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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,
Plaintiff,
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)
25-CV-449 (LJL) (MEMBER CASE)
WAYFARER STUDIOS LLC, ET AL.
Defendants.

JENNIFER ABEL,
Third-party Plaintiff,
vs.
JONESWORKS, LLC,
Third-party Defendant.

WAYFARER STUDIOS LLC, et al.
Consolidated Plaintiffs,
vs.
BLAKE LIVELY, et al.
Consolidated Defendants.

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VIDEO-RECORDED DEPOSITION OF DINA MAYZLIN
APPEARING REMOTELY FROM
Los Angeles, California
Tuesday, December 2, 2025

Stenographically Reported by:
Ashley Soevyn, CALIFORNIA CSR No. 12019
APPEARING REMOTELY FROM MARINA DEL REY, CALIFORNIA
JOB No. 7771655
Pages 1 - 204

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Video-recorded Deposition of
DINA MAYZLIN, taken on behalf of the Wayfarer
parties, with all parties appearing via video
conferencing beginning at 10:02 a.m. and ending at
3:27 p.m. on Tuesday, December 2, 2025, before me,
ASHLEY SOEVYN, California Certified Shorthand
Reporter No. 12019.

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1 discontinuity design. So I see a big change and I 11:18:11

2 --

3 Q I'm sorry, I didn't understand what you
4 just said. Could you repeat?

5 A Okay. Are you having trouble hearing me? 11:18:17

6 Q No, it was just a word. You use some
7 type of design.

8 A Oh, okay. I used what is called
9 discontinuity design, discontinuity. Okay?

10 Q Okay. 11:18:29

11 A It's this idea that something changes,
12 you know, something changes suddenly and that's one
13 type of causal inference technique. And so the
14 discontinuity here was the sudden change in August.
15 Change in conversations and ultimately change, you 11:18:48
16 know, a fall in sales.

17 So what I wanted to do was to reach out
18 to management and to make sure there were no other
19 exogenous factors that affected that. And by
20 exogenous factors, I mean other things that were 11:19:03

21 going on. For example, something in the competitive
22 space, something in the pricing, something as part
23 of, you know, just the kind of competitive marketing
24 landscape. For this reason, I wanted to have -- to
25 check in with the brands. You know, so the three 11:19:24

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1 brands that were involved. 11:19:27

2 And so I instructed the AG team to ask,
3 were there any other changes, you know, perhaps that
4 you saw? Something your competitors were doing, the
5 pricing, or anything like that. And Marimer said 11:19:40
6 no, there were no other changes. You know, the --
7 what was going on was what is discussed in the case
8 and my report, was the change in conversations,
9 the -- you know, the -- and then the controversy
10 and, you know, the tanking of the sales. 11:19:58

11 And for Betty B Holdings, the same thing.
12 I wanted to check, were there other exogenous
13 factors? Something to do with, you know, anything
14 else. Anything else that I'm missing, I want to
15 make sure, you know, I'm not misattributing what was 11:20:16
16 going on to some other factor that I don't know
17 about as a researcher. But the marketers that are
18 close to the problem, they might -- they know it.

19 And, again, so I was there for that Zoom
20 call. And I asked those executives, you know, 11:20:34
21 several times, were there changes? Were there
22 changes? And other changes in the marketing of the
23 product, in the marketing space or the pricing or
24 anything like that? And, again, the answer was the
25 same. What was going on was the controversy that 11:20:54

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1 impacted sales. 11:20:57

2 Q Did you ask for any documents from Blake
3 Brown Beauty or Betty B Holdings as part of those
4 discussions you had?

5 When I say "you," whether it's you or 11:21:17
6 someone from the Analysis Group, was there any
7 supporting documentation asked for as part of those
8 discussions?

9 A We already had a lot of -- a lot of data
10 from them. I had a lot of presentations, kind of 11:21:35
11 sales data. And all of that is -- you know, most of
12 it is -- it's documented in my report. So if you
13 look at my report, the data and sales, the -- some
14 of the -- if you look at my footnotes, it actually
15 came from those products, from the branding. From 11:21:52
16 the brands.

17 Did I ask them for new data or any
18 additional data? I don't really remember. But I
19 think at that point, we already had a lot of data.
20 I just wanted to make sure I wasn't missing 11:22:09
21 anything.

22 Q I know your discussions had to do with
23 what was going on in the competitive landscape, and
24 the answer was nothing. Everything was attributed
25 to the allegations in the complaint. 11:22:26

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1 What, if anything, did you do to verify 11:22:28
2 whether there were any other extrinsic factors going
3 on during the timeframe that you were researching?

4 A Okay. I'm actually going to break up
5 your question into two parts because it was a very 11:22:49
6 long question.

7 Q My apologies.

8 A So the first part was the way you
9 summarized my -- you know, what I told you was,
10 there was nothing going on. That's not quite true. 11:22:59
11 There were, you know, the regular seasonal trends.
12 So, for example, August, the drink, the beverage,
13 you know, executives told us that it's actually --
14 you know, it's a big -- it's a big -- there is a lot
15 of drinking that happens in barbecues. So it's 11:23:19
16 actually a very important, you know, time for the
17 beverage industry.

