

**September 29, 2025**

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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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

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

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

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VIDEO-RECORDED DEPOSITION OF MELISSA NATHAN  
Los Angeles, California  
Monday, September 29, 2025

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

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1 me strike that and try to be clear.

2 When you said you understood that you  
3 were required to preserve everything related to this  
4 matter, Ms. Lively had allegations other than sexual  
5 harassment allegations, correct?

6 A Whatever was in here, I knew I was meant  
7 to preserve it, and I did that.

8 Q Okay. And you knew that those  
9 preservation requirements extended to text messages  
10 and social media accounts and emails, right?

11 A From the 20th of December, I knew that,  
12 yes.

13 Q And including messages sent through  
14 WhatsApp or Signal or other ephemeral messaging  
15 platforms?

16 A I did.

17 Q Okay. And did you preserve all of your  
18 messages after this point in time?

19 A I did.

20 Q You -- you have a messaging app on your  
21 phone. Do you have any auto delete functions  
22 enabled, so far as you know, on your text messages  
23 on your phone? Your regular messaging app, not  
24 Signal or WhatsApp or any other?

25 A During what time period? In general? Or

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1 my text?

2 Q In general.

3 A No.

4 Q And did you at any point during the time  
5 period of July 1st, 2024 to the present, ever have  
6 an auto delete function enabled on your regular  
7 messaging app on your phone?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: No.

10 BY MR. GOTTLIEB:

11 Q You sometimes use Signal; is that right?

12 A I do.

13 Q And you were using Signal, at least for  
14 some purposes, in July and August of 2024; is that  
15 right?

16 A It is.

17 Q And Signal is not like the standard Apple  
18 messaging product; is that right?

19 A I can't speak to the Apple messaging  
20 product, but I know what Signal is used for.

21 Q And what is it used for?

22 A It's used to -- it's been really popular  
23 especially in all of our live business over the last  
24 couple of years because there is an option that you  
25 can -- it auto deletes messages for private

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1 communications to deal with all clients.

2 Q Okay. That's been popular in your line  
3 of work over the last couple of years?

4 A It is.

5 Q Do you use it for many clients that you  
6 work for?

7 A Not all, but I used -- it's become  
8 popular over the last couple of years, yes.

9 Q Okay. Not all but --

10 A Not all.

11 Q -- but a significant number?

12 A I would -- yeah. And it's becoming more  
13 so, yes.

14 Q Okay. And you used Signal for  
15 communications relating to the Wayfarer parties; is  
16 that right?

17 A At what point?

18 Q Well, when was the first time that you  
19 can remember sending or receiving a Signal message  
20 that concerned Justin Baldoni, the Wayfarer parties,  
21 Blake Lively, any of the things connected to this  
22 case?

23 A I can't remember that.

24 Q Was it in August of 2024?

25 A I don't know.

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1 Q You don't know, as you sit here today,  
2 whether you sent or received a single message on  
3 Signal in August of 2024 relating to this -- this  
4 matter?

5 A I don't know.

6 Q You used Signal when you communicate with  
7 Jed Wallace; is that right?

8 A Amongst other things, yes.

9 Q What other things?

10 A Telephone.

11 Q What else?

12 A Text.

13 Q What else?

14 A Email.

15 Q What else?

16 A To the best of my knowledge, that's it.

17 Q Voice memos?

18 A I don't send voice memos.

19 Q Have you received voice memos from  
20 Mr. Wallace?

21 A Yes.

22 Q Do any of those voice memos have an auto  
23 delete function attached to them?

24 A I'm not sure.

25 Q Do you have any understanding of what the

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1 auto deleted function was set to on your Signal  
2 threads, what your, sort of, standard is that you  
3 use?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: On which particular thread?  
6 You have to be more specific.

7 BY MR. GOTTLIEB:

8 Q Well, you don't have a recollection of  
9 when you started using Signal for the Wayfarer  
10 parties, right?

11 A No.

12 Q I'm trying to just ask you generally  
13 because you don't have that recollection --

14 A Uh-huh.

15 Q -- if you know -- generally speaking, if  
16 you have a typical period of time that you use for  
17 your client work when you're using a Signal thread?

18 A I do not know.

19 Q How about with Mr. Freedman; you are on  
20 Signal threads with him?

21 A I am.

22 Q And what is the typical deletion time  
23 that you have set for your communications with him?

24 A I'm not sure.

25 Q Is it more than a week?

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1 A I'm not sure.

2 Q Do you have a guess?

3 A I don't have a guess.

4 Q But there is a deletion function set,  
5 right?

6 A Well, it depends on which conversation  
7 you're speaking about.

8 Q Okay. Do you use any other messaging  
9 apps other than Signal and text and email?

10 A I do have WhatsApp on my phone, but I  
11 barely use it.

12 Q Did you ever use WhatsApp for anything  
13 connected to the issues in this case?

14 A Not to my knowledge.

15 Q Okay. Any other messaging apps?

16 A On this case?

17 Q Uh-huh.

18 A No.

19 Q Do you ever use Telegram?

20 A For this case?

21 Q For this case.

22 A Not to my knowledge. And if there is  
23 something there, please let me know because I don't  
24 really use it.

25 Q What about Proton Mail? Do you ever use

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1 minutes.

2 MR. GOTTLIEB: All right. Why don't we  
3 take a quick break because I need to use the  
4 facilities.

5 THE WITNESS: Sure.

6 THE VIDEOGRAPHER: The time is 10:29 a.m.  
7 Off record.

8 (Recess.)

9 THE VIDEOGRAPHER: The time is 10:46 a.m.  
10 We're back on record.

11 BY MR. GOTTLIEB:

12 Q All right. Thank you, Ms. Nathan. Back  
13 on the record. What is your position at TAG?

14 A I'm the founder and CEO.

15 Q Founder and CEO. And so you oversee all  
16 your employees?

17 A I do.

18 Q Is there anyone you answer to at TAG?

19 A No.

20 Q How many employees did TAG have, let's  
21 focus, just for the time being, on July and August  
22 of 2024?

23 A Yes.

24 Q How many people worked for you at TAG  
25 during that period of time?

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1 A I can't remember.

