

SEPTEMBER 23, 2025

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

3 ---000---

4
5 BLAKE LIVELY,

6 Plaintiff,

7 vs.

CASE NO. 24-CV-10049-LJL (LEAD CASE)

25-CV-449 (LJL) (MEMBER CASE)

8
9 WAYFARER STUDIOS LLC, ET AL.

10 Defendants.

11 JENNIFER ABEL,

Third-party Plaintiff,

12 vs.

JONESWORKS, LLC,

Third-party Defendant.

13 WAYFARER STUDIOS LLC, et al.

14 Consolidated Plaintiffs,

15 vs.

BLAKE LIVELY, et al.

Consolidated Defendants.

16
17 **CONFIDENTIAL**

18
19 VIDEO-RECORDED DEPOSITION OF ANDREA GIANNETTI

20 Culver City, California

21 Tuesday, September 23, 2025

22
23 Stenographically Reported by: Ashley Soevyn,
CALIFORNIA CSR No. 12019

24
25

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1 or "It Ends with Us," and those both refer to the
2 film It Ends with Us. Okay?

3 A Understood.

4 Q Where are you currently employed?

5 A Sony Pictures.

6 Q And what is your position?

7 A Executive Vice President Production and
8 Senior Creative of Columbia Pictures.

9 Q Are Sony Pictures and Columbia Pictures
10 one and the same?

11 A Columbia is a label owned by Sony
12 Pictures.

13 Q And how long have you worked for Sony
14 Pictures?

15 A Over 35 years.

16 Q What positions have you held during that
17 time period?

18 A I started as a switchboard operator, then
19 became an assistant, then became a reader, then
20 became a creative executive, then became a director
21 of development, then became a vice president, then
22 became a senior vice president, then became an
23 executive vice president, then became an executive
24 vice president and senior creative.

25 Q Okay. That is quite a journey from

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1 switchboard operator to executive vice president and
2 senior creative.

3 What are your duties as executive vice
4 president and senior creative?

5 A I find ideas for movies. I develop the
6 screenplay with the producer and the writer, find a
7 director, work with many different departments in
8 terms of budgeting and packaging the film, oversee
9 the prep of the film, the production of the film,
10 and the post of the film until the film is locked.

11 Q Anything else?

12 A No.

13 Q And the films that you oversee in this
14 regard, are these films that are produced by Sony
15 Pictures or by other production companies?

16 A The majority of them are produced by
17 Columbia Pictures.

18 Q And how often do you work with outside
19 production companies?

20 A I work with outside production companies
21 all the time in terms of producers -- in terms of
22 producers.

23 Q How often have you worked with another
24 production company who is producing the entire film?

25 A Overseeing the production of the film?

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1 Q Yes.

2 A I've supervised over 70 films, so a
3 handful, not very many.

4 Q And how long have you held the position
5 of EVP and senior creative?

6 A About a month. The senior creative is a
7 new add.

8 Q And what is the -- what are the
9 additional duties as the senior creative?

10 A I'm still figuring that out.

11 Q How long did you hold the position of
12 EVP?

13 A I don't know exactly, but I -- 20 years?
14 I don't even remember, it's been that long. It
15 could be 15 years. I don't know.

16 Q Does 2003 sound right?

17 A Sure. So it is over 20.

18 Q That would be about 22 years. Does that
19 sound right to you?

20 A Yes.

21 Q Who do you report to in your position?

22 A Sanford Panitch.

23 Q And what is his title?

24 A I'm not even sure. I think he is
25 president of Columbia Pictures or maybe co-chairman.

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1 your mind, would trigger your desire to get somebody
2 neutral involved?

3 MR. FLOYD: Objection to form.

4 THE WITNESS: Something that was illegal.
5 Something that was unethical.

6 BY MS. HUDSON:

7 Q And would that include sexual harassment
8 or retaliation?

9 A Yes.

10 Q Were you part of the process by which
11 Sony became involved with the film It Ends with Us?

12 MR. FLOYD: Objection.

13 THE WITNESS: Can you say the question
14 again?

15 BY MS. HUDSON:

16 Q Sure. Were you part of the process by
17 which Sony became involved in the film
18 It Ends with Us.

19 A Yes.

20 Q What was your role?

21 A I was the creative executive.

22 Q Do you know how the film first came to
23 Sony?

24 A Yes.

25 Q How did it?

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1 what the -- that was the beginning of -- of a longer
2 process.

3 Q And how would you describe the synopsis
4 of It Ends with Us?

5 MR. FLOYD: Objection.

6 THE WITNESS: Seriously?

7 BY MS. HUDSON:

8 Q I just would like to hear your view on --
9 if you had to give an elevator pitch on what the
10 book was about, what would it be?

11 MR. FLOYD: Objection.

12 MR. FREEDMAN: Objection.

13 THE WITNESS: I really don't want to do
14 that.

15 BY MS. HUDSON:

16 Q Would it be fair to say that it has
17 themes of romance and female empowerment centered on
18 the lead character, Lily Bloom, on a journey to end
19 the cycle of document violence?

20 MR. FLOYD: Objection.

21 THE WITNESS: Yes.

22 BY MS. HUDSON:

23 Q Were you familiar with Wayfarer Studios
24 before Sony became involved?

25 A No.

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1 Q And that would be something that Sony
2 would typically retain the right to do as the
3 distributor?

4 A You're asking a lot of legal questions
5 that I -- I -- I have to be honest, I don't know the
6 legal answer to this. I know the process that I'm
7 familiar with. But typically, when you make
8 trailers and posters and spots, there are other
9 people who have to approve it before it's put out.

10 Q So just to be clear, I'm -- I'm only
11 asking you about your understanding. I understand
12 that you're not a lawyer. So...

13 A Right.

14 Q With respect to this film, was it your
15 understanding that Sony had the right to create and
16 release trailers?

17 MR. FREEDMAN: Objection.

18 THE WITNESS: It's my understanding that
19 Sony did create posters and trailers that they
20 shared with other people involved in the movie for
21 approval.

22 BY MS. HUDSON:

23 Q And so you don't know, sitting here
24 today, who had approval rights?

25 A I have an idea, but no, I don't know.

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1 Q What is your idea?

2 A I'm sure Ms. Lively had approval over
3 certain things. And I'm sure Wayfarer had approval
4 over certain things.

5 Q Have you ever seen any contract of
6 Ms. Lively's with respect to the film?

7 A No.

8 Q Did you understand that Wayfarer
9 initially requested that Mr. Baldoni have final cut
10 rights over the film?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: I think I did know that,
13 yeah.

14 BY MS. HUDSON:

15 Q And how did you know that?

16 A Because we had to -- because we said no,
17 and we had to come up with a mechanism in post for
18 what the final cut would be, which is common.

19 Q And when you say a mechanism for what the
20 final cut would be is common, what do you mean by
21 that?

22 A Since they were the rights holders and we
23 wanted to close a deal, there was a compromise that
24 if the movie tested a certain level at a preview and
25 Justin's cut hit those markers, he would have final

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1 cut.

2 Q And is that referred to as a bake-off?

3 A No, that is not -- yeah, I guess that's a
4 "bake-off."

5 MS. HUDSON: I'll hand the reporter a
6 document that we are marking as Exhibit 2. I'm
7 sorry. Exhibit 1. Is that premarked? Okay.
8 Sorry, I am not handing it to the reporter. I'm
9 handing it directly to you.

10 That is Exhibit 1, Giannetti 1. This
11 document is an email from Schuyler Moore to Michael
12 Marshall, dated September 27, 2022 to a variety of
13 people, including Ms. Giannetti. The subject is
14 "IT ENDS WITH US/Proposed Sony Co-Production Term
15 Sheet," Bates stamp beginning SPE_BL343.

16 (Exhibit 1 marked for identification.)

17 BY MS. HUDSON:

18 Q Ms. Giannetti, have you seen this
19 document before?

20 A I don't remember, but it's in front of
21 me, so it's possible.

22 Q And do you recognize this is an email
23 that you received, given your email address is on
24 here?

25 A It's the correct email address. I don't

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1 remember getting it or reading it, but I'm not
2 saying I didn't.

3 Q You have no reason to dispute that if
4 your email --

5 A I have no reason to dispute.

6 Q I'm sorry. I'm just going to finish my
7 whole question so we have it clear on the record.

8 You have no reason to dispute that if
9 your email address is on here, that you received
10 this email?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: Correct.

13 BY MS. HUDSON:

14 Q And at the beginning of the email, it
15 says:

16 (As read) :

17 "Michael, On behalf of Wayfarer
18 Studios, attached please find a
19 proposed term sheet for a co-production
20 for It Ends with Us, which has been
21 discussed with Sony."

22 Do you understand this as the proposal
23 that Wayfarer Studios gave for the co-production
24 agreement?

25 A That's what it says, yes.

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1 Q And you mentioned earlier that Wayfarer
2 initially requested that Mr. Baldoni have final cut.
3 Can you turn to the next page? This appears to be
4 the basic terms of the proposal from Wayfarer to
5 Sony.

6 Do you see that?

7 A Uh-huh.

8 Q Is that a yes?

9 A Yes.

10 Q Okay. And --

11 A The approval section, is that what you're
12 asking me?

13 Q Can you go to section 6.

14 A I'm at section 6.

15 Q It says:

16 (As read):

17 "Director. Justin Baldoni to direct
18 and to have final cut rights. Picture
19 to be edited of location of his
20 choosing."