18 So there were sort of the regular things
19 going on. But what I was looking for was a
20 discontinuity. So what I was looking for was 11:23:35
21 something that was a change, right, like a big
22 change that was above and beyond the regular, you
23 know, workings of their landscape. And so was there
24 some, you know, some promotion that the other side
25 ran all of a sudden? Or was there something else? 11:23:53

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1 And so that was the nothing part, that there wasn't 11:23:56
2 a sudden discontinuity. So there was, of course,
3 always seasonality going on. But these things are
4 continuous, and I was looking for something more
5 discontinuous. 11:24:10

6 The other part was, did I verify on my
7 own? Can you just repeat the second part? Because
8 it was such a long question.

9 Q Yeah, I'm actually going to change the
10 question. Thank you for that clarification. But 11:24:22
11 you did say you were looking for what was a big
12 change and described things that happened seasonally
13 or just typical things that happen in a cycle of a
14 business.

15 Were you looking at potential big changes 11:24:37
16 outside of what was going on in the business that
17 might have resulted in negative online commentary?
18 Or was your focus on big changes as it related to
19 the businesses and the products?

20 MS. MOSES: Objection. 11:25:01

21 THE WITNESS: So I was meeting with the
22 businesses. So I wanted to know, from their
23 perspective. And, again, this is -- I wasn't -- you
24 know, I wasn't looking -- I wasn't really talking
25 about them about -- if you think about my analysis 11:25:12

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1 as two parts. One was the social media part, and 11:25:19
2 then there was kind of the sales part.

3 I was looking to find alternative
4 explanation for the fall in sales that we saw in
5 August. You know, was there something that I was 11:25:32
6 missing? And so that's the expertise of the
7 business. They know their business well. They have
8 the data. And so that's why I went to them to ask
9 them, did you see -- was there something else going
10 on that would result, you know, in kind of rapid 11:25:48
11 fall in sales in August?

12 BY MR. SCHUSTER:

13 Q Who is the face of the business?

14 MS. MOSES: Objection.

15 MR. SCHUSTER: Who is the face of Blake 11:26:01
16 Brown Beauty?

17 THE WITNESS: The face?

18 BY MR. SCHUSTER:

19 Q Yeah. Whose company is it?

20 MS. MOSES: Objection. 11:26:14

21 THE WITNESS: So there is a company and
22 it has management. But it's affiliated, obviously,
23 you know, in terms of -- if you're asking me in
24 terms of kind of advertising, social media
25 communications, Blake Brown was the face of the 11:26:24

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1 business, but it's also -- 11:26:29

2 BY MR. SCHUSTER:

3 Q Who is Blake Brown? You mean Blake
4 Lively?

5 A Blake Lively. But if you're asking me 11:26:34

6 were there -- was there like a corporate managerial
7 structure? Yes. These were businesses. She wasn't
8 the CEO. She was the, you know, the kind of -- this
9 was the celebrity -- you know, celebrity affiliated
10 brands. 11:26:58

11 Q Right. So people affiliated the brand
12 with Blake Lively, correct?

13 MS. MOSES: Objection.

14 THE WITNESS: Yes.

15 BY MR. SCHUSTER: 11:27:03

16 Q And that would be for Blake Brown Beauty
17 and Betty B Holdings and their products, correct?

18 A If you look at the marketing, if you look
19 at how the brands were positioned, yes. The brands
20 were definitely affiliated, associated with her. 11:27:19

21 And that's really part of my argument. Why the
22 defamation, why the damage to her reputation
23 affected the brands.

24 Q You just used the word "defamation." Is
25 it your opinion that there was defamation? 11:27:32

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1 MS. MOSES: Objection. 11:27:34

2 THE WITNESS: Not at all. So my opinion

3 was more narrow. So my opinion looked at, was there

4 a change in word of mouth? And was this manipulated

5 by the Wayfarer team? 11:27:45

6 BY MR. SCHUSTER:

7 Q Okay.

8 A Whether or not -- defamation seems more

9 like a legal term. I'm definitely not a legal

10 expert so I was looking at manipulation or word of 11:27:55

11 mouth.

12 Q Understood. I only asked about

13 defamation because you used the word "defamation."

14 A Okay. I should say negative -- negative

15 hit to her reputation. Harm to her reputation is 11:28:06

16 the word I should use.

17 Q And would negativity about Blake Lively

18 cause a change potentially in how her products do?

19 A If you read my report, there is a section

20 that argues that there is a connection for celebrity 11:28:35

21 brands. So yes, you're --

22 Q I did read your report.

23 A Good.

24 (Crosstalk.)

25 As a professor, it's always good to hear. 11:28:48

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1 Q I'm asking specific questions about your 11:28:57
2 report and about your testimony. One of the things
3 you said were -- was you talked to management and
4 were inquiring about changes in the marketplace and
5 competitive edge and reasons for the decline in 11:29:12
6 sales.

7 And my question to you is -- and I think
8 you've just answered it -- is if there is negativity
9 or negative comments about Blake Lively, that could
10 negatively impact sales of her products, correct? 11:29:25

11 A Correct.

12 Q And is it possible that negative comments
13 about Blake Lively have nothing to do with an
14 alleged online manipulation campaign, but negative
15 comments could be the people just don't like Blake 11:29:42
16 Lively? Is that possible?

17 MS. MOSES: Objection. Objection.

18 THE WITNESS: There are two parts of my
19 report. So did a lot of work, and did a lot of
20 analysis showing that there was manipulation -- 11:29:58

21 BY MR. SCHUSTER:

22 Q I understand. And I'm going to get --

23 A That's the first point.

24 Q And I'm going to get to your report, but
25 I would like you to answer my question. 11:30:06

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1 Is it possible that people just don't 11:30:07
2 like Blake Lively?

