

September 5, 2025

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Civ. Action No. 1:25-cv-779

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STEPHANIE JONES and JONESWORKS LLC,

Plaintiffs,

- against -

JENNIFER ABEL, MELISSA NATHAN,
JUSTIN BALDONI, WAYFARER STUDIOS LLC,
and JOHN DOES 1-10,

Defendants.

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JUSTIN BALDONI (Via Zoom)

JENNIFER ABEL (Via Zoom)

JAMEY HEATH (Via Zoom)

ZACH CZERENDA, Concierge Tech (Via Zoom)

COREY WAINAINA, Videographer

1 K. CASE - CONFIDENTIAL

2 THE VIDEOGRAPHER: Good morning
3 everyone. We are going on the record
4 at 9:10 a.m. on Friday, September 5th,
5 2025. Please note that the microphones
6 are sensitive and may pick up
7 whispering and private conversations.

8 This is media unit one of the
9 video-recorded deposition of Katherine
10 Case in the matter of Blake Lively
11 versus Wayfarer Studios LLC, et al.
12 This is filed in the United States
13 District Court, Southern District of
14 New York, the case number is
15 1:24-CV-10049-LJL.

16 My name is Corey Wainaina
17 representing Veritext Legal Solutions
18 and I am the videographer. The court
19 reporter is Todd DeSimone also from the
20 firm Veritext Legal Solutions. I am
21 not authorized to administer an oath, I
22 am not related to any party in this
23 action, nor am I financially interested
24 in the outcome.

25 Please be aware that all

1 K. CASE - CONFIDENTIAL
2 appearances and affiliations will be
3 noted on the stenographic record, and
4 will the court reporter please swear in
5 the witness.

6 * * *

7 K A T H E R I N E C A S E,
8 called as a witness, having been first duly
9 sworn, was examined and testified
10 as follows:

11 EXAMINATION BY MS. BENDER:

12 Q. Good morning, Ms. Case.

13 A. Good morning.

14 Q. Can you please state your full
15 name and address for the record.

16 A. Katherine Hastings Case, [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

18 Q. And have you ever been deposed
19 before?

20 A. No.

21 Q. And do you understand that you
22 are under oath during this deposition?

23 A. Yes.

24 Q. Okay. Do you understand that
25 your testimony today carries the same

1 K. CASE - CONFIDENTIAL

2 A. I'm not entirely sure.

3 Q. What other employees worked at
4 TAG when you joined?

5 A. Carolina was there, Breanna was
6 there, Rylie was there, and Alyx was there.

7 Q. That is --

8 A. And Melissa as well, so six I
9 suppose.

10 Q. Is that Carolina Hurley,
11 Breanna Koslow, Alyx Sealy, and Rylie Long?

12 A. That's correct.

13 Q. And were you more senior than
14 those individuals?

15 A. Carolina, Breanna and I would
16 have all been senior-level employees.

17 Q. Did you all have the same job
18 title?

19 A. At the time I don't believe so.

20 Q. What was your job title?

21 A. When I started I was a senior
22 director. After a few months I became a
23 vice president.

24 Q. And at the time what were
25 Breanna and Carolina's job titles?

1 K. CASE - CONFIDENTIAL

2 A. I believe vice president.

3 Q. Did your job title change again
4 during the time that you were at TAG?

5 A. No.

6 Q. And in August 2024, were you,
7 Breanna and Carolina all vice presidents at
8 TAG?

9 A. I believe so, yes.

10 Q. What was Melissa Nathan's
11 reputation in the industry at the time you
12 joined TAG?

13 A. Melissa is known to be a very
14 successful publicist.

15 Q. Did she have any reputation
16 with respect to crisis work?

17 A. She is quite renowned in the
18 area of crisis.

19 Q. What do you think makes her so
20 effective?

21 A. Melissa is incredibly
22 strategic, she is very calm in the face of
23 stress, and she is very good with client
24 management.

25 Q. Does Melissa have significant

1 K. CASE - CONFIDENTIAL

2 colleagues' belief at the time that due to
3 the conversation taking place majority on
4 social, they would benefit from it.