21 A That's what it says.

22 Q And that's what you understand to have
23 been the original proposal from Wayfarer, correct?

24 A Correct.

25 MS. HUDSON: I'm going to hand you -- you

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1 can put that one aside. We're going to hand you
2 another document to be marked as Exhibit 2,
3 Giannetti 2.

4 BY MS. HUDSON:

5 Q Before we get into that, Ms. Giannetti,
6 what does final cut mean?

7 A It means the -- the finished film of the
8 picture, of the -- of the images.

9 Q So what is a final cut right, that you --
10 to your understanding?

11 A They are going to decide what is on
12 screen. It's their decision.

13 Q So if a director has final cut rights,
14 then it is up to the director's discretion what film
15 goes to the screen?

16 MR. FREEDMAN: Objection.

17 THE WITNESS: Correct.

18 (Exhibit 2 marked for identification.)

19 BY MS. HUDSON:

20 Q Let's turn to Exhibit 2. This is an
21 email from Michael Marshall to Schuyler Moore, dated
22 October 14th, 2022, to -- cc'ing a variety of
23 people, including Ms. Giannetti. The subject is
24 "IT ENDS WITH US/Proposed Sony Co-Production Term
25 Sheet," beginning with Bates stamp SPE_BL1995.

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1 Who is Michael Marshall?

2 A The head of business affairs.

3 Q And when you mentioned business affairs
4 before and they are the people that would negotiate
5 the contracts, is that who you were talking about?

6 A Correct.

7 Q And in Mr. Marshall's email, he says:

8 (As read):

9 "Sky - thanks again for forwarding the
10 proposal and jumping on the phone
11 earlier in the week. And thanks for
12 your patience as we've discussed
13 internally. Attached are Columbia
14 responses."

15 And Columbia, this is Columbia Pictures?

16 A Correct.

17 Q If you turn to the second page, it says
18 at the top:

19 (As read):

20 "Proposal to Columbia Pictures for
21 'It Ends with Us.'"

22 And if you go to that same paragraph 6,
23 do you see where I'm pointing?

24 A I do.

25 Q It says:

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1 (As read) :

2 "Director. Justin Baldoni to direct
3 and [to have final cut rights].

4 Picture to be edited at location of his
5 choosing. Columbia customarily doesn't
6 give director's final cut."

7 Is that your understanding that Columbia
8 didn't typically give director's final cut?

9 A Correct.

10 Q And why not?

11 A It's a very expensive proposition
12 releasing a film. And so that's a big leap of faith
13 with a big financial investment, so we do not
14 give -- it's very hard to get final cut.

15 Q Are there certain directors to whom you
16 would give final cut?

17 A Yes.

18 Q Like whom?

19 A Quentin Tarantino has final cut.

20 Q And why would a director like Quentin
21 Tarantino get final cut?

22 MR. FREEDMAN: Objection.

23 THE WITNESS: He's made a lot of
24 successful, highly acclaimed films. And also, he
25 controls them.

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1 BY MS. HUDSON:

2 Q What do you mean by that?

3 A It means he writes and he owns them, so
4 if you want to distribute them, he has all the
5 leverage in the deal.

6 Q Got it.

7 So Mr. Baldoni also owned the script and
8 could make the film. Are you saying that he did not
9 have the same track record of filmmaking as someone
10 like Quentin Tarantino had?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: No, he did not have the
13 same track record.

14 MS. HUDSON: We are going to next mark
15 Exhibit 3.

16 (Exhibit 3 marked for identification.)

17 BY MS. HUDSON:

18 Q Exhibit 3 is an email from Schuyler Moore
19 to Michael Marshall, dated October 27, 2022,
20 to -- cc'ing a variety of people, including
21 Ms. Giannetti. The -- starting with Bates stamp
22 SPE-BL367.

23 This email from Mr. Moore, says:

24 (As read):

25 "Attached please find a clean and

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1 redlined proposal with our remaining
2 minor requested changes."

3 Do you see that?

4 A I do.

5 Q And then if you turn to the next page,
6 we're going to look again at that paragraph 6,
7 regarding the director?

8 A Uh-huh.

9 Q Do you see that?

10 A I do.

11 Q And in this one, it says:

12 (As read):

13 "Final cut to be determined by
14 bake-off."

15 Do you see that?

16 A I do.

17 Q And then it says:

18 (As read):

19 "Bake-off ok provided that (a) it's a
20 blind recruit test screening and (b)
21 Justin's cut scores above 90-85 in the
22 top two boxes and above 70 in definite
23 recommends. Alternatively, if Justin's
24 cut scores at least 7 points higher in
25 definite recommends than a cut

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1 incorporating Columbia's changes, then
2 Justin's cut will also prevail."

3 MR. FREEDMAN: Objection.

4 BY MS. HUDSON:

5 Q Did I read that accurately?

6 A You did.

7 Q What did you understand this to mean?

8 A That if Justin and Sony had a
9 disagreement over the cut -- if -- there would be a
10 mechanism to determine what would be released.
11 If -- if he met these metrics.

12 Q And if he didn't meet these -- these
13 metrics, what is your understanding of what would
14 happen?

15 A Sony would be able to release the cut.
16 Our cut.

17 Q And the testing and the metrics, is that
18 what a bake-off is?

19 A Yeah. Yes.

20 Q And is it your understanding that if Sony
21 had a cut, there would be testing for Sony's cut as
22 well?

23 A Yes.

24 Q Earlier we discussed the fact that there
25 was a theme of female empowerment in the film, do

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1 A Previous success.

2 Q Once it became clear that Sony and
3 Wayfarer were going to get a deal done, did you
4 begin reaching out to talent agents regarding
5 casting Lily Bloom?

6 A Yes.

7 Q Did one of those talent agents include
8 Warren Zavala?

9 A Yes.

10 Q Who is Warren Zavala?

11 A He's a talent agent at WME.

12 Q And how long have you known Mr. Zavala?

13 A A long time. Many years.

14 Q Did you know who Mr. Zavala represented?

15 A Some of them.

16 Q Did you know that he represented
17 Blake Lively?

18 A I did.

19 Q Were you thinking about Blake Lively when
20 you reached out to Mr. Zavala?

21 A Not the first time.

22 Q Who -- is there someone else you were
23 thinking of?

24 A Yes.

25 Q Who were you thinking of?

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1 Q Did you feel that she overall had a
2 positive reputation?

3 A I thought so, yeah.

4 Q And after Ms. Lively -- Ms. Lively's
5 casting was announced, was there a big jump in book
6 sales of It Ends with Us?

7 A I wouldn't doubt it, but I don't know.

8 MS. HUDSON: I'm going to hand you the
9 next exhibit, which will be 5.

10 (Exhibit 5 marked for identification.)

11 THE WITNESS: Yes, thank you.

12 BY MS. HUDSON:

13 Q Exhibit 5 is an email from Ms. Giannetti
14 to Tom Rothman, Sanford Panitch, and Josh Greenstein
15 dated January 30, 2023. The subject: "Colleen
16 Hoover's Publisher." Bates-stamped SPE_WF2010
17 [sic].

18 Do you recognize this email,
19 Ms. Giannetti?

20 A Sure.

21 Q This is an email you sent?

22 A Yeah, yeah. I mean, I clearly sent it.
23 Yeah.

24 Q And in the text of the email, it says:
25 (As read):

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1 "Head of Atria - publisher of
2 It Ends with Us - emailed the book is
3 back to #1 on Amazon given Blake/movie
4 announcement."

5 Does this refresh your recollection that
6 there was a jump in book sales --

7 A Yes.

8 Q -- once Ms. Lively was cast?

9 A Yes.

10 MS. HUDSON: You can set that aside.

11 We've been going for about an hour,
12 should we take a quick break?

13 THE WITNESS: Sure.

14 THE VIDEOGRAPHER: The time is 11:08 a.m.
15 Off record.

16 (Recess.)

17 THE VIDEOGRAPHER: The time is 11:26 a.m.
18 We're back on record.

19 MS. HUDSON: And I would just like to
20 note for the record that we have a new participant
21 on Zoom, Justin Baldoni.

22 BY MS. HUDSON:

23 Q Ms. Giannetti, is it your understanding
24 that when actors are cast for a film, they're
25 provided with a script?

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1 A Yes.

2 Q And is it important for actors to have a
3 script to understand the nature of the film and
4 their role?

5 MR. FREEDMAN: Objection.

6 THE WITNESS: What is the question again?

7 BY MS. HUDSON:

8 Q Is it important for actors to have a
9 script to understand the nature of the film and
10 their role?

11 A Yes, they have to have a script.

12 Q And typically, if the script is changed
13 after the actor signs on to the film, does the actor
14 have to give consent?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: Yes, if the approved
17 screenplay for shooting changes, yes. Materially,
18 has to have material changes.

19 BY MS. HUDSON:

20 Q And in your view, what -- what kind of
21 things constitute material changes?

22 MR. FREEDMAN: Objection.

23 THE WITNESS: They have a broken leg.
24 They're -- a material change to the character or a
25 material change to the movie would be a pretty -- it

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1 would have to be significant.

2 BY MS. HUDSON:

3 Q And do actors typically, to your
4 understanding, have a script approval rights
5 negotiated as part of their contract?