3 MS. MOSES: Objection.

4 THE WITNESS: My data -- so I'm a data
5 driven person, right? I'm a scientist. My data 11:30:16
6 tells me that the word of mouth about Blake Lively
7 was very positive before August. The topics that
8 were discussed were very positive. And then there
9 was a change, you know, very negative change. So as
10 a scientist, based on my data, I would have to tell 11:30:32
11 you that this -- you know, this change was due to
12 manipulation.

13 BY MR. SCHUSTER:

14 Q Were you aware of anything negative about
15 Blake Lively prior to August of 2024? Or are you 11:30:46
16 only aware of the very positive -- your words --
17 reaction to Blake Lively?

18 MS. MOSES: Objection.

19 THE WITNESS: I'm not sure what do you
20 mean? Are -- 11:30:59

21 BY MR. SCHUSTER:

22 Q Were you aware --

23 A Are you talking about my data or me as a
24 person?

25 Q You as a person, as the expert on whether 11:31:05

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1 that manipulation negatively impacted her brand, you 11:31:10
2 said the word of mouth about Blake Lively, it was
3 all very positive.

4 My question to you is: Was it all very
5 positive about Blake Lively prior to August of 2024? 11:31:21

6 A The data would reveal what I found is
7 that yes, it was largely -- it was very positive
8 before.

9 Q And was all of that positivity about
10 Blake Lively organic or was any of that positivity 11:31:39
11 the result of Blake Lively's public relations team?

12 MS. MOSES: Objection.

13 THE WITNESS: So, again, what I'm using
14 here is what is called discontinuity design. I'm
15 looking at the change. I'm not making -- there is 11:31:59
16 nothing in my report that talks about, you know,
17 what was -- how was word of mouth generated before.
18 All I know is that I can tell you what the word of
19 mouth was before, and I can tell you a very sharp
20 change in August. 11:32:18

21 BY MR. SCHUSTER:

22 Q Okay. So you have no idea how the word
23 of mouth resulted in a very positive reaction to
24 Blake Lively prior to August of 2024? You don't
25 know whether it was natural? You don't know if it 11:32:26

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1 was a result of her good work? You don't know if it 11:32:29

2 was a result of her good looks? You don't know if

3 it was a result of her public relations machine?

4 MS. MOSES: Objection. Just give me a

5 moment to object. 11:32:42

6 THE WITNESS: Sorry. So I have some

7 ideas. Let me actually go back. Do you want to

8 take a look at the exhibits in the case so we're a

9 little bit more --

10 BY MR. SCHUSTER: 11:32:49

11 Q Not yet.

12 A Not yet?

13 Q I would like an answer to my question.

14 How do you know that it was a very positive

15 environment about Blake Lively prior to August of 11:33:03

16 2024?

17 A Okay. So let me just correct myself a

18 little bit. Before August of 2024, there was a lot

19 of -- the word of mouth about her was actually

20 neutral. So it was neither positive nor negative. 11:33:16

21 It was just neutral. And then there was also

22 positivity as well. So it was a mix of basically

23 neutral and positive. There was just a lack of

24 negativity.

25 I know a little -- I mean, I know some 11:33:30

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1 things about the word of mouth. Because I did -- I 11:33:33
2 did what is something called LDA analysis so I will
3 look at the topics. I can tell you what people are
4 talking about. You know, there is a lot of talk
5 about outfits, you know, just sort of, you know, 11:33:47
6 other celebrities.

7 So based on that, I would say -- and,
8 again, based on the fact that there is also a lot of
9 neutral conversations, I don't -- I don't see any
10 negativity. And it seems very natural for people 11:34:03
11 to -- you know, it seems like the type of celebrity
12 discussions that, you know, celebrity -- that people
13 talk about celebrities. They talk about their
14 jewelry, their outfits. You know, the Met Gala
15 was -- I believe is like a gathering where people -- 11:34:16
16 you know, there is like a big party and celebrities
17 come and she wears -- I guess she's very
18 fashionable, I learned. And so, you know, they
19 talk -- there was a lot of talk about her outfits,
20 and people seem to enjoy talking about that. 11:34:32
21 So I would say that based on my data, it just seemed
22 like, you know, these were positive, neutral
23 conversations about celebrities. That's all I can
24 say.

25 Q When did you -- was there a start date to 11:34:47

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1 when you began looking at Blake Lively's reputation 11:34:51
2 online? Like was there a baseline, as of
3 August 2024, she was mostly positive, as of
4 April 2024, she was mostly positive? Do you have a
5 start date for me? 11:35:11

6 A Yeah, so I did a pull from Pulsar TRAC
7 Data, and we went back -- I went back to the
8 beginning of May 2024.

9 Q Is there a type of rating that a
10 celebrity has that, you know, she had a 50 percent 11:35:30
11 approval rating, a 90 percent approval rating, a
12 10 percent approval rating? Is there anything like
13 that that exists in your world?

14 A That, I don't know.

15 Q So other than as of May 2024, your 11:35:44
16 testimony is the online communications about
17 Blake Lively were very positive; is that correct?

18 A There was a mix of neutral and positive.
19 (Audio difficulties here.)

20 Q Do you know whether Blake Lively employed 11:36:14
21 public relations teams to assist in creating this
22 very positive or neutral reaction about her as of
23 May 2024?