2 Q Do you have a recollection of who was on  
3 the first call that you had with Wayfarer?

4 A I think it was just Jamey and Jen. I  
5 think.

6 Q So just Mr. Heath and Ms. Abel?

7 A Yes.

8 Q And you don't have a recollection of  
9 Ms. Hanks being a part of that discussion?

10 A No.

11 Q Okay.

12 MR. GOTTLIEB: Let's look at  
13 Ms. Nathan, I'm handing you what's been marked as  
14 Exhibit 4. This is a document bearing the Bates  
15 numbers Nathan 3795 through Nathan 3798.

16 (Exhibit 4 marked for identification.)

17 BY MR. GOTTLIEB:

18 Q This appears to be an email from Katie  
19 Case to you and some other people on Friday,  
20 July 26th, 2024, with some emails below it?

21 A Yes.

22 Q Do you recognize this document?

23 A I do.

24 Q What is it?

25 A This is an email sent by Katie to the

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1 Wayfarer team thanking for the call and attaching  
2 the scope of work.

3 Q Okay. And if we work backwards from the  
4 bottom of page 3795, the first page of this  
5 document

6 A Uh-huh.

7 Q -- you see a series of emails here. The  
8 first one is Thursday, July 25th, 2024 at  
9 9:25 p.m.

10 Do you see that?

11 A I do.

12 Q And that's from Mr. Heath to Katie Case,  
13 Tera Hanks. And then I see your email, and is that  
14 Ms. Koslow's email?

15 A At the top, yes.

16 Q Okay. So Mr. Heath has sent a message to  
17 you, Ms. Hanks, Ms. Case, and Ms. Koslow that simply  
18 just says:

19 (As read):

20 "Thank you Katie."

21 At 9:25 p.m. on the 25th of July; is  
22 that right?

23 A That is correct.

24 Q And Ms. Hanks replies, also on the 25th  
25 of July, looks like around 6:30 p.m.:

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1 (As read) :

2 "I would love to jump on a Zoom now, if  
3 possible. If that works, can you  
4 please provide a link?"

5 Do you see that?

6 A Yes. I do.

7 Q And then you respond at 12:42 a.m. on  
8 Friday July 26th, saying:

9 (As read) :

10 "Thank you so much for taking the time  
11 to speak with us. Jen and our team  
12 will connect tomorrow and go through  
13 everything. We will aim to have a plan  
14 to you by the end of tomorrow."

15 Do you see that?

16 A I do see that.

17 Q Okay. So does that mean that you had a  
18 conversation with Mr. Heath and Ms. Hanks at some  
19 point here in between the evening of July 25th and  
20 early-early in the morning of the 26th?

21 A I don't know if we spoke early in the  
22 morning of the 26th because that was -- it says  
23 "Thank you so much for the time last evening," but  
24 that would mean the night before. Yes.

25 Q All I'm -- okay. Fair enough. So

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1 we'll -- we'll stipulate to evening of the 25th.

2 A Yes.

3 Q You've got -- you have a meeting.

4 And then you see the top of the email is  
5 Ms. Case responding, sending to you and that same  
6 group with a scope of work.

7 Do you see that?

8 A Yes.

9 Q Is that is that the document that is  
10 attached here with the pages 3797 and 3798 on it?

11 A If this is what's been provided to you on  
12 that exact -- from our emails that you have, then  
13 yes.

14 Q Okay. And you see that the -- on the  
15 first page if you go back, it says "Attachments:  
16 Wayfarer Studios TAG PR Scope of Work July 26th,  
17 2024"?

18 A I do see that.

19 Q Okay. And then do you see the header at  
20 the top of the attachment that says "Scope of Work  
21 July 26, 2024"?

22 A Yes.

23 Q Okay. Does this look like the document  
24 you sent over to Wayfarer Studios on that day?

25 A I'm going to trust my lawyers and say to

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1 Q Okay. Do you see in the overview, how  
2 the document says:

3 (As read) :

4 "There are several potential scenarios  
5 at play here, which we should be  
6 prepared for should BL and her team  
7 make her grievances public"?

8 A Yes.

9 Q "BL and her team" refers to Blake Lively  
10 and her team?

11 A Yes.

12 Q Who did you understand Ms. Lively's team  
13 to be at this time?

14 A Leslie Sloane and her publicists.

15 Q Okay. Who else besides Leslie Sloane did  
16 you understand to be part of Ms. Lively's team?

17 A I didn't know anyone else.

18 Q Okay. Do you see the next sentence says:

19 (As read) :

20 "Given she was made to compromise with  
21 the premiere, we feel she will move  
22 forward with doing so."

23 Do you see that?

24 A Yes.

25 Q It was the -- it was TAG's view that you

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1 all believed that Ms. Lively and her team would make  
2 her grievances public?

3 A Again, this is scenario planning. So  
4 this is a possibility. This is not definitive.

5 Q Right. I mean, the scenarios -- I'm  
6 not -- I didn't really ask you if you thought it was  
7 definitive that she would do so. I'm just saying  
8 what you're describing here in this first paragraph  
9 is, there are scenarios that we need to be prepared  
10 for should she make her grievances public --

11 A Absolutely.

12 Q -- and then we believe, given that she  
13 was made to compromise with the premiere, that she  
14 will move forward with doing so.

15 Do you see that?

16 A Yes.

17 Q So all I'm asking you is, it was your  
18 view, or TAG's view at least at the time, that  
19 Ms. Lively was going to make her grievances public;  
20 is that right?

21 A No, she could. You keep on saying that  
22 it's my view. This is like she could have made.  
23 Yes.

24 Q (As read) :

25 "We feel she will move forward with

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1 is "our team's digital experts"?