6 MR. FREEDMAN: Objection.

7 THE WITNESS: My understanding is once a
8 screenplay is approved, that is the document moving
9 forward. And if there are material changes to the
10 character or to the story, they have to be consulted
11 and agree to material changes. But there's a lot of
12 changes that can happen that are not material.

13 BY MS. HUDSON:

14 Q And what kind of changes would you
15 consider not material?

16 A Location changes, an added supporting
17 character, an added scene but it's still in the
18 spirit of the movie.

19 Q What about adding additional sex scenes?

20 A Yes, that would be material.

21 Q Do you recall when filming began on
22 It Ends with Us?

23 A Yeah.

24 Q When was it?

25 A January.

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1 Q And by "the strike," you mean what?

2 A The writers' strike.

3 Q And why did the writers' strike shut the
4 production down?

5 A They were picketing and trying to find
6 locations where we were shooting. And they were
7 picketing, and people were uncomfortable crossing
8 the picket line.

9 Q During this first phase of the
10 production, it sounds like it was about six weeks;
11 is that right?

12 A Yes.

13 Q During this first phase of the
14 production, how often did you go to the set, if
15 ever?

16 A I'd have to pull up my travel -- I was
17 there in the beginning. I can't tell you the amount
18 of days. I can remember it more, like, what scenes
19 were shot that I was and present for. Maybe I -- in
20 this first section, maybe I visited three times.

21 Q And when you went to the set, what was
22 the purpose of your visit?

23 A Just really to say hello, check in. It
24 wasn't required that I be there, but I was invested.

25 Q And other than visiting the set, what was

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1 the -- what were the nature of your other
2 interactions with the production team during this
3 period, May 15th through June 30th?

4 A You know, mostly it was approving any
5 script changes, reviewing dailies, discussing
6 dailies and performance with Justin. There was an
7 incident on the first day about paparazzi and the
8 reaction, kind of dealing with that. A lot of
9 wardrobe.

10 Q So this is when you were on the set or
11 not on the set?

12 A Both.

13 Q Okay. So and how did you interact when
14 you were not on the set? Was it by Zoom, email,
15 same as before?

16 A Yeah, a lot of texts and phone calls.
17 There was a lot less time.

18 Q And where was the movie shot during this
19 period?

20 A New Jersey.

21 Q And where were you?

22 A Los Angeles.

23 Q So other than the time -- the three times
24 you went to the set, you were in Los Angeles?

25 A Correct.

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1 Q The times that you went to the set, were
2 you there for more than one day?

3 A Yeah.

4 Q How many days typically?

5 A Maybe three.

6 Q So during the course of the six weeks,
7 you had three trips where you were on the set three
8 days?

9 A I don't know for sure. I could get you
10 that information, but I don't remember. But I --
11 you know, maybe three, maybe four at most. I -- I
12 tend to try and not stay too long.

13 Q And why is that?

14 A Because my life is in Los Angeles.

15 Q And what did you typically do when you
16 were on set?

17 A Just watch. Just be at video village in
18 between filming, talk to the producers, talk to
19 Justin, talk to the actors.

20 Q And what was your purpose of being there?

21 A Mostly encouragement. Support.

22 Q Were -- was part of your role to protect
23 Sony's investment?

24 A Sure.

25 Q Was anyone else from Sony consistently on

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1 related to issues raised by Ms. Lively, correct?

2 A Those two -- well, just that Ms. Lively
3 and I disagreed about wardrobe.

4 Q Okay.

5 A But subjective, creative disagreements.
6 We just disagreed.

7 Q Any issues with the production related to
8 Mr. Baldoni or Mr. Heath during this time period?

9 A Not that I can recall.

10 MS. HUDSON: All right. So I think we've
11 been going for about an hour, and this probably is
12 going to be a good time to break for lunch before I
13 get into the next section, if that's okay for
14 everyone.

15 THE VIDEOGRAPHER: The time is 12:17 p.m.
16 Off record.

17 (Lunch recess.)

18 THE VIDEOGRAPHER: The time is 1:33 p.m.
19 We're back on record.

20 BY MS. HUDSON:

21 Q Hello, Ms. Giannetti. Any reason you
22 can't continue to give your best testimony here?

23 A No.

24 MS. HUDSON: I will hand you what will be
25 Exhibit 12.

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1 (Exhibit 12 marked for identification.)

2 THE WITNESS: Thank you.

3 BY MS. HUDSON:

4 Q Exhibit 12 is a text chain between
5 Ms. Lively and Ms. Giannetti dated May 25th
6 through May 26th, 2023, BL7953.

7 Ms. Giannetti, do you recognize this text
8 chain?

9 A Yes.

10 Q And you recognize this as a text chain
11 between you and Ms. Lively?

12 A Correct.

13 Q In the second entry here from Ms. Lively
14 at the end of the sentence, she says:

15 (As read):

16 "But let's attach up in general"?

17 A Uh-huh.

18 Q And then you say:

19 (As read):

20 "I can make any time tomorrow work."

21 Do you see that?

22 A I do.

23 Q And it looks like you play a little phone
24 tag with her for a document; is that right?

25 A It looks like it.

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1 Q And then at the end, you say:

2 (As read):

3 "I will say what I did want to
4 review/discuss feels very, very small
5 in light of today's news. I'm so
6 sorry. Calling you in moments."

7 Do you see that?

8 A I do.

9 Q Did you call Ms. Lively on this day?

10 A I can't recall but most likely.

11 Q And the day is May 26th, right?

12 Correct?

13 A I see -- I see that on the -- I see that
14 on the -- on the printout, yeah.

15 Q And do you recall what it was that you
16 wanted to review and discuss with Ms. Lively?

17 A I think it was wardrobe.

18 Q And you say that:

19 (As read):

20 "In light of today's news, that seems
21 very, very small."

22 Right?

23 A That's what I wrote, yes.

24 Q What was "today's news"; do you recall?

25 A I believe it was that she had been

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1 exposed to COVID and was worried that the baby might
2 have COVID.

3 Q And how did you learn that?

4 A I don't remember where I learned it
5 first.

6 Q Did you talk with Ms. -- did Ms. Lively
7 tell you that herself?

8 A Yes. We definitely talked about it.

9 Q Did you talk about it before this call?

10 A I don't remember.

11 Q And you said you think you probably did
12 have a call with her on May 26th, then?

13 A If I said "I'm calling you in moments," I
14 would have called her in moments.

15 Q Sitting here today, do you have a
16 recollection of that phone call?

17 A Exactly, no.

18 Q Do you have a general recollection of it?

19 A I have a general recollection.

20 Q And generally, what do you recall?

21 A I remember -- I mostly remember her being
22 very concerned about the COVID. And if I'm correct,
23 I -- I don't know if it was before or after. I'm
24 not great with the timing. But I recall that she
25 had been in the hospital, and the baby had been in

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1 the hospital with RSV. And so this -- you know,
2 this -- that potentially the baby would have COVID.
3 As a mother, that was concern- -- you know, very
4 concerning.

5 Q The phone call, do you recall whether it
6 was just you and Ms. Lively on that phone call?

7 A I think it was just the two of us on the
8 phone call.

9 Q Do you recall how long it lasted?

10 A No.

11 Q Do you recall anything else about the
12 phone call, other than what you described?

13 A Specifically, on this call, I can't -- I
14 know there were many things we were talking about at
15 this time, but I couldn't say for sure exactly.
16 Yeah, I don't -- you know.

17 Q And where were you on May 26th? Were
18 you in Los Angeles?

19 A Yeah, I was in Los Angeles.

20 Q And was it your understanding that
21 Ms. Lively was in New York, New Jersey?

22 A New York. I mean if it was at night, she
23 was probably in New York. Or maybe she was on set
24 if it was a night shoot -- I mean in New Jersey, if
25 it was a night shoot.

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1 Q But not in Los Angeles with you?

2 A No. No.

3 Q And you said that there were many things
4 you were talking about at the time. What are you
5 referring to?

6 A We were constantly talking about the
7 script. I believe this is -- this is around the
8 time she started to have criticisms of the first AD,
9 how the set and schedule was laid out. We were
10 having ward- -- still going back on forth on
11 wardrobe. Those are what I remember being the --
12 some of the things we talked about.

13 Q When you said "some of the things we
14 talked about," you mean at this time period, but you
15 may not mean specifically on this call?

16 A I'm pretty sure the first AD came up on
17 this call.

18 Q Is there anything else you are pretty
19 sure came up on that call?

20 A I can't say for sure either way, to be
21 honest. I can't remember.

22 Q Do you recall, during this time period,
23 Ms. Lively raising any concerns about Mr. Baldoni
24 specifically?

25 A Oh, I'm sure she did.

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1 Q Do you recall her doing so to you?

2 A I recall her doing that frequently. So
3 it would be -- I don't recall this exact phone call.
4 But it is safe for me to assume she brought it up on
5 this call, too.

6 Q Okay. So you -- she was raising issues
7 about Mr. Baldoni to you frequently prior to
8 May 26th?

9 A Yes.

10 Q Okay. Do you recall her raising issues
11 about Mr. Heath?

12 A Less so.

13 Q Do you recall whether she raised issues
14 to you regarding Mr. Baldoni or Mr. Heath on this
15 May 26th call?

16 A I can't remember May 26th as a date in
17 my mind, so I can't -- I can't answer that, that I
18 can remember that specifically.