5 Oftentimes in today's landscape,
6 conversations that start in social make
7 their way into traditional media.

8 Q. Did TAG take into account the
9 fact that online conversations make their
10 way in traditional media when it formulated
11 digital and social strategies?

12 A. Yes.

13 Q. Which of the services that
14 we've discussed did TAG provide to Wayfarer
15 and Baldoni?

16 A. They would have been more of
17 what I refer to as a crisis-based project.
18 So we were brought in because it was -- it
19 is my understanding that there were
20 negative overtures being discussed with
21 different media outlets. This was in
22 advance of the New York premiere. And it
23 was important to ensure that the Wayfarer
24 parties were protected against negative
25 attacks.

1 K. CASE - CONFIDENTIAL

2 Q. When you say negative attacks,
3 what are you referring to?

4 A. It was my understanding at the
5 time that certain false statements had been
6 made to media in regards to the Wayfarer
7 parties.

8 Q. How did you reach that
9 understanding?

10 A. It was communicated to me that
11 certain stories were being placed with
12 outlets that would be potentially
13 detrimental due to the false nature of the
14 stories.

15 Q. Who communicated that to you?

16 A. Melissa.

17 Q. Anyone else?

18 A. It was a topic of discussion on
19 many phone calls.

20 Q. Phone calls with clients who
21 were part of the Wayfarer account?

22 A. That's correct.

23 Q. And who attended those phone
24 calls?

25 A. It would depend. The first

1 K. CASE - CONFIDENTIAL
2 conversation I had was with Jamey and Tera.
3 From there it depended on, you know, Jen
4 Abel would join, Melissa would be on,
5 sometimes she wasn't able to, sometimes
6 Justin would be on. It depended on who was
7 available.

8 Q. What false statements did you
9 understand had been made to the media?

10 A. I'm not sure specifically, but
11 it was my understanding at the time that
12 there were certain allegations made about
13 making Ms. Lively feel uncomfortable and a
14 separate story about Mr. Baldoni's faith.

15 Q. And at that time those had, in
16 your view, already been placed?

17 A. The conversations were ongoing
18 with media.

19 Q. Where did you reach -- how did
20 you reach your understanding that these
21 were false?

22 A. In many conversations had with
23 the Wayfarer parties.

24 Q. You based your understanding of
25 their truth or falsity as to these stories

1 K. CASE - CONFIDENTIAL

2 A. I had never been on a call with
3 a psychic before.

4 Q. Was it unusual to you?

5 A. In my workday, it was unusual
6 comparatively to most client calls.

7 Q. It was unusual to you, correct?

8 A. In the scope of most client
9 calls, yes.

10 Q. What about just generally, was
11 it unusual?

12 A. I don't --

13 Q. What was the psychic's name?

14 A. I don't remember.

15 Q. Was it a male?

16 A. It was.

17 Q. How would individuals at TAG
18 communicate with each other when working on
19 this account?

20 A. Primarily text.

21 Q. iMessage?

22 A. Yes.

23 Q. Signal?

24 A. Not really, no.

25 Q. Sometimes?

1 K. CASE - CONFIDENTIAL

2 A. At times.

3 Q. When would TAG individuals use
4 Signal in lieu of iMessage?

5 A. If we would -- if we would
6 speak with Jed, it was primarily over
7 Signal.

8 Q. And why was that?

9 A. I'm not sure.

10 Q. Was that at Jed's request?

11 A. No.

12 Q. Who suggested that you use
13 Signal?

14 A. It was just the form of
15 communication that was used.

16 Q. Do you recall the first time
17 you communicated with Jed on Signal?

18 A. Not by date specifically, no.

19 Q. Did he text you on Signal?

20 A. Not individually, but as it
21 related to communications.

22 Q. Did you have a Signal account
23 prior to working at TAG?

24 A. I believe so, yes.

25 Q. And did you communicate on it

1 K. CASE - CONFIDENTIAL

2 not doing press with other cast members of
3 the film?

4 A. And just in general, whenever
5 there are certain conversations happening
6 online and a client is going to do a full
7 slate of interviews, it can be helpful to
8 run through messaging, talking points,
9 things of that nature.