2 A In this scenario? Because we have a few.

3 Q In this -- who are you referring to in  
4 this document sent to your client?

5 A Wayfarer hired Jed Wallace.

6 Q Okay. And is that who you had in mind  
7 when this was written to -- to the client?

8 A That would be fair, yes.

9 Q Okay. And if you recall previously, we  
10 were looking at the TAG website.

11 A Yes.

12 Q And there is a reference there to digital  
13 and social strategy?

14 A Yeah.

15 Q Is that -- when you're talking about  
16 digital and social strategy, is Mr. Wallace one of  
17 the people that you have in mind as the people  
18 providing those services for TAG?

19 A Yes.

20 Q Is there anybody else that TAG uses for  
21 digital or social strategy?

22 A There is.

23 Q Who is that?

24 A Skyline.

25 Q Okay. And who is in charge of Skyline?

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1 A Two people.

2 Q Who is that?

3 A Roza and her partner, and I forget his  
4 last name. But yeah, Roza.

5 Q What is Roza's full name?

6 A Kalantari.

7 Q Can you spell that, please?

8 A K-A-L -- K-A-L-A-N-T-A-R-I.

9 Q Okay. Did Ms. Kalantari provide any work  
10 in the -- on this -- on the Wayfarer account in  
11 connection with TAG?

12 A At what time?

13 Q At any time.

14 A After litigation, yes.

15 Q Okay. So in the July-August period of  
16 time, Ms. Kalantari did not perform any services for  
17 TAG?

18 A She did not.

19 Q In fact, at one point in time, did Ms.  
20 Kalantari tell you that she would not be available  
21 to work on this account in around July, August 2024?

22 A I can't remember that.

23 Q Okay. Did Skyline perform any work in  
24 connection with your work in July or August of 2024?

25 A Define my work.

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1 Q How is that different from off the  
2 record? How is it different to -- is there a  
3 difference between talking on background as a source  
4 familiar and talking to a journalist off the record?

5 A It's a gray line, but yes.

6 Q Okay. So explain that to me.

7 A Off the record is telling someone a piece  
8 of information that you would like it to be off the  
9 record. I think it's, you know, important to note  
10 that just because we tell a reporter something,  
11 doesn't mean they're going to write it. We can't --  
12 we do not have oversight on them writing an article.  
13 If they choose to use it, it's up to them.

14 Q Sure.

15 A Especially off the record.

16 Q And by contrast, you don't know for sure  
17 when you tell a journalist something off the record,  
18 precisely what they'll do with that information,  
19 right?

20 A Correct.

21 Q You have a general understanding and  
22 agreement that they're not going to print it, right?

23 A What do you mean?

24 Q Like you tell a journalist something is  
25 off the record, and you give them some -- whatever

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1 the information is you give them --

2 A Uh-huh.

3 Q -- your general understanding -- and tell  
4 me if I'm wrong -- is they are not going to print  
5 that information in whatever article they're working  
6 on, right?

7 A That's not correct. You mean -- you mean  
8 interpretation? That's what you mean? They're not  
9 going to print it to you; that's what you mean?

10 Q I'm -- I only want to understand it from  
11 your perspective.

12 A No --

13 Q So tell --

14 A -- that's not true.

15 Q -- me how you understand it.

16 A Well, off the record, you're not  
17 telling -- you can give someone information off the  
18 record and it's their choice they're going to use  
19 it. Report -- you're not going to just phone up  
20 someone and say, "off the record," and then they  
21 don't use it. You hope they do, but you can't tell  
22 them they're going to use it.

23 Q You hope they don't use it?

24 A It depends on the situation.

25 Q I'm just trying --

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1           A     Me, too. But it depends on the  
2 situation.

3           Q     Yeah. Okay.

4           A     There's a million different situations  
5 and scenarios that you are --

6           Q     I just --

7           A     -- trying to whittle down to one.

8           Q     I just want to try to understand your  
9 view of this.

10          A     Uh-huh.

11          Q     So am I right -- I think I'm  
12 understanding what you're saying is, it's possible  
13 if you call up a reporter and give them something  
14 off the record --

15          A     Uh-huh.

16          Q     -- you hope they don't print it, but it's  
17 possible that they could?

18          A     Possible.

19          Q     And it's possible they could use that  
20 information to go call other sources and try to get  
21 that information on the record that you provided to  
22 them off the record, right?

23          A     Possible.

24          Q     Have you had that happen to you in your  
25 career?

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1           A       I couldn't pinpoint it.

2           Q       Do you think at some point in your  
3 career, you've given a reporter information off the  
4 record that they then were able to go do  
5 investigative work, do some digging, and find that  
6 information from a source they could attribute it  
7 to?

8           A       Perhaps.

9           Q       And so the information you provided was  
10 never published, but the actual information they got  
11 from somebody else?

12          A       Perhaps.

13          Q       Okay. So off the record information can  
14 still be very useful to a journalist and going  
15 around and doing other research and doing other  
16 digging and trying to find stuff that might already  
17 be in the public record?

18          A       I'm sure.

19          Q       Okay. You write in this section:

20               (As read) :

21                       "TAG will confirm outlets intending on  
22 covering the story, especially those  
23 impactful to Justin, Jamey, and  
24 Wayfarer's interest, are fully briefed  
25 on the situation, including and not

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1 of whether you thought these were accurate or  
2 helpful messaging points?

3 A Not -- not at the time, no. I don't  
4 remember.

5 Q And it's your testimony, I think, that  
6 you had no view at this time whether Ms. Lively had  
7 a less than favorable reputation in the industry?

8 A At the beginning, like I testified, I did  
9 not know -- right at the beginning, I had no idea.

10 Q Did you believe at this point in time  
11 that when Ms. Lively wasn't able to get her way on  
12 set or behind the scenes, she involved her husband  
13 to create an imbalance of power between her and  
14 Mr. Baldoni?