19 Q So generally during this time period,
20 what do you recall -- what concerns do you recall
21 Ms. Lively raising with you about Mr. Baldoni?

22 A She did not think he was experienced. Or
23 prepared.

24 Q Anything else?

25 A No.

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1 Are there other issues that Ms. Lively
2 raised to you about Mr. Baldoni at some other time,
3 that you recall?

4 A Could you be more specific?

5 Q Well, I can't because if there were
6 issues she raised to you, you would know that. So
7 I'm asking you --

8 A It always fell --

9 Q -- if you were --

10 A It fell into the category of unprepared,
11 indecisive, and inexperienced.

12 Q Those are the only issues that you recall
13 her raising to you at any time regarding
14 Mr. Baldoni?

15 A She had other criticisms.

16 Q What were they?

17 A It was too loose on the set.

18 Q What else?

19 A He was too sensitive.

20 Q Too sensitive?

21 A Yes.

22 Q Anything else?

23 A I'm sure, but I can't recall the
24 specificity of that.

25 Q And do you recall when Ms. Lively raised

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1 those specific issues with you, that Mr. Baldoni was
2 too loose, too sensitive?

3 A By "loose," I mean casual, too casual.
4 Early on, she was sharing about the too casual. The
5 sensitive thing was later.

6 Q Did she tell you what she meant by either
7 of these two things, too loose and too sensitive?

8 A I will take sensitive first. She felt as
9 though when she would make a complaint to him, that
10 he would be hurt by it. And then she would have to,
11 like, buck him up and make him feel better so that
12 they could go on with the scene or get on with the
13 work.

14 Q Did she say anything else to you on
15 that -- in that regard?

16 A No. That was what she meant. That's --
17 "sensitive," I don't know if that's the right word.
18 But that -- that's what she complained about.

19 Q Did she ever raise any specific incidents
20 with respect to Mr. Baldoni in his behavior towards
21 her to you?

22 A It was a lot on that theme. She would
23 have a criticism, and he wouldn't take it well.
24 He'd be hurt by it, and then she felt like she had
25 to, like, go in and buck him up.

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1 A The example she gave over and over again
2 were about the first AD and about scheduling and the
3 time that she would be called in and the hair and
4 makeup and -- and -- that a lot of the reasons if
5 there was lateness on that day, it was the first
6 AD's fault.

7 Q Anything else that you recall Ms. Lively
8 reporting to you in the category of "too loose"?

9 A No.

10 Q So have you now told me about all of the
11 things that you recall Ms. Lively complaining about
12 to you about Mr. Baldoni?

13 A That I can recall in this moment, yes.

14 Q Going back to Mr. Heath. You said there
15 was a issue regarding the showing of the birth of
16 his child?

17 A Uh-huh.

18 Q Tell me what you recall about that?

19 A I was on set. I was not there -- I was
20 not present when it happened, even though I was on
21 set. I believe Jamey came to me first and said he
22 showed the video; Justin asked him to show the
23 video. And she was surprised and did not -- I don't
24 know how he said -- she didn't take it well.

25 Q Did Mr. Heath describe what he had shown

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1 Ms. Lively?

2 A Did he describe it? No.

3 Q Did -- did you, at some point, talk to
4 Ms. Lively directly about that?

5 A Well, yes. There was an interaction. It
6 was very brief. She was -- I think it was we were
7 at lunch, and she walked by and said -- she
8 mentioned the video and being very unhappy about it.
9 I forget her exact words. She said it to me and
10 kept walking.

11 Q Did she tell you what she had seen in the
12 video?

13 A She may have. I don't remember what --
14 the phrasing.

15 Q Did she tell you that Mr. Heath's wife
16 was nude in the video?

17 A She may have.

18 Q Did she tell you that when she first saw
19 the video, she didn't know what she was looking at
20 and thought it was pornography?

21 A No, she did not say that.

22 Q Did she tell you that she saw Mr. Heath's
23 wife's genitals in that video?

24 A She did not say that.

25 Q But you do recall her maybe saying that

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1 his wife was nude in the video?

2 A She could have said that, yeah.

3 Q Did she ask you to do anything about it?

4 A She did not.

5 Q Did you think you should do anything
6 about it?

7 A No. I saw the video.

8 Q What did you see?

9 A I saw a woman in a tub giving birth.

10 Q What exactly did you see? Was it -- was
11 she naked?

12 A I knew she was naked. There was water.
13 I don't remember seeing any genitalia.

14 Q Did you -- when you say "giving birth,"
15 did you see a baby crowning?

16 A No. I don't remember that.

17 Q You remember a woman alone in the tub?

18 A No. I think someone's behind her,
19 holding her.

20 Q Do you know whether -- well, let me ask
21 you this: How did -- how did you see the video?

22 A Jamey showed it to me.

23 Q And how do you know that the video you
24 saw was the same video that Ms. Lively saw?

25 A I don't.

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1 Q Did you think the video that Mr. Heath
2 showed you with his nude wife in the tub was an
3 appropriate thing to show in a workplace?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: No.

6 BY MS. HUDSON:

7 Q And why not?

8 A Well, can I -- they -- it was my
9 understanding they were talking about the birthing
10 scene. It didn't come out of nowhere. They were
11 talking about a birthing scene and so -- wanted to
12 share it. The thing that I think is the
13 inappropriate part is that before showing the video,
14 no one stopped to say "we have a video of my wife
15 giving birth in a tub; would you like to see it?"
16 That -- that should have been done before showing a
17 video.

18 Q So you think they should have gotten
19 consent from Ms. Lively before showing her a video
20 of Mr. Heath's naked wife in a tub?

21 MR. FREEDMAN: Objection.

22 THE WITNESS: That would have been a
23 smart thing to do, yes.

24 BY MS. HUDSON:

25 Q And did you understand how Ms. Lively

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1 might have been uncomfortable seeing that video, not
2 anticipating and giving consent in advance?

3 A Yes.

4 Q Other than learning about the video from
5 Ms. Lively and Mr. Heath, is there anything else
6 that occurred with -- from your end with respect to
7 that video?

8 A I don't think so, no.

9 Q Did you tell Mr. Heath not to do things
10 like that?

11 A I think I did.

12 Q Did you tell anyone in human resources at
13 Wayfarer that Mr. Heath had shown Ms. Lively a video
14 of his wife nude in a tub giving birth?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: No.

17 BY MS. HUDSON:

18 Q And you didn't think that was important
19 to do?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: I thought it was a
22 misunderstanding. I thought Jamey -- I believed
23 Jamey when he said Justin told him to show the video
24 because they were discussing the birthing scene.
25 And I believe when Jamey showed her the video, it

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1 had been prepped, and that was -- so I believe the
2 intention -- I believed it was a mistake.

3 Q When did you see the video?

4 A I can't remember. I think it might have
5 been after. I think -- I can't tell you that I
6 really know.

7 Q Now, you mentioned that -- a trailer
8 incident.

9 A Yeah.

10 Q What happened there?

11 A I was told Jamey had to discuss something
12 with Ms. Lively. He knocked on the door. He told
13 me he heard "come in." He went in. And then I
14 heard that Ms. Lively did not say "come in" so was
15 surprised he came in. Then I believe -- I could be
16 wrong about this -- but I believe she then was
17 like -- I don't know if she was getting body makeup
18 removed or breast feed- -- I don't remember what was
19 happening. But then I think she said he could stay.

20 Anyway, it was definitely a
21 miscommunication, and she made it very clear that
22 she was uncomfortable. I felt this fell into the
23 "loose" -- it was a "loose set." And she wanted --
24 and she wanted to have a meeting about it. And we
25 did at the end of the day in her trailer.

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1 his wife was nude in the video?

2 A She could have said that, yeah.

3 Q Did she ask you to do anything about it?

4 A She did not.

5 Q Did you think you should do anything
6 about it?

7 A No. I saw the video.

8 Q What did you see?

9 A I saw a woman in a tub giving birth.

10 Q What exactly did you see? Was it -- was
11 she naked?

12 A I knew she was naked. There was water.
13 I don't remember seeing any genitalia.

14 Q Did you -- when you say "giving birth,"
15 did you see a baby crowning?

16 A No. I don't remember that.

17 Q You remember a woman alone in the tub?

18 A No. I think someone's behind her,
19 holding her.

20 Q Do you know whether -- well, let me ask
21 you this: How did -- how did you see the video?

22 A Jamey showed it to me.

23 Q And how do you know that the video you
24 saw was the same video that Ms. Lively saw?

25 A I don't.

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1 A In her trailer.

2 Q Okay. And how -- who -- who else was in
3 that meeting?

4 A Okay. It was me, Alex Saks, Jamey,
5 Blake, and I don't know if Justin was there or not.
6 I can't remember.

7 Q Okay. Do you recall anything else that
8 was said by anyone in that room at that meeting?

9 A I recall Jamey apologizing. And I recall
10 Blake being very clear about entering the trailer
11 and not entering the trailer and her privacy. And
12 she was -- she was very clear.

13 Q Was she very upset?

14 A She seemed upset, yeah.

15 Q And did Ms. Lively tell you that not only
16 did she not give Mr. Heath permission to enter the
17 trailer, that she actively told him not to come in?

18 A She may have.

19 Q Did she also tell you that he insisted on
20 coming in, notwithstanding her request for him not
21 to, and said that if they were going to have a
22 meeting, it had to happen then or not at all?