10 Q. And this references navigating
11 obstacles. Do you see that?

12 A. I do.

13 Q. And it references creative
14 differences. Do you see that?

15 A. I do.

16 Q. Were these intended to refer to
17 differences with Ms. Lively?

18 A. It was just useful language.
19 He was the director and actor on the film.
20 You know, directing any movie there is
21 going to be obstacles that a director is
22 faced with. Creative differences is a
23 pretty common phrase used in the
24 entertainment industry.

25 Q. And here was that referring to

1 K. CASE - CONFIDENTIAL

2 Ms. Lively?

3 A. It could just be referring to
4 his experience as a director navigating
5 working with a lot of personalities on set.

6 Q. Did you have Ms. Lively in mind
7 when you suggested this language?

8 A. Given the situation, we were
9 accounting for Ms. Lively.

10 Q. Do you see at 9:32 a.m.
11 Ms. Abel refers to statements made by
12 Mr. Baldoni in the junket and she says he
13 used the word "friction." Do you see that?

14 A. I do.

15 Q. That's referring to Mr. Baldoni
16 using the word "friction"?

17 A. I believe so. I wasn't with
18 him at that interview.

19 Q. And she says "I think it's
20 important to get ahead of it."

21 Do you see that?

22 A. I do.

23 Q. What did you understand that to
24 mean?

25 A. Given the intentional

1 K. CASE - CONFIDENTIAL

2 KCASE-000003856.

3 You can put that document
4 aside. You are being handed what has been
5 marked Case Exhibit 8.

6 (Case Exhibit 8 marked for
7 identification.)

8 MR. FREEDMAN: Did you mark
9 this as 7?

10 MS. BENDER: It was marked as
11 7, but we are going to discuss Case
12 Exhibit 8.

13 Q. Okay. This is Bates stamped
14 KCASE-000004949, a text ranging from August
15 5th to August 6th, 2024.

16 Ms. Case, do you recognize this
17 document?

18 A. I do.

19 Q. What is it?

20 A. It seems to be a text thread
21 between myself and Melissa.

22 Q. Do you have any reason to think
23 this document is not as it was when it was
24 created?

25 A. No.

1 K. CASE - CONFIDENTIAL

2 Q. If you turn a few pages to
3 where the Bates stamp ends in 53. At 1:58
4 Melissa says to you "I have to drive to
5 this fucking meeting. Do you think you'll
6 have that copy for Jed today?"

7 Do you see that?

8 A. I do.

9 Q. Is that referring to Jed
10 Wallace?

11 A. Yes.

12 Q. What copy were you drafting for
13 Jed Wallace?

14 A. I believe this is in regards to
15 a client.

16 Q. Which client?

17 MR. BREED: W█ will designate
18 it as attorneys' eyes only, please.

19 THE VIDEOGRAPHER: Okay.

20 Q. Which client?

21 A. I believe this was for █
22 █

23 Q. Okay. On the next page, at
24 4:46 p.m., Melissa says "Jed and Bryan
25 asking me for copy lol kill me."

1 K. CASE - CONFIDENTIAL

2 Do you see that?

3 A. I do.

4 Q. Who is Bryan?

5 A. I believe Bryan Freedman.

6 Q. Bryan and Jed were working in
7 collaboration with TAG on the [REDACTED] [REDACTED]
8 account?

9 A. I didn't work on that account,
10 so I'm not sure.

11 Q. You worked on the copy that
12 Melissa was requesting for that account,
13 correct?

14 A. This was a one-off request.

15 Q. So you did some work on that
16 account, correct?

17 A. Specifically I assisted with
18 this copy.

19 Q. And you knew that Jed and Bryan
20 were working together asking for the copy
21 that you were preparing for that account,
22 correct?

23 MR. BREED: Objection.

24 MR. FREEDMAN: Objection.

25 A. Melissa alerted me at that

1 K. CASE - CONFIDENTIAL

2 time.

3 Q. You knew that both Jed and
4 Bryan were to receive the copy, correct?

5 MR. BREED: Objection.

6 MS. EMERY: Objection.

7 A. I knew that Melissa needed the
8 copy.

9 Q. For whom?

10 A. In her text message she said
11 Jed and Bryan were looking for it.

12 Q. Did Mr. Freedman work with TAG
13 and Jed on the Wayfarer account?

14 A. Not during the summer of 2024.

15 Q. When is your understanding that
16 Mr. Freedman started that work?

17 A. It is my understanding that it
18 was following Blake's CRD complaint, Civil
19 Rights Department complaint in December.