15 A At what time?

16 Q At the time this document was created.

17 A I'm not sure if this was the exact time.

18 Q Okay. Do you see the scenarios that have  
19 been listed out?

20 A I do.

21 Q Do you see in the first scenario, you  
22 say:

23 (As read) :

24 "Depending upon the scope of her push,  
25 we recommend planting a seed earlier on

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1 BY MR. GOTTLIEB:

2 Q Okay. And I mean, here Ms. Case says  
3 that the team will focus on the social and digital  
4 elements and she gives some specifics on that?

5 A I see that.

6 Q And, again, you earlier testified  
7 Mr. Wallace was the only social or digital team that  
8 you had in mind for this work?

9 MR. GLOVER: Objection. Form.

10 THE WITNESS: No, I think earlier, I did  
11 say that we were reaching out to one or two in a  
12 different text message. But yes, in this instance,  
13 this was around Street Relations.

14 BY MR. GOTTLIEB:

15 Q Okay. This quote is a description of  
16 services that is describing the services that  
17 Street Relations would provide; is that right?

18 MR. FREEDMAN: Objection.

19 MR. GLOVER: Objection. Form.

20 THE WITNESS: I did not write this.

21 BY MR. GOTTLIEB:

22 Q Did you write any of this, Ms. Nathan?

23 A I didn't -- I don't think I did, no.

24 Q Okay.

25 A I'm not -- I could have, unless you want

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1 to show me something else. But I do not speak this  
2 kind of language either.

3 Q Okay. Is it possible that you received  
4 some language from Mr. Wallace that you provided  
5 that language to Ms. Case and that some of that  
6 language wound up here in this email?

7 MR. GLOVER: Objection. Form.

8 MR. FREEDMAN: Objection.

9 THE WITNESS: I mean, I don't recall  
10 that. But this isn't what we do, so she would have  
11 got the language somewhere.

12 BY MR. GOTTLIEB:

13 Q Okay. I just want to understand if  
14 you're saying it's possible or not possible that you  
15 provided some of this content to Ms. Case?

16 A I don't recall if it was me. I don't use  
17 this type of language, but I -- unless there's  
18 something that I'm like, here Katie, please write  
19 this. I honestly don't recall.

20 Q Okay. You see here Ms. Case writes:

21 (As read):

22 "The integral part is to execute all  
23 without fingerprints"?

24 A Yes, I do.

25 Q And that echoes something that you wrote

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1 in a document we looked at a little while ago about  
2 being -- efforts being untraceable, right?

3 A I can see that sentence, yes.

4 Q Was it your understanding that that was  
5 important to Mr. Heath in the services that would be  
6 provided in the social or digital space?

7 MR. FREEDMAN: Objection.

8 THE WITNESS: I can't think to what  
9 Mr. Heath was thinking. But I do know in situations  
10 like this, it's high stakes. You don't want -- it's  
11 confidential. You don't want -- you know, it's a  
12 crisis.

13 BY MR. GOTTLIEB:

14 Q Okay. And the bullet points that you see  
15 there.

16 A Uh-huh.

17 Q There is a description of services. Do  
18 you see those?

19 A After "specific efforts include"?

20 Q Yes.

21 A Yes.

22 Q And is it your understanding that these  
23 were services that Street Relations could provide if  
24 called upon to do so for the Wayfarer parties?

25 MR. GLOVER: Objection. Form.

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Again, I don't know exactly  
3 where she got the language from. If there was an  
4 email that I have missed in which it's either me or  
5 someone else doing it, I can -- but, you know, we  
6 don't -- I don't work in the digital space. Like,  
7 all of this is like a completely different language  
8 to me.

9 BY MR. GOTTLIEB:

10 Q I understand that and I promise you we'll  
11 look at that --

12 A That's fine.

13 Q -- that text that you're searching for.

14 A Yeah.

15 Q I'm really just trying to understand -- I  
16 mean, this was conveyed by Katie Case --

17 A Katie.

18 Q -- who works for you --

19 A Uh-huh.

20 Q -- to Mr. Heath --

21 A Uh-huh.

22 Q -- and it is a description, according to  
23 Ms. Case, following up on the social/digital  
24 conversation this morning with specifics about  
25 social and digital mitigation and remediation?

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: I can't speak to their  
3 work. I can only speak to my work.

4 BY MR. GOTTLIEB:

5 Q Street Relations was, in fact, engaged on  
6 a three-month term for \$30,000 a month; is that  
7 right?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: I'm happy -- I know they  
10 were engaged by Wayfarer, but if you have it, I can  
11 look at the terms.

12 BY MR. GOTTLIEB:

13 Q Okay.

14 MR. GOTTLIEB: Let's look at another  
15 document.

16 THE STENOGRAPHIC REPORTER: Exhibit 14.

17 (Exhibit 14 marked for identification.)

18 THE WITNESS: Thank you.

19 BY MR. GOTTLIEB:

20 Q Ms. Nathan, you've been handed what's  
21 been marked as Exhibit 14.

22 A Thank you.

23 Q Take a minute to look at it. This is a  
24 text message with the Bates Nos. KCASE 4802 through  
25 4805. The date is August 7th, 2024.

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1 A Thank you.

2 Thank you.

3 Q Ms. Nathan, Exhibit 14 is a text exchange  
4 between you and Katie Case on August 7th, 2024?

5 A Yes.

6 Q Do you see at 12:26 p.m., you write to  
7 Ms. Case that you're on with Jamie and Jen about  
8 social?

9 A I do.

10 Q 12:26 p.m.?

11 A Oh, yes, sorry.

12 Q You were on a call with Mr. Heath and Ms.  
13 Abel about the social however we describe this,  
14 the social plan?

15 A If I wrote that, yes, I was at that time.

16 Q And it looks like Ms. Case was not on  
17 that call with you. She says "let me know how it  
18 goes"?

19 A Yes, I see that.

20 Q You see then at 12:27 p.m., you send  
21 through a draft of the text we looked at earlier  
22 with the two quotes in it?