23 MR. FREEDMAN: Objection.

24 THE WITNESS: I don't recall. She may
25 have.

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1 Q Do you know whether this May 26th phone
2 call, Ms. Lively took any notes of it?

3 A I don't know that she did.

4 MS. HUDSON: I am going to hand you what
5 will be Exhibit 13. Exhibit 13 is a photograph of
6 handwritten notes dated May 26th, 2023,
7 Bates-stamped BL33431. Okay.

8 (Exhibit 13 marked for identification.)

9 Q Have you seen this document before,
10 Ms. Giannetti?

11 A I have not.

12 Q I'm going to represent to you for the
13 record that these are notes of Ms. Lively's call
14 with you on May 26th.

15 A Okay.

16 Q So I'm just going to ask you some
17 questions about some of the things that are on here
18 and ask you if you recall her discussing this during
19 this call. Okay?

20 A Okay.

21 Q So the third dash down, it says "Jamey
22 naked wife." Do you see that?

23 A I do. Well, I -- I couldn't read that,
24 but I believe that's what it says.

25 Q Okay. All right. So do you -- do you

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1 recall whether on this call, you spoke -- Ms. Lively
2 spoke to you again about the issue of the birth
3 video?

4 A I don't recall it, but I don't deny it.

5 Q Were there any other incidents involving
6 Mr. Heath's naked wife other than that, that you're
7 aware of?

8 A Not that I'm aware of.

9 Q And then, underneath that, it says -- the
10 next dash -- "JB inappropriate comments to me and
11 others." Do you see that?

12 A I do.

13 Q Do you know what inappropriate comments
14 Ms. Lively was referring to?

15 A I believe -- but I don't know the timing,
16 so I would have to look back -- but I believe he
17 called Jenny Slate "sexy" when she was dressed in
18 character on set and -- I think that's what that
19 refers to.

20 Q Did he -- do you know what
21 inappropriate -- did Ms. Lively talk to you about
22 any inappropriate comments Mr. Baldoni made to her?

23 A Not that I can recall.

24 Q Did she talk to you, during this call,
25 about Mr. Baldoni improvising physical intimacy that

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1 was not scripted?

2 A Had we shot any intimacy scenes? I
3 didn't think we had shot any sex scenes until we
4 came back, so --

5 Q Well, I didn't say sex.

6 A Oh.

7 Q I said "physical intimacy." So let me
8 ask you the question again.

9 Well, let's do this. When I say
10 "physical intimacy," you're think- -- that that's
11 referring to sex?

12 A Yes. The movie's a romance movie, so
13 that was -- yeah, that's immediately what I go to.

14 Q Do you -- could physical intimacy also
15 mean kissing or other touching?

16 A Sure.

17 Q Okay. Did Ms. Lively, during this call,
18 raise any issues with you about Mr. Baldoni
19 touching, kissing, or otherwise interacting with her
20 physically in ways that were not scripted?

21 A She might have.

22 Q She might have?

23 A She might have.

24 Q Okay. Is that a topic that you recall
25 her raising with you at some point?

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1 A Yeah, I think so, yeah. I'm trying to
2 figure out -- anyway...

3 THE VIDEOGRAPHER: I apologize, Counsel.
4 If you don't mind raising your microphone a little
5 bit higher, that would be appreciated.

6 Thank you, ma'am.

7 BY MS. HUDSON:

8 Q During this phone call, did Ms. Lively
9 raise anything to you about Mr. Baldoni telling her
10 he had a pornography addiction?

11 A I did not know -- no.

12 Q Okay. Did she raise that with you at any
13 time, to your recollection?

14 A I don't recall.

15 Q Did Ms. Lively raise to you, during this
16 phone call, any issue related to Mr. Baldoni calling
17 her trainer and asking her about -- and asking her
18 trainer about her weight?

19 A I remember hearing about that from
20 Justin.

21 Q So Justin came to you first before you --
22 Ms. Lively did?

23 MR. FREEDMAN: Objection.

24 THE WITNESS: I believe so.

25

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1 A No. I would have remembered that.

2 Q Okay. So having -- do you recall whether
3 you -- Ms. Lively asked you to do anything about
4 these various issues she was raising to you at the
5 time, including May 26th?

6 A Yes. She asked me for help in getting
7 rid of the first AD.

8 Q Did -- she didn't ask for anything else?

9 A No.

10 Q Did she tell you that she wanted to file
11 an HR complaint?

12 A She did not. Oh. She may have over
13 COVID.

14 Q So you recall her telling you that she
15 wanted to file an HR complaint with Sony?

16 A I recall that, actually, in person, not
17 on the phone.

18 Q So there was a time in person she told
19 you she wanted to file an HR complaint with Sony?

20 A She didn't use the words "H" -- I don't
21 remember her using the words "HR." She was very
22 upset about the COVID and did not think the COVID
23 protocols were being followed. And she wanted to
24 have Sony get into it. And I said, "We don't run
25 the movie." The way protocols are done are with

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1 Q Did you help replace the first AD?

2 A Yes, I did.

3 Q And do you know whether anyone else
4 thought that there was a problem with the first AD?

5 A I think Alex Saks thought there was a
6 problem with the first AD.

7 Q Did anyone else speak with you about
8 concerns they had with Mr. Baldoni or Mr. Heath?

9 A Define "concern." There is a lot of
10 complaining on a set. There is a lot of
11 personalities. Yeah, I think Alex -- probably Alex
12 Saks.

13 Q Did Jenny Slate?

14 A Yes, Jenny Slate. Yes, the "sexy"
15 comment.

16 Q Did Jenny Slate's manager?

17 A I will tell you about the conversation
18 with Jenny Slate's manager. Jenny Slate's manager
19 called me and, in a very general way, asked me,
20 like, "What's going on, on that set?" She didn't
21 get into anything specific. She just said, "What's
22 going on?" And -- and she intimated Jenny and --
23 and Blake had concern. She didn't know really what
24 it was. And I -- and I just said to the manager,
25 "Have Jenny call me. She can call me directly.

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1 done."

2 Is that what Ms. Lively told you?

3 A I don't recall.

4 Q But you don't have any reason to dispute
5 Ms. Lively's account?

6 A No.

7 Q And you mentioned that Alex had some --
8 Alex Saks had concerns. What were those?

9 A Alex Saks's main concern is that she felt
10 sidelined. She was used to running her own shows,
11 producing her own shows. She was brought on this,
12 and she felt like it was not her set to run, was the
13 main one, as far as I know.

14 Lacaab. I got that wrong.

15 Q Do you want to correct something?

16 A Yeah. I thought -- I thought Justin had
17 said she looked sexy. And it says here:

18 (As read):

19 "You were standing there for the thing,
20 and he said to me, he said, 'I look
21 hot.'"

22 Q Who is -- who is that that you're reading
23 from?

24 A Jenny.

25 Q Jenny.

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1 A I got a quote that said.

2 Q And did you end up speaking with
3 Ms. Slate?

4 A Yeah, she called.

5 Q And what did -- when did that
6 conversation take place?

7 A I think it was the same night I spoke to
8 the manager. I think.

9 Q Was that May 27th?

10 A Maybe.

11 Q And do you know whether Ms. Slate spoke
12 with Alex Saks as well?

13 A I think she did.

14 Q Going back to your conversation with
15 Ms. Slate, what did she tell you? Before you -- was
16 this a phone call, or was this in person?

17 A It was a phone call.

18 Q It was just the two of you?

19 A Yes.

20 Q And how long did that phone call last?

21 A Not long.

22 Q Okay. And what did Ms. Slate tell you?

23 A In -- in -- in -- what I remember
24 generally, I remember some things generally and some
25 things specifically.

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1 Generally, I remember her having unease
2 on the set, talking about how Blake had great --
3 had -- Blake had a lot of concerns. She shared them
4 with Jenny. Jenny had the experience of the "hot"
5 comment. And it just -- the -- it felt tense. You
6 know, things felt tense on set. She was very --
7 honestly, she was very all over the place and
8 wishy-washy about it a little bit. And I -- the
9 part I really specifically remember is asking her at
10 the end, "Are you asking me to do something?" And
11 she said, "No. My manager said I should call you."

12 Q And you didn't feel, after hearing that
13 both Ms. Slate and Ms. Lively were uncomfortable,
14 that there was something you should do, whether
15 asked or not?

16 A To date, Jenny Slate told me the director
17 told her she looked "hot" in costume. No, I did not
18 think anything from that needed to go to HR. And
19 the majority of Blake's concern -- the majority of
20 them were the running of the set, his inexperience,
21 the first AD, the COVID. And there were these
22 other -- the incident of the video and the trailer.
23 But, no, I did not think there was -- I thought it
24 was a shit show, but I did not think it was...

25 Q Also, Alex Saks felt sidelined as well,

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1 right?

2 MR. FREEDMAN: Objection. Could you let
3 her finish her answer?

4 BY MS. HUDSON:

5 Q I'm sorry. Were you still -- was there
6 more you were saying?

7 A I thought it was a shit show, and there
8 was -- those incidents alone were not reason to call
9 HR for a movie that we were cofinancing and
10 distributing.

11 Q How many women on a set have to be
12 uncomfortable before you think it rises to the level
13 of calling HR?

14 MR. FREEDMAN: Objection.

15 THE WITNESS: They didn't like him.

16 BY MS. HUDSON:

17 Q What do you mean by that?

18 A They didn't like him.

19 Q So you discounted their views on him?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: I heard of three incidents.
22 You can ask me this a hundred times, I'm going to
23 tell you the three incidents I know over and over
24 again.