20 Q. When TAG was looking to
21 identify a subcontractor for digital
22 services in connection with the Wayfarer
23 account, did TAG receive multiple quotes
24 for those services?

25 A. That was communicated to me by

1 K. CASE - CONFIDENTIAL

2 Melissa at the time.

3 Q. And do you know whether TAG
4 received multiple quotes?

5 A. Melissa told me that there were
6 two quotes.

7 Q. Do you know what the quotes
8 were?

9 A. Offhand, I can't remember the
10 specific amount, but my assumption is one
11 was from Roza and one was from Jed, but I
12 can't confirm that.

13 Q. What is Street Relations?

14 A. It's my understanding that
15 that's Jed's company.

16 Q. And did you and TAG regularly
17 work with Street Relations?

18 A. When appropriate, if a client
19 required social or digital mediation, or
20 remediation, rather, we would work with Jed
21 as one of the contractors.

22 Q. And in this case, specifically
23 with respect to the Wayfarer account?

24 A. We did work with Jed.

25 Q. Who else did TAG work with at

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

10 Q. Have you ever met Mr. Wallace
11 in person?

12 A. No.

13 Q. And you testified earlier that
14 you had communicated directly with
15 Mr. Wallace, correct?

16 MS. EMERY: Objection.

17 A. Across several instances, yes.

18 Q. What were your modes of
19 communication with Mr. Wallace?

20 A. Primarily Signal.

21 Q. What other avenues of
22 communication?

23 A. Limited e-mail.

24 Q. Any others?

25 A. No.

1 K. CASE - CONFIDENTIAL

2 Q. And did you communicate with
3 Mr. Vituscka about Ms. Lively at all?

4 A. Yes.

5 Q. What about?

6 A. I was connected with him via
7 Melissa Nathan. I was told he was writing
8 a piece for the Daily Mail about how her
9 promotion matched that of Taylor Swift's
10 during her Eras tour.

11 Q. And did you provide him content
12 in connection with his writing that
13 article?

14 A. I provided links that were
15 readily available online.

16 Q. And did you read the ultimate
17 article when it came out?

18 A. I did.

19 Q. And was that article entitled
20 "How Blake Lively copied best friend Taylor
21 Swift to promote It Ends With Us before
22 turning to singer to help crisis manage
23 backlash and Justin Baldoni drama"?

24 A. If that was the story that had
25 James' name on it, then I assume that is

1 K. CASE - CONFIDENTIAL

2 A. Again, I'm not entirely sure if
3 this is the same timeline, but to my
4 recollection, nothing would have caused me
5 to feel anything was a misrepresentation.

6 Q. Ms. Case, who is paying your
7 legal expenses?

8 MR. BREED: Objection.

9 A. I'm not entirely sure.

10 Q. You don't know?

11 A. No.

12 Q. Who do you think is paying your
13 legal expenses?

14 MR. BREED: Objection.

15 A. I'm not sure.

16 Q. Are you paying them?

17 A. I personally am not.

18 Q. Are the Wayfarer parties?

19 MR. BREED: Objection.

20 A. I'm not sure.

21 Q. Have you had a conversation
22 with anyone regarding who is paying your
23 legal expenses?

24 MR. BREED: Objection.

25 A. I was given indemnification

1 K. CASE - CONFIDENTIAL

2 based on these things happening during my
3 employment at TAG.

4 Q. Indemnification by TAG?

5 A. It's my -- it's my
6 understanding, but, again, I'm not entirely
7 sure.

8 Q. You are being provided a
9 document that is being marked Case Exhibit
10 26.

11 (Case Exhibit 26 marked for
12 identification.)