24 MS. MOSES: Objection.

25 THE WITNESS: I'm sure she has public 11:36:42

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1 relations teams. I did know about her posts on 11:36:44
2 Instagram. So like every other celebrity, every
3 other person, every other celebrity, I'm sure she
4 wanted to convey a positive image. And she did her
5 best, you know, she posted, and she, you know, 11:37:00
6 looked her best. She posted and she dressed well
7 and she gave honest interviews. So that's all I
8 know.

9 BY MR. SCHUSTER:

10 Q Did you ever speak with any one person on 11:37:08
11 behalf of Blake Lively?

12 A I did not.

13 Q Do you know if she had a public relations
14 person or team employed by her in May of 2024?

15 A I don't know. But my inference is that 11:37:37
16 what seemed like celebrities do, especially high
17 profile ones, so she probably had one too.

18 Q Why do you believe that celebrities
19 employ public relations professionals?

20 A Public image is very important. And, you 11:37:55
21 know, her job -- her job is in the movie industry
22 so, you know, people go to see movies of people they
23 like. Also, she has these brands and so, you know,
24 there is kind of a commercial, you know, her
25 public -- her image is very important for her also, 11:38:17

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1 you know, for her brands as well. 11:38:22

2 And so my assumption would be that there
3 are professionals who are -- you know, there is a
4 big difference between, you know, doing PR to just
5 sort of maintain a positive image and doing PR to 11:38:36
6 try to manipulate word of mouth in a negative way
7 about someone you don't like.

8 Q Of course. Do you know if Blake Lively
9 ever engaged PR to manipulate social media sites?

10 MS. MOSES: Objection. 11:39:00

11 THE WITNESS: Everything I read connected
12 to this case made me think that she was, in fact,
13 very careful not to speak -- you know, she wasn't
14 speaking too much to the media. I remember there
15 was so much change, I think it was in the complaint, 11:39:11
16 that, you know, there was nothing in there that made
17 me think that she was engaging in that.

18 BY MR. SCHUSTER:

19 Q Do you think she ever spoke negatively
20 about Justin Baldoni? 11:39:22

21 MS. MOSES: Objection.

22 THE WITNESS: Spoke to her husband? To
23 her friends? Spoke to whom?

24 BY MR. SCHUSTER:

25 Q Any -- did she ever speak negatively 11:39:30

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1 about Justin Baldoni that made its way into the 11:39:35
2 public sphere?

3 MS. MOSES: Objection.

4 THE WITNESS: You're asking me questions
5 about personal conversations that I would have no 11:39:42
6 instance of knowing.

7 BY MR. SCHUSTER:

8 Q I'm not asking you about personal
9 conversations. You're talking about the importance
10 of PR as it relates to celebrities. You just said 11:39:51
11 there's a big difference between celebrities who
12 have PR. And there's a big difference between PR
13 and manipulation, which you have opined my clients
14 are responsible for. I asked a question whether
15 you're aware whether Blake Lively or any of her 11:40:08
16 representatives ever participated in online
17 manipulation? Do you know; yes or no?

18 MS. MOSES: Objection.

19 THE WITNESS: I did not -- you know, I
20 stick to things that I have data on and that I have 11:40:19
21 documents and I saw no documents that relate to
22 that.

23 BY MR. SCHUSTER:

24 Q Did you look? Did you research whether
25 Blake Lively and/or any of her representatives ever 11:40:30

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1 participated in online manipulation to improve her 11:40:34
2 reputation?

3 MS. MOSES: Objection.

4 THE WITNESS: I did not research that.

5 It was not part of my assignment. 11:40:44

6 BY MR. SCHUSTER:

7 Q Understood. Your only assignment was to
8 research whether the Defendants participated in
9 online manipulation, at least part one of your
10 assignment, correct? 11:41:00

11 A That is correct.

12 Q Have you ever asked Blake Lively and/or
13 any of her representatives whether they participated
14 in online manipulation?

15 MS. MOSES: Objection. 11:41:18

16 THE WITNESS: There was nothing in
17 anything that I saw that would suggest to me that
18 this was happening. And so the thought didn't occur
19 to me because it just was not something that there
20 was any evidence -- there was no evidence of that at 11:41:32
21 all. So no, I did not.

22 BY MR. SCHUSTER:

23 Q No evidence of what was provided to you
24 to review, correct?

25 MS. MOSES: Objection. 11:41:40

1 BY MR. SCHUSTER: 11:41:40

2 Q Is it your testimony that out of what you
3 reviewed, you did not see any evidence; is that
4 correct?

5 A I saw no evidence based on the research 11:41:49
6 that I had done. It did not occur to me. I did
7 not -- this was not something that was part of my
8 assignment so I did not go into it.

9 Q So the only research you did was to
10 review the materials that were provided to you, 11:42:02
11 correct?

12 MS. MOSES: Objection.

13 THE WITNESS: That's incorrect. So I
14 actually gathered a lot of data, so that Pulsar TRAC
15 data was over one million online posts, so I 11:42:13
16 collected a lot of data myself.

17 BY MR. SCHUSTER:

18 Q And what was the date of the Pulsar
19 collection?

20 A So when was it pulled? 11:42:21

21 Q No. Was there a range for Pulsar? Does
22 it go from the beginning of time or was there a
23 specific time period you utilize to pull
24 communications?

25 A So my report talks about that. So the 11:42:37

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1 data range was from May 2024 to February 2025. 11:42:42

2 Q So you did not pull or review any online
3 conversations about Blake Lively prior to May 2024;
4 is that correct?

5 A That's right. 11:43:04

6 Q Did you research, outside of Pulsar, did
7 you or Analysis Group research any online articles,
8 conversations, posts about Blake Lively that existed
9 prior to May 2024?

