations that are connected
10 with one's name in the public sphere. As my analysis
11 shows on page 92 and 93, for example, the association
12 between Ms. Lively and being a liar was virtually
13 zero until after Mr. Freedman's statement.

14 BY MR. SCHUSTER:

15 Q. Did you ever research Blake Lively's
16 company that she started with her brother?

17 A. I did not.

18 Q. Where the lawsuits that were commenced
19 against Blake Lively and her brother for creating a
20 toxic work environment?

21 A. I did not.

22 MS. BENDER: Objection.

23 BY MR. SCHUSTER:

24 Q. Well, because that was not at the forefront
25 of a Google search, does that mean it's not true?

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REPORTER CERTIFICATE

I, ANDREW R. PITTS, C.S.R. within and for the County of Cook and State of Illinois, do hereby certify that heretofore, to wit, on Tuesday the 25th day of November, 2025, personally appeared before me via videoconference, ASHLEE HUMPHREYS, Ph.D., in a cause now pending and undetermined in the United States District Court of the Southern District of New York, wherein BLAKE LIVELY is the Plaintiff, and WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an Individual, et al., are the Defendants.

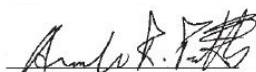
I further certify that the said witness was first duly sworn to testify to the truth, the whole truth and nothing but the truth in the cause aforesaid; that the sworn testimony then given by said witness was reported stenographically by me in the presence of the said witness remotely via videoconference, and afterwards reduced to typewriting by Computer-Aided Transcription, and the foregoing is a true and correct transcript of the videoconference testimony so given by said witness as aforesaid.

I further certify that the signature to

1 the foregoing videoconference deposition was
2 reserved by counsel for the Defendants. I further
3 certify that the taking of this deposition was
4 pursuant to Notice, and that there were present in
5 person and via videoconference at the deposition
6 the attorneys hereinbefore mentioned.

7 I further certify that I am not counsel
8 for nor in any way related to the parties to this
9 suit, nor am I in any way interested in the outcome
10 thereof.

11 IN TESTIMONY WHEREOF: I have hereunto
12 set my hand and affixed my seal this 26th day of
13 November, 2025.

14
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16

17 ANDREW R. PITTS, CSR, RPR
18 CSR, COOK COUNTY, ILLINOIS
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