13 Q. Bates stamped KCASE-000003477.
14 Do you recognize this document?

15 A. Yes.

16 Q. What is it?

17 A. A text thread between Breanna
18 and myself.

19 Q. Any reason to believe that this
20 document has been altered since when it was
21 originally made?

22 A. I don't believe so.

23 Q. If you flip two pages to the
24 document numbered 3479, at 10:56 a.m. do
25 you see that you sent a screen shot to

1 K. CASE - CONFIDENTIAL

2 Q. How is your relationship with
3 Melissa now?

4 A. I have a great deal of respect
5 for Melissa. She has been my mentor for
6 almost a decade.

7 Q. How is your relationship?

8 A. Conversations have been
9 limited, but, again, I hold nothing but
10 respect for Melissa.

11 Q. Has your relationship been
12 strained by this whole case?

13 A. I don't believe so, no.

14 Q. Has Melissa indicated that
15 that's the case?

16 A. No.

17 Q. Did you leave TAG because you
18 were unhappy at TAG?

19 A. No.

20 Q. Why did you leave TAG?

21 A. I was offered a more fortuitous
22 opportunity.

23 Q. When was that?

24 A. That would have been late
25 December/early January.

1 K. CASE - CONFIDENTIAL

2 prep that they had spoken to anyone
3 representing the Wayfarer parties prior to
4 your preparation?

5 A. I can't say.

6 Q. Ms. Case, are you aware of
7 various websites and social media accounts
8 that are disparaging of Ms. Jones?

9 MR. BREED: Objection.

10 A. I am aware of websites about
11 Ms. Jones.

12 Q. Did you create any of the
13 websites that are disparaging of Ms. Jones?

14 A. No.

15 Q. Who did?

16 A. I don't know.

17 Q. How did you become aware of the
18 websites that are disparaging of Ms. Jones?

19 MR. BREED: Objection.

20 MR. FREEDMAN: Objection.

21 Q. How did you become aware of the
22 websites disparaging Ms. Jones?

23 A. I received a call from Melissa
24 in early May. It was communicated to me
25 that a website had been requested.

1 K. CASE - CONFIDENTIAL

2 Q. A website had been requested?

3 A. The creation of a website had
4 been requested.

5 Q. By whom?

6 MR. FREEDMAN: Objection.

7 MR. BREED: Let's designate
8 this AEO, please.

9 MS. TAHLER: We can go off.

10 THE VIDEOGRAPHER: Yeah.

11 A. Melissa represented to me that
12 a potential new client had requested the
13 formulation of a website.

14 Q. Who was that new client?

15 MR. FREEDMAN: Objection.

16 A. At the time it was represented
17 to me that it was [REDACTED] [REDACTED].

18 Q. Melissa Nathan told you that
19 [REDACTED] [REDACTED] had requested preparation of a
20 website about Ms. Jones?

21 MR. FREEDMAN: Objection.

22 A. She represented to me that he
23 had requested the creation of a website of
24 this nature.

25 Q. Did she tell you anything else

1 K. CASE - CONFIDENTIAL

2 about what [REDACTED] [REDACTED] had requested?

3 A. Not what he had requested
4 specifically.

5 Q. Generally what he had
6 requested?

7 A. Not necessarily what he had
8 requested, but specific language was
9 communicated.

10 Q. What was that specific
11 language?

12 A. That Stephanie holds clients
13 hostage, that she leaks clients' secrets,
14 and that she treats her employees poorly,
15 amongst others.

16 Q. Ms. Nathan told you that
17 [REDACTED] [REDACTED] had said the things that you
18 just said to her?

19 A. No.

20 Q. Who did Ms. Nathan say said
21 that Stephanie holds clients hostage?

22 MR. BREED: Objection.

23 A. I don't know who might have
24 said that. This language was communicated
25 to me.

1 K. CASE - CONFIDENTIAL

2 Q. By Ms. Nathan?

3 A. The conversation was with her,
4 yes.

5 Q. It was a conversation?

6 A. Yes.

7 Q. Did Ms. Nathan send you any
8 written communications about this?

9 A. Not about the language to be
10 used, no.

11 Q. Generally about the websites?

12 A. At that time, no.

13 Q. At any time?

14 A. There was conversation about
15 the copy that I had written based on the
16 information provided, I redrafted and sent
17 back to her.