23 A I do.

24 Q And you said, "I think quote two" to  
25 Ms. Case.

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1 Do you see that?

2 A I see that.

3 Q And then at 12:36 p.m., you type out:

4 (As read):

5 "30K monthly for three month minimum,  
6 properly and strategically monitor  
7 damaging Reddit/subreddit, X, Discord,  
8 X or et cetera threads relating to  
9 concerning opposition and manage the  
10 narrative. This can only be done with  
11 legacy admin for each platform. They  
12 work for us."

13 A I see that.

14 Q Do you see that?

15 Q You wrote that?

16 A I did.

17 Q Where did you get that language?

18 A I'm not sure where -- who sent it to me.

19 Q Is there any person other than

20 Jed Wallace who could have sent that to you?

21 MR. GLOVER: Objection.

22 THE WITNESS: I wasn't speaking to anyone  
23 else on -- at this point for this case.

24 BY MR. GOTTLIEB:

25 Q And these -- these services are a

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1 description of services that you believe  
2 Jed Wallace Jed Wallace could provide, right?

3 MR. GLOVER: Objection. Form.

4 THE WITNESS: I do not understand what  
5 these services are, so -- half of them, I don't  
6 understand what they are.

7 BY MR. GOTTLIEB:

8 Q Okay. What half do you understand?

9 A I understand monitoring.

10 Q Okay.

11 A I do understand the Wiki situation  
12 because I've had different issues with that from my  
13 other clients. That's why you need admin editors,  
14 which is very aboveboard.

15 Q Okay.

16 A I don't

17 Q That's a reference to the second sentence  
18 here:

19 (As read):

20 "With seasoned admin editors on  
21 peripheral elements like Wikipedia and  
22 fan pages"?

23 A Yes, you need to have editors to be able  
24 to overlook Wikipedia these days. It's different to  
25 what it used to be.

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1 Q When you say "overlook," to watch changes  
2 to --

3 A To make sure the changes don't happen.  
4 Because even when people add changes into your  
5 pages, as I've had, it's difficult to change them  
6 afterwards. It used to be easy.

7 Q What does this mean in the parenthetical  
8 here:

9 (As read):

10 "This can only be done with legacy  
11 admin for each platform. They work for  
12 us"?

13 A I don't know. I know what legacy admin  
14 is.

15 Q What's that?

16 A Legacy admin is people that have been  
17 there for a long time; hence, the Wikipedia stuff.

18 Q People who have been where for a long  
19 time?

20 A Editors that can change Wiki. That's  
21 what I think.

22 Q Administrators at Wikipedia?

23 A I think so.

24 Q And you notice here it says, "each  
25 platform," right?

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1 A Yes.

2 Q And above in the sentence, there's a  
3 reference to "Reddit"?

4 A Uh-huh.

5 Q And X?

6 A Uh-huh.

7 Q And Discord?

8 A Uh-huh.

9 Q Those are platforms that have  
10 online  
11 content, right?

12 A Yup.

13 Q Presumably, they have admins?

14 A I have no idea.

15 Q Have you ever had a conversation with  
16 Mr. Wallace in the entire time you've known him  
17 about admins at Reddit?

18 A Not to my knowledge.

19 Q X?

20 A Not to my knowledge.

21 Q Discord?

22 A I don't even know what Discord is.

23 Q Then you write:

24 (As read):

25 "Again, the real value is when you can  
actively sway the algorithm with one

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1                   SEO-charged hub/site."

2                   Do you see that?

3           A        I see that.

4           Q        What does that mean?

5           A        I don't know.

6           Q        Why did you send this to Ms. Case to be  
7 written up into a document if you didn't know what  
8 it meant?

9           A        This was -- this is -- this was exactly  
10 this, which was the social/digital or the other one  
11 with the price for hiring digital.

12          Q        Okay. But you didn't -- you didn't know  
13 what it meant at all?

14          A        Like I said, half, some. But that's why  
15 I choose to work with external vendors that know  
16 about these things that I don't know about.

17          Q        Do you know what it means to actively  
18 sway the algorithm?

19          A        I have an idea.

20          Q        What is your idea?

21          A        To change an algorithm. To change  
22 something online.

23          Q        What does it mean to do that with one  
24 SEO-charged hub or site?

25          A        I don't know.

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1 Do you see that?

2 A I see that.

3 Q And then at 12:36 p.m., you type out:

4 (As read):

5 "30K monthly for three month minimum,  
6 properly and strategically monitor  
7 damaging Reddit/subreddit, X, Discord,  
8 X or et cetera threads relating to  
9 concerning opposition and manage the  
10 narrative. This can only be done with  
11 legacy admin for each platform. They  
12 work for us."

13 A I see that.

14 Q Do you see that?

15 You wrote that?

16 A I did.

17 Q Where did you get that language?

18 A I'm not sure where -- who sent it to me.

19 Q Is there any person other than  
20 Jed Wallace who could have sent that to you?

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22 THE WITNESS: I wasn't speaking to anyone  
23 else on -- at this point for this case.

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5 these services are, so -- half of them, I don't  
6 understand what they are.

7 BY MR. GOTTLIEB:

8 Q Okay. What half do you understand?

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10 Q Okay.

11 A I do understand the Wiki situation  
12 because I've had different issues with that from my  
13 other clients. That's why you need admin editors,  
14 which is very aboveboard.

15 Q Okay.

16 A I don't --

17 Q That's a reference to the second sentence  
18 here:

19 (As read):

20 "With seasoned admin editors on  
21 peripheral elements like Wikipedia and  
22 fan pages"?

23 A Yes, you need to have editors to be able  
24 to overlook Wikipedia these days. It's different to  
25 what it used to be.