10 A Okay. So let me just address a little 11:43:25

11 bit what discontinuity design is in causal
12 inference. You usually look at sort of time
13 windows. So before and after the event. So I
14 looked at a three months' time window. It's a
15 fairly long time window before August. So I had 11:43:47
16 data from May, June, and July and then a longer time
17 window afterwards. Because when it -- you know,
18 there was also an event in November of 2024. That's
19 sort of the scientific reason why I looked at three
20 months. 11:44:10

21 There was also some technical reasons why
22 three months was appropriate. Because Pulsar
23 actually -- you go back in time -- or can't go back
24 all the way in time so there was some limitations.
25 So one year was, you know, we did a little bit more 11:44:23

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1 mean, I can write. You know, I can do some coding, 12:10:08
2 yeah, sure.

3 Q Okay. Was the code that was drafted to
4 do the analysis in this case, was that peer-reviewed
5 by anyone in the industry? 12:10:21

6 MS. MOSES: Objection.

7 THE WITNESS: No.

8 MR. SCHUSTER: Okay.

9 BY MR. SCHUSTER:

10 Q Was the code independently verified by 12:10:39
11 anyone other than the Analysis Group?

12 A So the code was included as part of the
13 production. So the code was shared with -- you
14 know, with the other side. And so they could, if
15 they wanted to, they could definitely rerun it. So 12:10:57
16 that's the idea, is that everything is documented.
17 Everything is there. You can -- you can recreate
18 all the graphs. You can recreate all the analysis.
19 So I handed in the raw data, the code, and then, you
20 know, so they could do it. I don't know. 12:11:14

21 Q Who is they?

22 A Anybody in your firm. Nicole Alexander.
23 Anybody else who wanted to rerun it, they could
24 rerun it.

25 Q Okay. Has the code been independently 12:11:29

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1 as you see fit. 12:44:52

2 THE WITNESS: Okay. So my -- so my
3 report, in my report I show that -- I show in all
4 these different ways, you know, in different -- you
5 know, I caught the data different ways, different 12:45:04
6 types of analyses. I think I do something like, you
7 know, five or six different types of analysis, that
8 there was a change.

9 There was a sudden change, a
10 discontinuous change in the online word of mouth, in 12:45:15
11 the online conversations about Blake Lively. And I
12 show that there was negativity but that there was
13 negativity that wasn't there before. So the
14 conversations, again, changed from positive and
15 neutral to, you know, there was a sizable amount of 12:45:34
16 negative conversations.

17 But I go beyond that. So I looked at the
18 topics and I looked at, you know, the themes of the
19 conversations. And the themes really reflected the
20 scenario planning document, you know, the articles 12:45:54
21 that we know were planted by the Baldoni team. And
22 based on that, I infer that yes, there was
23 manipulation of social media by the Wayfarer team.

24 BY MR. SCHUSTER:

25 Q You inferred that there was manipulation. 12:46:05

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1 why there was a change in opinion about Blake Lively 12:48:34
2 during the time period that you looked at?

3 And if I -- I know you talked to the
4 business people and you said to the business people,
5 anything in the marketplace that we should know 12:48:47
6 about? But did you consider any other reasons why
7 there was a change in the online commentary about
8 Blake Lively during the period of May 2024 to
9 February 2025?

10 A So I mean, in some sense, I did. Because 12:49:05
11 I didn't see any kind of discontinuity in what she
12 was doing. So she was doing -- you know, the little
13 bump video I think was around for a long time. That
14 was done a long time ago. So what Blake Lively was
15 doing, you know, was fairly stable. 12:49:23

16 And so -- and, again, one of the -- like
17 for example, one of the analysis I did was, I looked
18 at the themes in the -- like, for example, the
19 article, the articles planted by the Wayfarer teams.
20 And I looked at, you know, do you see that sort of 12:49:41
21 text appearing, you know, those four themes. Are
22 they appearing in conversations.

23 I saw them appearing in August and not
24 appearing before. So there was lots of indications
25 that, you know -- and same thing for scenario 12:50:00

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1 planning. Particular things -- you know, little 12:50:02
2 bump was just one of many things that was going on.
3 Production, she was a bully, she was a mean girl,
4 things were happening on the set, kind of
5 behind-the-scenes stuff. Which was exactly the 12:50:13
6 things that were said in the documents. And they
7 were appearing in these conversations in August.

8 Q Okay. What articles were -- I think you
9 used the word "planted" by the Wayfarer teams. The
10 Wayfarer team. 12:50:29

11 A Yeah. So there were two articles that I
12 used. One was a Variety article and then the other
13 one was, I think, The Daily Mail.

14 Q And what do you mean by "planted"?

15 A So they were -- there was a publicist who 12:50:41
16 fed certain talking points to the author.

17 Q What is wrong with that?

18 MS. MOSES: Objection.

19 THE WITNESS: What is wrong with that?

20 BY MR. SCHUSTER: 12:50:58

21 Q Yes.

22 A In theory, that's not wrong. But in this
23 case, it spread this kind of -- you know, these kind
24 of themes that amplified those themes and spread
25 them. It harmed Blake Lively's reputation. 12:51:08

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1 the question. 12:59:35

2 BY MR. SCHUSTER:

3 Q Were any of her actions -- could any of
4 her actions as they relate to Justin Baldoni be
5 viewed as negative? 12:59:43

6 MS. MOSES: Objection.

7 THE WITNESS: This really seems beyond.
8 You know, you're asking me to make a value judgment.
9 Which I am not comfortable.