18 Q. Did you draft the copy for the
19 website about Ms. Jones?

20 A. Based on the conversation and
21 the language provided to me, I provided
22 copy.

23 Q. So yes, you provided -- you
24 wrote the copy that was -- that became the
25 website of Ms. Jones?

1 K. CASE - CONFIDENTIAL

2 MR. FREEDMAN: Objection.

3 A. Based on the language that I
4 was instructed to use.

5 Q. Did anyone else provide you
6 with that language besides Ms. Nathan?

7 MR. BREED: Objection.

8 A. No.

9 Q. And Ms. Nathan provided all of
10 this language to you orally?

11 MR. FREEDMAN: Objection.

12 MR. BREED: Objection.

13 A. She provided language to
14 reference over the phone, yes.

15 Q. Did she put anything in writing
16 about the language to be used in the
17 website?

18 A. No.

19 Q. What happened -- did she send
20 an audio message?

21 MR. BREED: Objection.

22 A. No.

23 Q. What happened after you
24 provided Ms. Nathan with the copy?

25 A. I don't know.

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2 Q. Did you come to understand that
3 the copy that you had drafted became a
4 website about Ms. Jones?

5 A. I was made aware of that, yes.

6 Q. Who made you aware of that?

7 A. Melissa.

8 Q. And what did Melissa tell you?

9 A. She sent me the link.

10 Q. The link to which website?

11 A. It might have been the leaks.
12 I don't remember which came first.

13 Q. She sent it to you how?

14 A. In a text message.

15 Q. And that text message sending
16 Stephanie Jones Leaks you recognized as the
17 copy that you had drafted, correct?

18 A. That's correct.

19 Q. Did [REDACTED] pay TAG to
20 create this website?

21 MR. BREED: Objection.

22 A. I don't know.

23 Q. Did [REDACTED] become a client
24 of TAG?

25 A. He did not.

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2 Q. Do you know if Ms. Nathan had
3 any other conversations with [REDACTED]
4 other than the one you have already
5 discussed?

6 MR. BREED: Objection.

7 MR. FREEDMAN: Objection.

8 A. I don't know.

9 Q. Did Ms. Nathan report to you
10 any other conversations with [REDACTED]
11 other than the one you have already
12 discussed?

13 MR. FREEDMAN: Objection.

14 MR. BREED: Objection.

15 A. No.

16 Q. Do you recall anything else
17 about that initial conversation with
18 [REDACTED] other than what you have
19 already testified to?

20 MR. BREED: Objection. That
21 wasn't the testimony.

22 A. It wasn't a conversation with
23 [REDACTED].

24 Q. What was it with [REDACTED]

25 A. I never spoke to [REDACTED]

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2 Q. I had understood that
3 Ms. Nathan had spoken with [REDACTED] [REDACTED] and
4 then Ms. Nathan reported that to you.

5 MR. BREED: Objection, that
6 wasn't the testimony either.

7 MR. FREEDMAN: Objection.

8 MS. TAHLER: I'm asking for
9 clarification.

10 A. I am not aware of whether or
11 not Melissa spoke with [REDACTED] [REDACTED] It was
12 communicated to me that the site was at
13 either his or someone affiliated with him's
14 request.

15 Q. Did she tell you if she ever
16 spoke to him directly?

17 A. No.

18 Q. Did she tell you who she spoke
19 to about this?

20 A. No.

21 (Case Exhibit 35 marked for
22 identification.)

23 Q. Ms. Case, you are now reviewing
24 a document that has been marked as Case 35.
25 It is a printout of the website

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2 StephanieJonesLeaks.com.

3 Do you recognize this as the
4 copy that you drafted?

5 A. I believe so, yes.

6 Q. Do you know how this went from
7 the copy that you drafted to becoming a
8 website?

9 A. I do not.

10 Q. Did Melissa communicate
11 anything to you about how this became a
12 website after you provided her with the
13 copy?

14 MR. FREEDMAN: Objection.

15 A. No.

16 Q. Do you understand there came a
17 time where this website was shut down?

18 MR. BREED: Objection.

19 A. No.

20 Q. Did you understand that there
21 came a time where there was a second
22 website?

23 A. At the time I wasn't aware that
24 there was a second website, no.

25 Q. After you provided Ms. Nathan

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2 with the copy for Exhibit 35, did you have
3 any other discussions with Ms. Nathan about
4 websites regarding Ms. Jones?