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1 wolves?" at 7:31 p.m. And Ms. Chozick responds at  
2 7:40 p.m.:

3 (As read):

4 "I told our friend Josh that Melissa is  
5 a boss and has a cool client. Josh  
6 told his wife, who is a very prominent  
7 publicist. Sarah somehow told The  
8 Hollywood Reporter, and now they are  
9 doing a story on Mel."

10 A Uh-huh.

11 Q Do you see that?

12 A Yes.

13 Q That's a reference to The Hollywood  
14 Reporter story that was about you, right?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: But this is not true.

17 BY MR. GOTTLIEB:

18 Q This is not true?

19 A No.

20 Q Ms. Chozick just made that up?

21 A Not just made it up. This is -- This is  
22 not -- the way that you're characterizing it is not  
23 actually what happened.

24 Q How is it not what happened?

25 A Well, Josh, who we -- who I know very

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1 well, he is friends with Pamela McClintock, and,  
2 like, they all know each other -- they did not place  
3 this story on me.

4 Q Well, I didn't --

5 A You just did. You just said that --

6 Q I didn't say they placed the story.

7 A So --

8 Q There's a distinction between placing a  
9 story and a reporter learning information; is there  
10 not?

11 A Yes.

12 Q So Ms. Chozick here is saying that, "Josh  
13 told his wife, who's a prominent publicist." What's  
14 Josh's wife's name?

15 A Sarah.

16 Q And Sarah somehow told The Hollywood  
17 Reporter.

18 Do you see that?

19 A I see that.

20 Q You don't say anywhere in this chain, do  
21 you, that that's incorrect; do you?

22 A Yeah, because I didn't need to.

23 Q You -- they continue discussing down,  
24 about how:

25 (As read) :

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1 "You will hate this, but it needs to be  
2 done."

3 A Uh-huh.

4 Q And Ms. Chozick says:

5 (As read):

6 "I didn't mean to be your publicist,  
7 but this is good."

8 Do you see that?

9 A Uh-huh.

10 Q (As read):

11 "Rock star crisis PR"?

12 A Uh-huh.

13 Q You screenshot your conversation with  
14 Ms. McClintock on the next page and say:

15 (As read):

16 "I swear Amy"?

17 A Uh-huh.

18 Q And Ms. Chozick then has a few comments  
19 about what your conversation with Ms. McClintock  
20 might have been, right?

21 A Uh-huh.

22 Q It says:

23 (As read):

24 "Tell her to call me if she needs a  
25 reporter to say nice things about you."

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1 A Uh-huh.

2 Q And then Ashley says:

3 (As read):

4 "What publication?"

5 Ms. Chozick says, "THR."

6 And it continues down. And at no  
7 point -- I guess, why don't you point me to where in  
8 this conversation you see an understanding from your  
9 friends that what was described by Ms. Chozick at  
10 7:40 p.m. was just a joke. It didn't happen at all.

11 MR. FREEDMAN: Objection.

12 THE WITNESS: My friends are always --  
13 they are joking about me here.

14 BY MR. GOTTLIEB:

15 Q Right. And they're joking about you, but  
16 --

17 A There's a joke there. There's a joke at  
18 the end of it.

19 (As read):

20 "Men are always a problem."

21 This is the way my friends talk to me.

22 Q Your testimony is --

23 A Yes.

24 Q -- that this recitation of events:

25 (As read):

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1 A Sure.

2 Q How long have you known Jed Wallace?

3 THE WITNESS: I'm so sorry. Before we do  
4 this, can I use the bathroom?

5 MR. GOTTLIEB: Sure.

6 THE VIDEOGRAPHER: Off record. The time  
7 is 3:48 p.m. Please disconnect your microphones  
8 before you leave the table.

9 (Recess.)

10 THE VIDEOGRAPHER: The time is 4:10 p.m.  
11 We're back on record.

12 BY MR. GOTTLIEB:

13 Q How long have you known Jed Wallace?

14 A I've known Jed for around between five to  
15 six years.

16 Q How did you meet Mr. Wallace?

17 A Through a client.

18 Q Which client? And if you want to go AEO  
19 for any of this, you're welcome to.

20 A Sure, yes. I would like to.

21 MR. FREEDMAN: Yup. We're going to go  
22 AEO.

23 THE VIDEOGRAPHER: If any of the  
24 participants in the Zoom room need to be removed due  
25 to that, we do not have Mr. Heath present at the

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1 of as you sit here?

2 A I'm trying to think of what else there  
3 has been. There's been a fair few. There was --  
4 I'm trying to think what else. I can't -- you know,  
5 there's been -- there's a few. When you say not  
6 specifically the legal firms, it's legal firms that  
7 bring someone like me in. So that's where I get my  
8 relationships from. That's how I get hired, is by a  
9 legal. So no, not really.

10 Q Using the most recent experiences you've  
11 had with Mr. Wallace --

12 A Yeah.

13 Q -- can you describe what he does?

14 A He monitors digital and he works in the  
15 digital space. I do also have knowledge that he  
16 helps a lot of people as well. So he helps people  
17 who are either in active addiction, who have had  
18 addiction problems. So I do have knowledge that in  
19 his genre of work, that he does help people a lot.

20 Q Have you ever worked with Mr. Wallace on  
21 such a project?

22 A On addiction?

23 Q Yeah.

24 A No.

25 Q From the projects in which you have

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1 A I don't recall.

2 Q How about on the [REDACTED] matter?

3 What did Jed Wallace do in that matter?

4 MR. GLOVER: Objection, form.

5 THE WITNESS: I'm not too sure.

6 BY MR. GOTTLIEB:

7 Q Do you have any idea?

8 A No.

9 MR. GLOVER: Objection. Form.

10 BY MR. GOTTLIEB:

11 Q Is that by design, Ms. Nathan?

12 A Is what by design?

13 MR. FREEDMAN: Objection. Form.

14 BY MR. GOTTLIEB:

15 Q The fact that you are testifying that you  
16 do not know anything about what Jed Wallace does?

17 A I didn't testify that. I said I do know  
18 what I know what he does in my opinion, which is  
19 work in the digital space. I know that he works  
20 with people that are in active addiction and also  
21 getting them into addiction-type facilities. That's  
22 what I personally know.