10 BY MR. SCHUSTER: 12:59:50

11 Q No, I'm asking you to tell me whether
12 there are other factors that could have or should
13 have been considered in your opinion.

14 Your opinion is, based upon a spike, it
15 had to be the Defendants, or because I saw this 01:00:01
16 planning scenario, it had to be the Defendants.

17 I'm suggesting that there are other
18 things that could have or should have been
19 considered by you when trying to determine why there
20 was a spike in online activity. 01:00:12

21 MS. MOSES: Objection. Wait for a
22 question.

23 BY MR. SCHUSTER:

24 Q So if Blake Lively told costars to
25 unfollow Justin Baldoni, that could be viewed as 01:00:24

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1 being a bully or mean. That could prompt online 01:00:28
2 commentators to opine that she's not a very nice
3 person. Would you agree with that?

4 MS. MOSES: Objection.

5 THE WITNESS: So what you're telling me 01:00:44
6 just still doesn't explain all the data. Right?
7 So, you know, even if she -- okay, so she says to
8 unfollow him. Then why all this information about
9 what happened on the set? And also, why would it be
10 -- you know, if there is one or two people, you 01:01:02
11 know, putting on something on social media, which
12 seems odd that they would do that, why would it take
13 off with such a force? No, I don't think that's
14 plausible either.

15 BY MR. SCHUSTER: 01:01:16

16 Q Have you ever worked on a movie set?

17 MS. MOSES: Objection.

18 THE WITNESS: I have not.

19 BY MR. SCHUSTER:

20 Q Have you ever worked on a case involving 01:01:20
21 a movie?

22 MS. MOSES: Objection.

23 THE WITNESS: Yes.

24 BY MR. SCHUSTER:

25 Q Okay. Are you familiar with the 01:01:27

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1 MS. MOSES: Objection. 01:06:49

2 THE WITNESS: So I think that -- what I
3 think about it is the following: You know, how does
4 a manipulation campaign work? You know, you kind of
5 have to get the ball rolling. You get -- you know, 01:06:59
6 you put these tidbits, you know, and negativity is
7 much more sticky than -- you know, and you put these
8 kind of negative things about the person or the
9 brand. And then you're hoping that it will get
10 amplified by others. 01:07:16

11 I think what happened in this case was
12 the Wayfarer team got the ball rolling, played some
13 stories, worked with Street Relations to amplify, to
14 take down accounts, you know, and then, yeah, people
15 reacted, people were interested, people passed the 01:07:34
16 information on and so forth.

17 So there is still -- the Wayfarer -- my
18 sort of -- you know, my point is that my data tells
19 me that this wouldn't have happened on its own.
20 That the Wayfarer -- you know, there was a presence 01:07:54
21 of a manipulation. You know, I can't tell exactly
22 how much of it was it -- was every comment posted?
23 Was it 10 percent of the comments? Was it 5 percent
24 of the comments? But they lit the match that then
25 burned the forest. 01:08:09

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1 She's apologized for it. So it's factual. It 01:15:35
2 happened.

3 My point being, there are things that
4 happened in Blake Lively's past. That's my analogy
5 to something being dormant. Did you consider that 01:15:44
6 any of these underlying past acts by Blake Lively,
7 these dormant acts, could have organically begun to
8 be talked about in the August time period because of
9 other acts that Blake Lively did, things she said,
10 or acts that she took that resurrected people 01:16:04
11 talking about her past? Did you consider that?

12 A Again, going back to my data, which is
13 really the thing that I have. You know, that's my
14 expertise. What I see is this kind of a change.
15 Also, I see that the themes that are talked about 01:16:23
16 very, very closely mirror the themes that the
17 publicity team for Baldoni placed into the articles
18 and also that had in the scenario planning.

19 So no, I don't think it's plausible that
20 this stuff kind of appeared on its own. I think, 01:16:42
21 you know, people worked to make it appear.

22 Q Were there things talked about that were
23 not a part of the themes that you saw in the
24 scenario planning?

25 Were there conversations, negative 01:16:59

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1 BY MR. SCHUSTER: 01:22:52

2 Q Okay. But your report talks about a
3 causal relation between planting a seed and your
4 allegation that the Wayfarer parties are responsible
5 for initiating a retaliation campaign and the result 01:23:00
6 of that.

7 My question is: Isn't it possible that
8 there are other alternatives to the Wayfarer parties
9 putting stories out there about Blake Lively?

10 MS. MOSES: Objection. 01:23:19

11 THE WITNESS: You know, I can't rule out
12 every single alternative hypothesis, you know, that
13 maybe the aliens landed, maybe something crazy
14 happened. But what I can tell you is, based on my
15 data, I see this discontinuous change in the tone of 01:23:37
16 the conversations, in the volume of the
17 conversations, and the themes of the conversations
18 in a way that reflects directly the documented
19 evidence in how the Wayfarer team was thinking
20 about, you know, which points would stick. And 01:23:52
21 that's what I see in my -- and that's what I'm happy
22 to talk about.

23 BY MR. SCHUSTER:

24 Q Okay. I'm not talking about aliens. I'm
25 talking about real people like the bullied female AD 01:24:01

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1 like to show you an exhibit. I'm just going to talk 02:29:49
2 to my associate Jordan about how to get this to you.
3 Has that been loaded?