5 MR. FREEDMAN: Objection.

6 A. Websites, plural, no. I was
7 asked to help alongside her to draft a
8 handful of tweets for the Twitter page, and
9 I was asked, again, based on language that
10 I was provided to extrapolate that into
11 updates to the website.

12 Q. You referred to the Twitter
13 page. What is the Twitter page?

14 A. I don't recall the specific
15 handle. I was told that at the time the
16 site went public there was a corresponding
17 Twitter page.

18 Q. Was that Twitter handle
19 @LyingStephJones?

20 MR. FREEDMAN: Objection.

21 A. I'm not sure. I don't recall
22 what the Twitter page was.

23 Q. Melissa told you that there was
24 a corresponding Twitter handle?

25 A. She asked if I could assist in

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2 drafting tweets, so I inferred that the
3 Twitter handle was related.

4 Q. Did she tell you that the
5 tweets that you had drafted had in fact
6 been posted?

7 A. She did not communicate that,
8 no.

9 Q. Did you form an understanding
10 that they had been posted?

11 MR. FREEDMAN: Objection.

12 A. Yes.

13 Q. Based on what?

14 A. Seeing them on the Twitter
15 page.

16 Q. How many tweets did you prepare
17 for the Twitter page?

18 A. Roughly five or six.

19 Q. How did you provide those to
20 Ms. Nathan?

21 A. I believe maybe Signal. I
22 don't really recall.

23 Q. Do you recall communicating
24 with Ms. Nathan on Signal regarding
25 Ms. Jones?

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2 A. In relation to the tweet
3 drafts, yes.

4 Q. Do you still have those Signal
5 messages today?

6 A. No.

7 Q. Why did you communicate with
8 her on Signal?

9 A. I don't know.

10 Q. Did you frequently communicate
11 with Ms. Nathan on Signal?

12 A. No.

13 Q. You communicated with
14 Ms. Nathan to make sure that the messages
15 would disappear, correct?

16 MR. BREED: Objection.

17 MR. FREEDMAN: Objection.

18 A. No.

19 Q. Was there any other reason to
20 communicate on Signal?

21 A. To my knowledge, no.

22 (Case Exhibit 36 marked for
23 identification.)

24 Q. You are reviewing what has been
25 marked as Exhibit 36. It is a Twitter

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2 account.

3 Does this refresh your
4 recollection that this is the Twitter
5 account that you reviewed where your tweets
6 were posted?

7 A. To my recollection, I was only
8 aware of one of them. I believe it was Not
9 a Stephanie Fan.

10 Q. You are aware of the Twitter
11 account Not a Stephanie Fan?

12 A. To my recollection, that looks
13 like the one that I was aware of.

14 Q. Your tweets were posted to Not
15 a Stephanie Fan?

16 A. I don't know.

17 Q. But you weren't aware of any of
18 the other Twitter accounts in Exhibit 36?

19 A. No.

20 MR. BREED: Objection.

21 Q. Did Melissa create Not a
22 Stephanie Fan?

23 A. I don't know.

24 Q. Did she explain to you that a
25 Twitter account was being created?

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2 A. There was never a formal
3 explanation. I was simply asked to draft
4 tweets.

5 Q. Do you know whether Melissa had
6 any other assistance in this?

7 A. I don't know.

8 Q. Do you know whether she worked
9 with Jed Wallace on this?

10 MR. FREEDMAN: Objection.

11 A. I spoke with Jed in conjunction
12 to Melissa as it related to the tweets.

13 Q. And what did you and Jed
14 discuss?

15 MR. FREEDMAN: Objection.

16 MS. EMERY: Objection.

17 A. The tweets.

18 Q. What about the tweets?

19 A. I provided them via Signal.

20 Q. Was it your understanding that
21 Jed was going to post the tweets?

22 MR. FREEDMAN: Objection.

23 MR. BREED: Objection.

24 MS. EMERY: Objection.

25 A. I don't know.

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2 Q. Did you speak with him other
3 than over Signal?