25 The video, I saw the video. The trailer,

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1 we had a meeting in the trailer. It was resolved.
2 And the director called Jenny Slate "hot" in front
3 of 300 people on set. Those were the three
4 incidents. No, I did not think there was reason to
5 call HR.

6 MS. HUDSON: Okay. Let's take a look at
7 Exhibit 16. This is a text chain between Alex Saks
8 and Ange Giannetti dated May 29th, 2023,
9 Bates-stamped SPEBL2023.

10 (Exhibit 16 marked for identification.)

11 BY MS. HUDSON:

12 Q Do you recognize this as a text chain
13 between you and Ms. Saks?

14 A I do.

15 Q Okay. If you go to the beginning, Ms. --
16 you say to Ms. Saks:

17 (As read):

18 "Call you when" -- "call when you can,
19 xx."

20 Do you see that?

21 A I do.

22 Q And Ms. Saks says:

23 (As read):

24 "Finishing up brunch with Jenny."

25 Do you see that?

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1 Q Did you learn, at some point, that there
2 was a meeting with Alex Saks, Justin Baldoni,
3 Mr. Heath, and Blake Lively?

4 A You'd have to be more specific.

5 Q Was there a meeting following all of
6 these phone calls and discussions with Mr. Heath,
7 Mr. Baldoni, Alex Saks, and Blake Lively?

8 MR. FREEDMAN: Objection.

9 BY MS. HUDSON:

10 Q That you're aware of?

11 A About the Jenny Slate?

12 Q About the various incidents we've
13 discussed?

14 A The first AD?

15 Q Well, we've discussed more than that. Do
16 you recall Ms. Saks reporting to you about a meeting
17 that she had with --

18 A There were so many. You'd have to be
19 more specific.

20 MS. HUDSON: Okay. Let's take a look at
21 Exhibit 17?

22 THE STENOGRAPHIC REPORTER: Yes.

23 (Exhibit 17 marked for identification.)

24 BY MS. HUDSON:

25 Q This is a text chain between you and

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1 Alex Saks dated June 1st, 2023, SPEBL2026.

2 Is this a -- do you recognize this as a
3 text chain between you and Ms. Saks?

4 A I do.

5 Q And in this text chain, is Ms. --
6 Ms. Saks reporting to you about a meeting that she
7 had with Ms. Lively, Mr. Heath, and Mr. Baldoni?

8 A I need a minute to read it.

9 Q Sure.
10 I'm going to go to this and ask you
11 specific questions.

12 A Okay.

13 Q Okay? The -- at 9:35 a.m., Ms. Saks says
14 "We had a very good tough chat with Blake. She was
15 eloquent and on point. Called Jamey out in front of
16 me and Justin kindly but was very direct. It was
17 impressive to watch."

18 Do you see that?

19 A I do.

20 Q Okay. So does this refresh your
21 recollection that Ms. Lively -- that Ms. Saks told
22 you about a meeting with her, Ms. Lively,
23 Mr. Baldoni, and Mr. Heath?

24 A It doesn't refresh it, but I -- I see
25 that it happened.

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1 don't look. And apparently, he was looking in her
2 direction the entire conversation when she turned
3 around.

4 Do you see that?

5 A I do.

6 Q And your response was, "not good," and
7 you capitalized each letter of "not," right?

8 A Uh-huh.

9 Q What did you mean by that?

10 A I mean, if that happened, that would not
11 be good.

12 Q Okay. Why would that not be good?

13 A She was in a state of undress.

14 Q And then if you go to the next page, the
15 one Bates stamped 2030, there is a text chain at the
16 top it says from Ms. Saks,

17 (As read):

18 "I'm ready to bring a new AD team in."

19 Do you see that?

20 A I'm sorry, what page is this?

21 Q 2030.

22 A Oh, yeah. Yes, I see that at the top.

23 Q Ms. Saks says, "I'm ready to bring a new
24 AD team in." You mentioned that she also wasn't
25 happy with the AD team?

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1 A Correct.

2 Q And she describes to you some issues with
3 the AD team and you respond, "How is that possible?
4 Two people in the scene. Exactly."

5 Did you also think that the AD team had
6 some issues?

7 A I'm going to be honest, I don't know -- I
8 didn't know if it was an AD team issue, if it was a
9 Justin planning issue, if it was a DP issue. I knew
10 that there was an issue, you know, that it would
11 take that -- I mean, it's not crazy that it takes
12 two hours before you get a shot off on a set, but
13 that does seem like a -- it's an interior location
14 and you're not dealing with weather.

15 Q At the bottom, Ms. Saks -- you ask
16 Ms. Saks at 10:14 a.m.

17 "What does Justin say? And Ms. Saks
18 response:

19 Nothing."

20 Do you see that?

21 A At what time? I'm sorry.

22 Q 10:14.

23 A Oh, yeah. Okay.

24 He says "nothing."

25 Q And Ms. Saks says, Just looks blankly,

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Yeah, I mean -- yeah, it
3 says here there will be one, but I did not -- I
4 didn't remember that we had to have it, and I didn't
5 know that it was scheduled at the end --

6 BY MS. HUDSON:

7 Q When did production start?

8 A January 5th.

9 Q Okay. And when was the meeting?

10 A January 4th.

11 Q Okay. And at the January 4th
12 meeting...

13 MS. HUDSON: I'm going to hand you
14 another document.

15 THE WITNESS: Okay.

16 THE STENOGRAPHIC REPORTER: Exhibit 20
17 for the record.

18 (Exhibit 20 marked for identification.)

19 MS. HUDSON: Okay.

20 MR. FREEDMAN: Time check?

21 THE VIDEOGRAPHER: Three hours, thirteen
22 minutes.

23 THE WITNESS: Thank you.

24 BY MS. HUDSON:

25 Q Ms. Giannetti, this is Ms. Lively's

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1 complaint in this lawsuit, her current complaint.

2 A Uh-huh.

3 Q I'm going to have you turn to page 7,
4 paragraph 20.

5 It says --

6 A I see it. Yup.

7 Q (As read):

8 "During the January 4th meeting, the
9 parties discussed in detail the
10 inappropriate conduct that Ms. Lively,
11 her employees, and other cast and crew
12 experienced at the hands of Mr. Baldoni
13 and Mr. Heath. Ms. Lively read the
14 list below in its entirety. And after
15 a discussion, all parties present
16 agreed that the outlined conduct would
17 cease."

18 Take a look at this list, which continues
19 onto page 2. Do you recall Ms. Lively raising these
20 issues at -- at the January 4th meeting?

21 MR. FREEDMAN: Objection.

22 Go ahead.

23 MS. HALLINAN: You can take your time to
24 read through this.

25

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1 BY MS. HUDSON:

2 Q Having looked at that, do you recall
3 Ms. Lively reading from a list like that during the
4 meeting?

5 MR. FREEDMAN: Sorry. Can I get that
6 read back? I just didn't hear it.

7 MS. HUDSON: Okay.

8 BY MS. HUDSON:

9 Q Having looked at the list, do you recall
10 Ms. Lively reading a list like this during the
11 meeting?

12 MR. FREEDMAN: Objection.

13 THE WITNESS: I'm up to number 23, and up
14 to 23, yes.

15 BY MS. HUDSON:

16 Q Okay. And go ahead and finish the
17 remaining --

18 A Okay.

19 Q -- four.

20 A I will do it quickly.

21 Okay.

22 Q Yes. And she mentioned the -- the
23 remainder of the list during the meeting?

24 A I don't remember it exactly, but it's --
25 it seems quite accurate.

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1 Q And that was known from early on; is that
2 correct?

3 A Yeah, it was going to be a very fine line
4 to walk.

5 Q And you, at that time, thought if you
6 were just true to the book, then the movie would be
7 successful; is that correct?

8 MS. HUDSON: Objection.

9 THE WITNESS: Yes.

10 BY MR. FREEDMAN:

11 Q And the book involved sexuality, correct?

12 A Correct.

13 Q In the book, the characters had sex,
14 correct?

15 A Correct.

16 Q And the characters were supposed to have
17 sexual chemistry in the book, right?

18 A Correct.

19 Q And the book contained detailed sex
20 scenes; is that correct?

21 A Correct.

22 Q The book also concerned violence,
23 correct?

24 A Correct.

25 Q Domestic violence was described in detail

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1 in the book; isn't that correct?

2 A Yes.

3 MR. FREEDMAN: Let's go to 24.

4 (Exhibit 24 marked for identification.)

5 THE WITNESS: Thank you.

6 BY MR. FREEDMAN:

7 Q Exhibit 24 is a true and correct copy of
8 a text exchange you sent to Jamey Heath, Justin
9 Baldoni, Alex Saks, and Ashley Marks on March 31st,
10 2023. Who is Ashley Marks?

11 A She's the head of casting for Sony.

12 Q And the text message states, from you:

13 (As read):

14 "This process is poor. We spend time
15 discussing and making a decision and
16 then you just do what Blake wants with
17 no regard for your partner."

18 Do you see that?

19 A I do.

20 Q And what was meant by this message?

21 A I don't know what it was regarding
22 specifically, but this sounds like I am really not
23 happy. It sounds like we made a decision and then
24 the decision got reversed, and it sounds like I did
25 not get consulted on that.