4 MS. BIENER: I just introduced it. So if
5 she refreshes it, it should be there. 02:29:56

6 (Exhibit 2 marked for identification.)

7 MR. SCHUSTER: Okay. So Professor, I
8 think you have to hit refresh and then --

9 THE WITNESS: I just see my report, but
10 maybe I'm -- hold on. I see it. It's loading. 02:30:17
11 Okay.

12 BY MR. SCHUSTER:

13 Q So I'm going to show you -- do you have
14 it, Professor?

15 A I have it, yup. 02:30:25

16 Q Okay. I'm going to show you a two-page
17 document that is Bates-stamped SPE_WF0000793 and
18 794. And I would like to direct your attention to
19 the second page of the document which has the text
20 on it. Let me know if you have that. 02:30:46

21 A Okay.

22 Q Now, you've stated there is no plausible
23 explanation for the spike of online activity in
24 August of 2024. And what I'm showing you is a text
25 exchange between two executives at Sony. 02:31:02

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1 And as we talked about earlier, Sony was 02:31:05
2 involved in the production and financing of the
3 movie It Ends with Us. Okay?

4 And I'm going to read from you -- read
5 for you the exchange. Starts with Sanford Panitch. 02:31:18

6 (As read):

7 "It's quite ironic because she has a
8 huge hit movie 2- 300 million plus.
9 And probably will never work again or
10 not for a while, although even Hathaway02:31:31
11 recovered. Tom thinks she's probably
12 and bizarrely unhirable right now."

13 The response from the person identified
14 as "Home" is:

15 "This will pass. She is going to be 02:31:43
16 fine."

17 That individual then responds:

18 "An apology to that reporter would
19 help. Something to survivors too other
20 than a 24-hour thing or her Insta 02:31:56
21 stories too."

22 Mr. Panitch then responds:

23 "No. Disagree. She is done for. At
24 least for a while. It's cooked. She
25 said she is retiring to Josh or 02:32:06

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1 something. It will take a few years. 02:32:08
2 Eva Mendez time. She did it to
3 herself. If she just let him come to
4 the premiere or didn't make all the
5 cast unfollow him or kick him off the 02:32:19
6 movie and did what everyone else has
7 done in show business for time and
8 memorial which is protect 'the show'
9 then none of the sleuthing would have
10 happened. The hair sell at the same 02:32:32
11 time was epic level stupid. She
12 wouldn't listen. She knows better."
13 I don't know what the next word is --
14 "Intl is astounding 150 and 150 and
15 could be more." 02:32:49
16 Did I read that correctly?
17 Professor, did I read that email exchange
18 correctly?
19 A Oh, did you read it like outloud, yeah,
20 you did. 02:33:01
21 Q Okay. Would you agree that these Sony
22 executives have a different opinion than yours as to
23 what could have caused the Blake Lively backlash?
24 MS. MOSES: Objection.
25 THE WITNESS: I mean, you're showing me 02:33:19

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1 an exchange between two executives just kind of 02:33:20
2 gossiping about Blake Lively. Sure. I mean, I have
3 a million records, more than a million records.
4 Would love to talk about that.

5 BY MR. SCHUSTER: 02:33:33

6 Q I know. But my question is: Would you
7 agree that these two Sony executives agree that
8 Blake Lively bears responsibility for her actions?

9 MS. MOSES: Objection.

10 THE WITNESS: They are just the -- sure. 02:33:46
11 They are saying stuff about her. They are blaming
12 her for everything.

13 BY MR. SCHUSTER:

14 Q That doesn't sit well with you?

15 MS. MOSES: Objection. 02:33:56

16 THE WITNESS: It just has nothing to do
17 with my data or my analysis or what I was hired to
18 do. Why I'm here but...

19 BY MR. SCHUSTER:

20 Q Does your data or analysis support the 02:34:04
21 claim that the Defendants manipulated any algorithms
22 on social media sites?

23 A Algorithmic manipulation, my report
24 doesn't talk about that. Mentions it but doesn't --
25 I don't look for that. 02:34:23

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1 was kind of that tension, was because of the 02:44:36
2 article, was because of the lawsuits being filed
3 and, you know, the speculation around the lawsuits
4 but the type of conversations that people were
5 having were still -- you know, those themes that 02:44:53
6 were planted back in August, we see them again
7 spiking in December. And it really follows the same
8 kind of pattern.

9 So I would say yes, the fact that the
10 lawsuit was filed, the complaint was filed, and the 02:45:11
11 lawsuit was filed renewed attention to the topic.
12 But also, again, the seeds that were planted in
13 August, you know, again, were in that -- you know,
14 the same kind of topics, you know, oh, the set, the
15 production, whatever, the bullying, all these things 02:45:29
16 that were planted came up again. So that's why I
17 wanted to show both graphs.

18 Q Thank you. And, again, just to confirm,
19 neither you or anyone from the Analysis Group have
20 ever spoken with, met with, or communicated with any 02:45:42
21 poster, any person that has posted on social media;
22 is that correct?

23 A That's correct. And I really wasn't --
24 you know, I wasn't a part of the analysis.

25 Q Okay. Now, you constructed a set of 02:45:58

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1 A Yeah, I think so. 02:53:26

2

3 Q And what training did those analysts have
4 to work with you on this?

5 A So by design, I would want human raters 02:53:40
6 not to be super trained. Like not to have too much
7 information about Blake Lively or anything like
8 that. So they were blind to the case. They were
9 not working on the case, they were working on some
10 other cases, and they were given very detailed 02:53:54
11 instructions. And that's listed in Appendix C of my
12 report.