23 Q What does "work in the digital space"  
24 mean?

25 A If I knew about digital, I would be the

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1 one doing it because you can make really good money  
2 doing it.

3 Q I certainly understand there's a  
4 distinction between being an expert in the digital  
5 space and an expert in searching and optimization  
6 and experts in the various things Mr. Wallace does  
7 and having a general knowledge or understanding of  
8 what some of that work entails.

9 A Yes.

10 Q So is it really your testimony that apart  
11 from that he works in the digital space, that you  
12 don't know anything more about what that means?

13 A That's why I hire someone else to do it.  
14 I do not work in the digital space. I don't even  
15 barely have social media myself.

16 Q How do you --

17 A But I know it's important.

18 Q Sorry.

19 A No. I know it's important. As I  
20 testified earlier, it's come to the situation right  
21 now that all legal firms, including your own, hire a  
22 digital service because we do not understand  
23 digital. I'm finding out more every day. Maybe  
24 next year, my answer might be different.

25 Q How do you know that it's not just all a

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1 fraud or a Ponzi scheme?

2 MR. GLOVER: Objection. Form.

3 THE WITNESS: I don't know.

4 BY MR. GOTTLIEB:

5 Q You don't know?

6 A How do I know? Yours how do I know?  
7 I know it's digital space that I do not understand.

8 Q Do you have a view one way or the other  
9 about whether Mr. Wallace is good at what he does?

10 MR. FREEDMAN: Objection.

11 THE WITNESS: Well, all the clients that  
12 I have worked with him on really like Jed. They  
13 really like the rapport they have with Jed and are  
14 happy with the work. That's why he's used so often  
15 in all the biggest legal firms, including quite a  
16 few here in Los Angeles today and probably  
17 elsewhere.

18 BY MR. GOTTLIEB:

19 Q You like him, right?

20 A I do like him.

21 Q He's a nice guy?

22 A He is a nice guy.

23 Q So -- okay. There's nothing else that  
24 you think you can tell me -- my original question on  
25 this line was about [REDACTED].

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1 A Yes.

2 Q What did you mean by that?

3 A Because you want to have someone that  
4 takes on both people, not just all men or women.  
5 You want to have someone that's fair and reasonable.

6 Q On the next page, 2154, there is another  
7 reference to a statement?

8 A Yes.

9 Q And you and Ms. Abel have a reaction to  
10 that. Again, you say here:

11 (As read):

12 "Career killer for them and Wayfarer.

13 No. Have to fight it."

14 Do you see that?

15 A Yes.

16 Q You say:

17 (As read):

18 "Lawyer up now."

19 A Yes.

20 Q So your view at this point was that  
21 Mr. Baldoni and Mr. Heath needed a litigator; is  
22 that right?

23 A Yes.

24 Q They needed to retain one immediately?

25 MR. FREEDMAN: Objection.

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1 THE WITNESS: I think in my opinion --  
2 I'm not a lawyer. I'm a crisis publicist and a  
3 normal publicist. I think Blake's behavior, what  
4 she had been showing, was entirely unreasonable. I  
5 think Leslie Sloane placing stories and the things I  
6 was starting to hear were becoming -- it was just --  
7 it was awful.

8 And Justin was petrified. And, really,  
9 why I was hired was to protect the movie. So yes, I  
10 was doing my job.

11 BY MR. GOTTLIEB:

12 Q You thought that there was a pretty good  
13 shot this was heading down the litigation path?

14 MR. FREEDMAN: Objection.

15 THE WITNESS: Again, I'm not a lawyer,  
16 but I did want them to speak to a lawyer because I  
17 am not a lawyer.

18 BY MR. GOTTLIEB:

19 Q On the next page, at 11:42 a.m., you say:

20 (As read):

21 "Can I start a Signal thread with you,  
22 me, and Jed, just in case you need him  
23 to connect you to Bryan because they're  
24 very close?"

25 Do you see that?

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1 Do you see that?

2 A Yes.

3 Q Because of the old case that happened to  
4 him when he was, I think, 19?

5 You see that?

6 A I see that.

7 Q And you said you needed to brainstorm on  
8 that?

9 A Yes.

10 Q Ms. Abel responds:

11 (As read):

12 "I didn't even think about that. Yes,  
13 I knew that from 1986."

14 Do you see that?

15 A I see that, yeah.

16 Q Ms. Nathan, did any representative of  
17 Ms. Lively ever make this argument, the argument on  
18 the second page, that this was why?

19 MR. FREEDMAN: Objection.

20 THE WITNESS: No.

21 BY MR. GOTTLIEB:

22 Q Did any representative of Ms. Lively ever  
23 say anything about this?

24 A No. But at that point we've been lied  
25 about, lied on. We had received death threats. I

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1 had to call my child's school. We wanted to move  
2 out of our house. My whole team and Jen, we were in  
3 complete states of panic and fear and shock because  
4 of the lies that had been spread about us.

5 We were kind of -- we were trying to be  
6 prepared, as is our job as to anything that you and  
7 your team might do.

8 Q Okay.

9 MR. GOTTLIEB: Can I get a time check,  
10 please?

11 THE VIDEOGRAPHER: 5:08.

12 MR. GOTTLIEB: All right. I think this  
13 is good time for a break.

14 THE VIDEOGRAPHER: The time is 4:49 p.m.  
15 Off the record.

16 (Recess.)