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1 Q Very?

2 A Yes.

3 Q Did you think it was inappropriate for
4 Mr. Rothman to say that Blake Lively wasn't as
5 alluring as she needed to be for the movie?

6 A I think Mr. Rothman thought this was a
7 private communication between him, me, and Sanford,
8 and I do not think it's inappropriate.

9 Q Did it make you uncomfortable?

10 A Not at all.

11 Q Did you think this was harassment?

12 A No.

13 Q We already discussed that phase one of
14 the principal photography began on May 15th, 2023,
15 correct?

16 A Correct.

17 Q And the filming took place in New Jersey
18 during phase one, correct?

19 A Correct.

20 Q There were no other locations, correct?

21 A Correct.

22 MS. HUDSON: Objection.

23 BY MR. FREEDMAN:

24 Q And filming was scheduled to occur, in
25 part, in Las Vegas; isn't that correct?

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1 Q During phase one when you weren't present
2 on the set, you -- were you communicating or
3 speaking to anyone that was working on the set?

4 A Very regularly.

5 Q On a daily basis?

6 A If not every day, every other day. Very
7 closely.

8 Q And who were the people that you were
9 communicating with at that time while you weren't on
10 set?

11 A Jamey, Justin, Alex, and, occasionally,
12 Blake.

13 Q Anyone else?

14 A Maybe the line producer, but I don't
15 think so.

16 Q Let's talk about your communications with
17 Blake Lively during phase one.

18 How often did you communicate with Blake
19 Lively at that time about the film? Daily? Weekly?
20 Monthly?

21 A I can't recall exactly.

22 Q Do you think it was closer to daily or
23 closer to weekly?

24 A It was not daily. And it -- if I
25 remember correctly, it tended to be in spurts.

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1 Q Did she -- did she tell you that she felt
2 uncomfortable about Justin speaking with her -- her
3 and, I think, his trainer?

4 MS. HUDSON: Objection.

5 THE WITNESS: I can't recall if she told
6 me specifically that herself or someone told me that
7 she did.

8 BY MR. FREEDMAN:

9 Q Was that someone Justin?

10 A I think it was everyone. I think it was
11 Justin, Jamey, and Alex.

12 Q Did Justin explain to you why he was
13 asking about what her weight might be?

14 A Yes.

15 Q What did he say to you?

16 A In one of the scenes, he had to lift her.
17 And he had a bad back, and he wanted to know how
18 much she weighed so that he could lift her. And
19 what he did say is, I think, not be embarrassed.
20 Like, he wanted to be able to do the scene.

21 Q And did he explain to you that he was
22 concerned about a back injury that he had suffered?

23 A Yeah, he -- well, he had mentioned that,
24 yeah, he -- he was worried about his back.

25 Q Did you know that he had suffered a back

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1 injury previously?

2 A I didn't.

3 MS. HUDSON: Objection.

4 MR. FREEDMAN: Thirty-three.

5 (Exhibit 33 marked for identification.)

6 BY MR. FREEDMAN:

7 Q Exhibit 33 is a text exchange -- is a
8 text exchange -- it's a text exchange between
9 yourself and Blake Lively on May 15th and 16th.
10 It's Bates-stamped BL7941 and BL7942.

11 Do you know what this text was about?

12 MS. HUDSON: Objection.

13 THE WITNESS: No.

14 BY MR. FREEDMAN:

15 Q Did --

16 A Maybe.

17 Q Sure. What is it about?

18 A I think this is for the end of the movie,
19 and we're supposed to show time passing. Is that --
20 I'm -- I'm not actually sure, actually.

21 Q Did Blake Lively tell you that Justin or
22 Jamey had done anything that made her feel
23 uncomfortable on the set on May 15 or May 16?

24 A I don't recall.

25 Q Did you learn that Blake Lively believed

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1 Q Was Ryan Reynolds her manager?

2 A No.

3 Q He was her husband, correct?

4 A Correct.

5 Q Part of what Blake was complaining about
6 in these protections was what she thought was sexist
7 behavior, correct?

8 A I don't know.

9 Q She asked her husband to talk to her
10 studio on a movie in his capacity as her husband,
11 correct?

12 MS. HUDSON: Objection.

13 THE WITNESS: I don't know.

14 BY MR. FREEDMAN:

15 Q Todd Black was hired as the A-list
16 producer, correct?

17 A Correct.

18 Q Did Wayfarer agree to the 17-point list?

19 MS. HUDSON: Objection.

20 THE WITNESS: I don't know the wording,
21 but yes, we -- we agreed to the protections so she
22 would return to work.

23 BY MR. FREEDMAN:

24 Q Did you talk with anyone about why --
25 anyone at Wayfarer about why they agreed to the

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1 17-point list?

2 A No. I knew why.

3 Q Why?

4 MS. HUDSON: Objection.

5 THE WITNESS: Because there was a
6 tremendous amount of money that had been invested
7 and spent, and we had to finish the movie or it was
8 unreleasable.

9 BY MR. FREEDMAN:

10 Q Did Blake Lively threaten to leave the
11 movie if the 17-point list wasn't signed without
12 alteration or revision?

13 MS. HUDSON: Objection.

14 THE WITNESS: That's my understanding.

15 BY MR. FREEDMAN:

16 Q Do you recall telling Jamey Heath that
17 you thought Blake was a fucking terrorist?

18 MS. HUDSON: Objection.

19 THE WITNESS: Yes.

20 BY MR. FREEDMAN:

21 Q At that point in time, how much money had
22 Sony invested in the movie?

23 A Well, I believe the ingoing budget was 28
24 and change, 28 million and change. We had
25 three weeks left -- I -- I -- I'm -- at least

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1 \$20 million, if not more.

2 Q At that point in time, do you know how
3 much money Wayfarer had invested in the movie?

4 A More than half of whatever that number
5 was. It was more than us.

6 Q Did Blake's efforts to rewrite the script
7 increase at that point in time?

8 MS. HUDSON: Objection.

9 THE WITNESS: Increase -- I don't recall.

10 BY MR. FREEDMAN:

11 Q Did she start adding locations, actors,
12 and adding pages?

13 MS. HUDSON: Objection.

14 THE WITNESS: For the -- the final
15 three weeks?

16 BY MR. FREEDMAN:

17 Q Yes.

18 A I'm sure she did. That was -- that was
19 the process from the beginning. Just

20 Q Did her changes vary from the book?

21 MS. HUDSON: Objection.

22 THE WITNESS: I can't recall the
23 specifics.

24 BY MR. FREEDMAN:

25 Q At that point, did you know whether she

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1 BY MR. FREEDMAN:

2 Q Well, her role in the movie continued to
3 grow, correct?

4 MS. HUDSON: Objection.

5 THE WITNESS: In the -- I -- I didn't
6 notice any change.

7 BY MR. FREEDMAN:

8 Q What about editing?

9 A Well, that's post. You're still talking
10 about production. If we're moving to post, it's a
11 whole different ball game.

12 Q Why do you say "it's a whole different
13 ball game" in post?

14 A Because it's a whole different ball game.

15 Q Can you explain to me what you mean by
16 that?

17 A I'm saying I did not notice a -- any
18 distinct change from Blake on the set before strike,
19 after strike, other than she was happier and we did
20 good work. So that felt more consistent.

21 Post was very not consistent.

22 Q Did you understand that a formal HR
23 process had not yet occurred, as stated in the
24 letter with the 17-point list?

25 MS. HUDSON: Objection.

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1 THE WITNESS: I didn't know about any
2 HR -- I never heard about any HR complaints.

3 BY MR. FREEDMAN:

4 Q So that's a yes?

5 A That's a yes.

6 Q Had Blake Lively made an HR complaint to
7 Sony?

8 MS. HUDSON: Objection.

9 THE WITNESS: Not that I know of.

10 BY MR. FREEDMAN:

11 Q Do you have any reason to believe that
12 Blake Lively had filed an HR complaint with
13 Wayfarer?

14 MS. HUDSON: Objection.

15 THE WITNESS: No.

16 BY MR. FREEDMAN:

17 Q When it says that "The complaints of our
18 client and others have been repeatedly conveyed and
19 well documented throughout preproduction and
20 photography," what did you understand that to mean?

21 MS. HUDSON: Objection.

22 THE WITNESS: That -- that she was very
23 vocal about things that she didn't like.

24 BY MR. FREEDMAN:

25 Q I'm -- I'm referring right now to

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1 Exhibit 19.

2 A Okay. So what's the question?

3 Q I direct your attention to 30 -- what's
4 marked 3514 on the bottom.

5 A 3514. Hold on.

6 Uh-huh.

7 Q And it states in the first paragraph, the
8 last line:

9 (As read):

10 "The complaints of our client and
11 others have been repeatedly conveyed
12 and well documented throughout
13 preproduction and photography."

14 Did -- did you know that to be true?

15 A No.

16 Q Had you seen any documentation of the
17 complaints referred hereto by Ms. Lively?

18 MS. HUDSON: Objection.

19 THE WITNESS: No.

20 BY MR. FREEDMAN:

21 Q Had you seen any of the -- any complaints
22 in writing of anyone else on the set --

23 MS. HUDSON: Objection.

24 BY MR. FREEDMAN:

25 Q -- as of that date?

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1 THE WITNESS: No.