13 Q Did they know that this case involved
14 Blake Lively or, as you said, did you say blind so
15 they have no idea -- 02:54:07

16 A Blind, yeah. They just -- I mean, they
17 knew that -- the only thing they knew is that the
18 posts were about, you know, Blake Lively or
19 Ryan Reynolds. But they didn't know the nature of
20 the case, they weren't working on the case. They 02:54:21
21 were not involved in the case in any way.

22 Q Okay. Large language model, has that
23 achieved acceptance in the scientific community as a
24 reliable substitute for traditional sentiment
25 analysis methods? 02:54:45

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1 A So my answer will be yes. So I use a 02:54:49
2 model called GPT-4o, and it's a transformer model.
3 Prior to GPT-4o, you know, sort of the prior version
4 of this type of model, which wasn't large language
5 model but was what is called a transformer model 02:55:05
6 just like, you know, the GPT, the T -- you might be
7 familiar with ChatGPT, but this is the engine behind
8 ChatGPT.

9 So the T actually stands for transformer.
10 And so prior to that, there were something called 02:55:18
11 transformer BERT was the Google transformer model.

12 But yeah, absolutely. So the state of
13 the art now in the industry and also in academia are
14 to do sentiment analysis, is to use these kind of --
15 to use a large language model. And GPT-4o is 02:55:34
16 probably the most popular model for that.

17 Q Okay. And is it your opinion that the
18 marketing science community has reached a consensus
19 on the reliability of large language model?

20 A I think so. You know, and I say this as 02:56:01
21 a -- I was just an associate editor of a journal
22 called Marketing Science, which is our top journal.
23 And I will give you an example. If an author had a
24 paper that used BERT for example, which is kind of
25 the old version, people would just say why don't you 02:56:13

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1 just use GPT-4o. 02:56:16

2 So I think it is pretty much the standard
3 thing now. It's really effective which is why it's
4 taken over in a short amount of time. The other
5 thing -- maybe I'm over-sharing a little bit -- the 02:56:35
6 other thing that it's really -- these LAR models are
7 really good at is that they -- their inputs are
8 sensitive to the context.

9 So Appendix C describes the prompt they
10 give. And it basically allows you to ask questions 02:56:51
11 about, you know, what is your attitude about
12 Blake Lively. Versus something like BERT, it just
13 kind of pretrained on -- you know, it doesn't really
14 allow you to take that as input. So it's just like
15 is this positive or is this negative? And here, you 02:57:05
16 can ask a more specific prompt.

17 Q The spike that occurred in August of
18 2024, did that occur across multiple social media
19 platforms? Or I think you looked at three?

20 A Yeah, absolutely. So I don't actually 02:57:31
21 differentiate between like -- you know, I think we
22 did do some robustness where we looked at the
23 patterns were similar across the platforms. The
24 figures I give are actually aggregated across all
25 platforms. But the patterns are similar. Yeah, you 02:57:46

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1 prove manipulation? Or is it your opinion that that 02:59:58
2 is the only thing you need to do to prove
3 manipulation?

4 A I would never assume that. That's why --
5 this is just one out of many figures. Right? I 03:00:09
6 think the volume analysis is kind of the first thing
7 I do. I think I do six or seven different analysis.
8 This is just the beginning. By itself, absolutely
9 not. It would not prove anything. But taken
10 together as a portfolio of all of these different 03:00:26
11 analysis, look at the themes, the sentiment, and so
12 forth, yes, then it works together. My report works
13 as a portfolio of analysis.

14 Q Are you familiar that the entertainment
15 industry -- withdrawn. 03:00:44

16 Would you agree that social media
17 surrounding the entertainment industry is inherently
18 volatile and prone to spikes?

19 MS. MOSES: Objection.

20 BY MR. SCHUSTER: 03:01:00

21 Q Or you don't know?

22 A I don't know.

23 Q Okay. You had made reference to findings
24 from Nicole Alexander in her report that you found,
25 and I forgot the word that you used. Curious or 03:01:42

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1 even the topic of the paper is not what she says it 03:03:12
2 is. It just makes no sense to me. I couldn't even
3 figure out what was going on with that.

4 And there are a couple of citations that
5 look hallucinated. They have -- they don't exist 03:03:27
6 basically, so there's -- or the name or titles are
7 off. So, again, that usually happens when -- I
8 mean, I don't want to say that's what she did at all
9 because that's not my place.

10 But if this happened to one of my 03:03:45
11 students, I would say they were maybe using AI to
12 generate citations.

13 And then there are lots of statements
14 that are made that are just not true and not based
15 on anything that I just don't agree with. How 03:03:57
16 things are manipulated, that's just not what the
17 literature says. And some statistical -- I feel
18 like -- there was a statistical significance that
19 was made on just very few data points. That's not
20 really -- that's not really allowed. 03:04:14

21 I would say just a bunch of different
22 issues from the beginning to the end, you know,
23 logic, data, citations, so I -- you know, I was
24 surprised.

25 Q Now, in addition to opining upon the 03:04:35

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REPORTER'S CERTIFICATE

I, ASHLEY SOEVYN, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was put under oath by me;

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

That a review of the transcript by the deponent was/ was not requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 3rd day of December, 2025.



ASHLEY SOEVYN, CSR No. 12019