4 MR. FREEDMAN: Objection.

5 MS. EMERY: Objection.

6 A. No.

7 Q. Did you speak with him other
8 than with regard to sending him these
9 tweets?

10 MR. BREED: Objection.

11 MR. FREEDMAN: Objection.

12 MS. EMERY: Objection.

13 A. I don't recall.

14 Q. Did you speak to him at all in
15 connection with the first website?

16 MR. FREEDMAN: Objection.

17 MS. EMERY: Objection.

18 A. I don't recall.

19 Q. Were all of your communications
20 with Jed Wallace regarding Stephanie Jones
21 done via Signal?

22 MR. FREEDMAN: Objection.

23 A. Yes.

24 Q. Did Jed Wallace communicate to
25 you that he would like communications to be

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2 done over Signal?

3 MR. BREED: Objection.

4 MS. EMERY: Objection.

5 A. No.

6 Q. How did you understand that you
7 were to communicate over Signal?

8 A. It's where the thread was.

9 Q. Was the thread among you, Jed,
10 and Melissa?

11 MR. FREEDMAN: Objection.

12 A. Yes.

13 Q. Was anyone else on this thread?

14 A. No.

15 Q. Was that your only thread with
16 Jed?

17 A. I don't recall, no.

18 Q. Did you have any other threads
19 related to this topic -- strike that.

20 Did you have any other Signal
21 threads related to this topic of the
22 Twitter accounts or the websites generally
23 with Melissa Nathan and anyone else?

24 MR. FREEDMAN: Objection.

25 MS. EMERY: Objection.

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2 Q. After Ms. Abel brought you on
3 to work with Wayfarer, correct?

4 A. Yes.

5 Q. Ms. Jones was not involved in
6 Wayfarer hiring TAG, correct?

7 A. I'm not sure.

8 Q. To your knowledge, did
9 Ms. Jones have any knowledge, or, I'm
10 sorry, any involvement?

11 A. I don't know.

12 Q. Did you ever talk to Ms. Jones
13 regarding Wayfarer?

14 A. I did not.

15 Q. When did Melissa Nathan tell
16 you that Ms. Abel was leaving Jonesworks?

17 A. I don't recall specifically. I
18 know it was around the time of her first
19 conversation with Justin.

20 Q. Around Ms. Nathan's first
21 conversation with Justin?

22 A. Yes.

23 Q. Do you recall approximately
24 when that was?

25 A. Late July.

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2 not exactly sure what she did; is that
3 correct?

4 A. That's correct.

5 Q. Do you have any ill will of
6 Melissa Nathan?

7 A. No.

8 Q. Earlier you testified that the
9 Alexander brothers were turned down by TAG
10 as clients?

11 A. That's my understanding.

12 Q. Isn't it true that you yourself
13 personally worked for them on the side?

14 A. I wouldn't qualify it as
15 working with them.

16 Q. Are you saying you didn't
17 perform any services whatsoever for the
18 Alexander brothers?

19 A. It was requested that I connect
20 with them to create a website in
21 conjunction with their ongoing litigation.

22 Q. And that was not for TAG, it
23 was outside of TAG, right?

24 A. I'm not sure.

25 Q. Well, Melissa Nathan turned

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2 down the Alexander brothers, she didn't
3 want them as clients; isn't that correct?

4 A. She didn't want them as clients
5 for TAG, but I did connect with Melissa and
6 Jed as it related to the website.

7 Q. As it related to the Alexander
8 website, were you paid for that?

9 A. I received payment for work
10 done in conjunction with Jed and Melissa.

11 Q. You are saying that Jed and
12 Melissa did work for the Alexander
13 brothers?

14 A. I'm saying they asked me to
15 perform work for the Alexander brothers.

16 Q. And the Alexander brothers,
17 when did you do that work?

18 A. I don't recall off the top of
19 my head. I believe in October.

20 Q. And that was after TAG had
21 turned them down as clients, correct?

22 A. That's my understanding.

23 Q. Did you do any other work on
24 the side?

25 MS. TAHLER: Objection.

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CERTIFICATION

I, TODD DeSIMONE, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose testimony as herein set forth, was duly sworn by me; and that the within transcript is a true record of the testimony given by said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of September, 2025.



TODD DESIMONE