2 BY MR. FREEDMAN:

3 Q Do you know what complaints Lindsey --
4 Lindsey Strasberg was referring to here?

5 MS. HUDSON: Objection.

6 THE WITNESS: No.

7 BY MR. FREEDMAN:

8 Q Was this email and its attachment
9 discussed internally at Sony?

10 A Yes.

11 Q Amongst who?

12 A Myself, Michael Marshall,
13 Sanford Panitch. I was not in rooms with
14 Tom Rothman when it was discussed, but I'm sure they
15 briefed him.

16 Q Okay. What was the conclusion reached at
17 Sony regarding this document?

18 MS. HUDSON: Objection.

19 THE WITNESS: Give her the protections.

20 BY MR. FREEDMAN:

21 Q At some point, did you say, in talking to
22 Wayfarer, Jamey, and Justin, something like,
23 "Listen, we're going to get through this movie.
24 We're going to give her what she wants. We're going
25 to make this film. We're going to get it done

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1 because the only thing that matters is making this
2 film"?

3 MS. HUDSON: Objection.

4 THE WITNESS: Often.

5 BY MR. FREEDMAN:

6 Q Often?

7 A Often.

8 Q At some point, did you discuss -- discuss
9 with Jamey and Justin that Blake Lively's biggest
10 fear is that she will go onto set and not be liked?

11 MS. HUDSON: Objection.

12 THE WITNESS: I -- I don't recall that.

13 BY MR. FREEDMAN:

14 Q Did anyone at Sony discuss this document
15 with Ms. Lively?

16 MS. HUDSON: Objection.

17 THE WITNESS: Not that I know of.

18 BY MR. FREEDMAN:

19 Q Did anyone at Sony discuss this document
20 with Lindsey Strasberg?

21 MS. HUDSON: Objection.

22 THE WITNESS: Not that I know of.

23 BY MR. FREEDMAN:

24 Q Did anyone at Sony discuss this document
25 with David Weber?

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1 MS. HUDSON: Objection.

2 THE WITNESS: I don't know.

3 BY MR. FREEDMAN:

4 Q Do you know who David Weber is?

5 A Yes.

6 Q Did anyone at Sony discuss this document
7 with anyone at Wayfarer?

8 MS. HUDSON: Objection.

9 THE WITNESS: I believe Michael Marshall
10 discussed it with Wayfarer.

11 MR. FREEDMAN: Okay. Take a short break.

12 THE WITNESS: Yeah.

13 THE VIDEOGRAPHER: The time is 6:48 p.m.
14 Off record.

15 (Recess.)

16 THE VIDEOGRAPHER: The time is 7:08 p.m.
17 We're back on record.

18 BY MR. FREEDMAN:

19 Q Good evening now.

20 A Good evening.

21 Q Were you invited to attend a meeting on
22 January 4, 2024 at Blake's apartment?

23 A I believe I asked for that meeting.

24 Q You asked for that meeting?
25 Was that supposed to be the

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1 return-to-work production meeting?

2 A I thought it was a script meeting.

3 Q Did anyone tell you before what you were
4 walking into?

5 MS. HUDSON: Objection.

6 THE WITNESS: No. But Blake did say,
7 when we confirmed time and the place, that she --
8 you know, she wanted to do a clearing of the air at
9 the beginning. And I was like, great.

10 BY MR. FREEDMAN:

11 Q Were you surprised by what you heard at
12 the meeting?

13 A Very.

14 Q What surprised you about it?

15 A Many things surprised me. I was
16 surprised at the beginning that Ryan was joining the
17 meeting because I thought we were going to be
18 talking about the script and the schedule.

19 And then they asked for the line producer
20 to leave because we had had the -- was it the line
21 producer or the -- I don't know. We had someone
22 technical from the set to leave. Which was fine.

23 And then -- and then she proceeded to
24 read a list of things. It -- it was a pretty
25 shocking list.

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1 Q Why was it shocking?

2 A I had not heard the majority of the
3 things on the list. And I -- I didn't know that --
4 I just -- I wasn't prepared for that was the kind of
5 meeting we were having.

6 Q And isn't it true that you heard things
7 that were prefaced with "no more this" or "no more
8 that"?

9 A I think so. Yes.

10 Q And did that surprise you also?

11 MS. HUDSON: Objection.

12 THE WITNESS: That specifically, I don't
13 remember focusing on. The -- the content, to me,
14 was more surprising.

15 BY MR. FREEDMAN:

16 Q And was anybody addressing Justin
17 directly?

18 A Yeah. I mean, it was to the room, but
19 yeah, I think it was mostly to Justin.

20 Q Was Ryan Reynolds yelling at Justin?

21 A It was a very long meeting. And there
22 were times, yes, his voice was raised.

23 Q Did you feel bad for Justin?

24 MS. HUDSON: Objection.

25 THE WITNESS: Yes.

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1 BY MR. FREEDMAN:

2 Q Why?

3 A I -- I think it went over five hours.
4 And he -- he was visibly frozen.

5 Q Who was invited to the meeting?

6 A Myself, Justin, Jamey, Alex Saks,
7 Todd Black, and I think it was the first AD or the
8 line -- I can't -- I can't remember.

9 Q Did Todd Black talk to you about his
10 reaction to the meeting?

11 A At length.

12 Q Did he tell you it was the -- one of the
13 harshest meetings he had ever been to in his entire
14 career?

15 A He did.

16 Q What did he say about that?

17 A It was -- it was the fact that we were
18 not prepared for such that -- that we thought
19 something else was going to occur and the length of
20 the meeting. And that there -- there was -- I -- I
21 don't even think there was a break. It just -- we
22 never experienced -- just never experienced that.

23 Q Had you ever experienced that in your
24 illustrious career?

25 MS. HUDSON: Objection.

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1 A No.

2 Q Was Sanford Panitch ever on set, as far
3 as you know?

4 A No.

5 Q Was Tom Rothman ever on set, as far as
6 you know?

7 A No.

8 Q Was Josh Greenstein ever on set, as far
9 as you know?

10 A No.

11 Q Do you know whether Ms. Lively ever
12 discussed any of the concerns that she had with the
13 behavior of Justin Baldoni and Jamey Heath with
14 Michael Marshall?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: I don't know, but I don't
17 think so.

18 BY MS. HUDSON:

19 Q Do you know whether Ms. Lively ever
20 discussed the concerns that she had with Jamey Heath
21 or Justin Baldoni with Sanford Panitch?

22 MR. FREEDMAN: Objection.

23 THE WITNESS: I don't know, but I don't
24 think so.

25

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1 THE WITNESS: In regards to nudity in
2 the -- in the nudity rider and daillies had nudity?

3 BY MS. HUDSON:

4 Q If her nudity rider had a provision that
5 required the daillies to be destroyed in certain
6 circumstances, would it be appropriate for the
7 daillies to have been destroyed consistent with the
8 circumstances laid out in the nudity rider?

9 A Yes.

10 Q Let's look at Exhibit 41.

11 This is a text message between
12 Ms. Giannetti and Ms. Lively, dated August 11th,
13 2024, Bates-stamped BL_8024.

14 Ms. Giannetti, I'm going to draw your
15 attention to your text to Blake Lively on
16 August 11th.

17 Can you read it out loud?

18 A Sure.

19 (As read):

20 "Blake, \$50 million!! Your blood,
21 sweat, tears, brilliant smarts, heart
22 and soul in every single frame. My
23 God, it's incredible. Thank you
24 50 million times. And it's only
25 Saturday night."

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1 Q What were you referring to here?

2 A The success of the opening of the film.

3 Q Was the opening of the film successful?

4 A Very.

5 Q And -- and how did it compare to other
6 movies of the genre?

7 MR. FREEDMAN: Objection.

8 THE WITNESS: It was gigantic.

9 BY MS. HUDSON:

10 Q Was it a historically successful movie?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: Oh, you could say that. I
13 think that's fair.

14 BY MS. HUDSON:

15 Q And how much money has It Ends with Us
16 made to date?

17 A I can't tell you to date. I can tell you
18 to date theatrically. I think it's close to
19 \$350 million.

20 Q And is that a historically large success
21 rate?

22 A For this size budget and this genre,
23 incredible.

24 Q And the cut of the film that went to
25 theaters was the one that Ms. Lively worked on for

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1 Sony, correct?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: Yes.

4 MS. HUDSON: Okay. No further questions.

5 MR. FREEDMAN: I just have a little bit.

6 I will ask them from here, if that's okay.

7 THE WITNESS: It's okay.

8 MR. FREEDMAN: Sorry about that.

9 THE WITNESS: That's all right.

10 MR. FREEDMAN: You're close, though.

11 THE WITNESS: I know. I can feel it.

12 EXAMINATION

13 BY MR. FREEDMAN:

14 Q Let me start by giving you a document I
15 will ask the court reporter to mark as Exhibit 42
16 for identification.

17 THE STENOGRAPHIC REPORTER: Here you go.
18 Exhibit 42 for the record.

19 (Exhibit 42 marked for identification.)

20 BY MR. FREEDMAN:

21 Q Exhibit 42 is an exchange between, it
22 looks like Josh Greenstein and yourself, and it's
23 dated September 3, 2024.

24 A Uh-huh.

25 Q Do you recognize the document?

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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 25th day of September, 2025.



ASHLEY SOEVYN

CSR No. 12019