17 THE VIDEOGRAPHER: The time is 5:12 p.m.  
18 We're back on record.

19 THE WITNESS: Can I just correct the  
20 record on one thing that I remembered when I did  
21 some research after you asked me --

22 MR. GOTTLIEB: I'm gonna --

23 THE WITNESS: -- about the client I  
24 worked with, with Jed?

25 MR. GOTTLIEB: Sorry?

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1 Q In this text at 12:37 p.m., your  
2 testimony is --

3 A Talking to everyone -- sorry.

4 Q Your testimony is, that is a reference to  
5 talking the client off the ledge?

6 A Absolutely, yeah.

7 Q Okay. What were the two pieces you were  
8 referencing?

9 A The one that Leslie Sloane placed at the  
10 New York Post which was about Justin Baldoni. It  
11 was a negative piece with my sister, Sara Nathan.  
12 And I don't know the second one. I can't remember.

13 Q Was the second one a Daily Mail story?

14 A I can't remember.

15 Q Did you talk to your sister about that  
16 piece before it ran?

17 A Yes.

18 Q And in talking to your sister about that  
19 piece before it ran, you made certain arguments and  
20 provided certain information about things that you  
21 thought she shouldn't print, right?

22 A As I would do to every reporter, but the  
23 piece was negative against Justin Baldoni.

24 Q So the answer to my question is yes?

25 A Yes.

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1 so obvious."

2 A Yes.

3 Q How do you know that?

4 A I just -- it's my assumption because bots  
5 do look -- well, those, Hey, this product is great.  
6 Like I was saying, looks ridiculous.

7 Q Do you really -- have you really not had  
8 conversations with people in the digital space to  
9 understand the basis for what you said there?

10 A This is just from my -- how I am starting  
11 to learn about it. As I'm still now learning about  
12 it.

13 Q At any point in time, have you come to  
14 understand the very specific thing that Mr. Wallace  
15 was doing?

16 MR. GLOVER: Objection.

17 MR. FREEDMAN: Objection.

18 THE WITNESS: No.

19 BY MR. GOTTLIEB:

20 Q Were you ever curious about what he might  
21 be doing?

22 A No.

23 Q If you don't know what he was doing, how  
24 do you know that he was doing nothing, other than  
25 monitoring social media?

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1 A But that is what he was doing.

2 Q How do you know that?

3 A Because that's exactly what he told us he  
4 was doing. And he was monitoring something that we  
5 do not do, the social landscape and digital  
6 landscape.

7 Q When did Mr. Wallace tell you that the  
8 only thing he was doing was monitoring social media  
9 accounts?

10 A I do not recall the exact time and date  
11 he told me anything.

12 Q Okay. Does it make any sense to you at  
13 all, if the only thing Mr. Wallace was doing was  
14 monitoring social media accounts, why your  
15 colleagues at TAG repeatedly sent things to him to  
16 boost or amplify?

17 MR. GLOVER: Objection. Form.

18 THE WITNESS: Does it make sense to me?

19 BY MR. GOTTLIEB:

20 Q Yes.

21 A For positive things, yes. To look at.  
22 This is positive, yes.

23 Q Okay. So then your testimony is not that  
24 the only thing Mr. Wallace was doing was monitoring,  
25 right?

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1 (As read) :

2 "I can add many women who are part of  
3 the production. Not sure I should go  
4 too much deeper there, based on trying  
5 to make it look organic/like I don't  
6 have too much insider info."

7 Do you see that?

8 A I see that.

9 Q Do you feel like the video that  
10 Ms. Steele put out looked organic?

11 A I can't even remember it.

12 Q Did you ever watch it?

13 A I'm pretty sure maybe at the time, I did.  
14 Like I said, that period of time was absolutely  
15 horrendous. I was completely scared for myself and  
16 my child, and I really don't remember much. It was  
17 one of the worst possible times of my life. So no,  
18 I was not concentrating, and as you can see, I'm not  
19 on it. I didn't reply.

20 Q And I'm sorry about that, Ms. Nathan, and  
21 I'm sorry I have to ask these questions, but --

22 A I'm just trying to give you context.

23 Q Ms. Abel offers some comments, right?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: I can see her name, yes.

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1 sending process servers to people's homes, right?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: I do understand that.

4 BY MR. GOTTLIEB:

5 Q Would you have given that statement if  
6 you had known that Ms. Lively's lawyers reached out  
7 at the moment her lawsuit was filed in the Southern  
8 District of New York and asked your attorneys to  
9 accept service?

10 MR. FREEDMAN: Objection.

11 THE WITNESS: Well, if my -- if that was  
12 the case, then I wouldn't of -- the situation of  
13 when the process server came to my house and there  
14 was a tree on my roof and my kid was crying and we  
15 were about to evacuate, then that wouldn't have  
16 happened. So it was kind of a moot point. It  
17 wouldn't have happened.

18 BY MR. GOTTLIEB:

19 Q It wouldn't have happened unless your  
20 lawyers chose not to accept service, right?

21 MR. FREEDMAN: Objection.

22 THE WITNESS: I mean, I'm not sure but  
23 the -- if -- if I was -- that the -- that's how I  
24 was served, and I was served, I think the fires were  
25 on the 7th or the 8th, and I was served on one of

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1 those days. And I find it quite despicable that  
2 anyone was serving anyone when all the houses were  
3 burning and some of our team even lost their whole  
4 houses. So that's how I personally feel. Yeah.

5 BY MR. GOTTLIEB:

6 Q Ms. Nathan, I'm sorry that that happened  
7 to you.

8 A I'm not even asking for that. I'm just  
9 saying that --

10 Q I'm offering it to you.

11 A Thank you.

12 Q I'm sorry that that happened to you.

13 A Thank you.

14 Q That is why I will represent to you that  
15 we reached out to your attorney, who's sitting right  
16 next to you, and asked if he would accept service on  
17 your behalf. And I wish he would have said yes.

18 MR. FREEDMAN: Objection.

19 BY MR. GOTTLIEB:

20 Q Do you wish he would have said yes?

21 MR. FREEDMAN: Move to strike.

22 THE WITNESS: The whole -- I mean, I wish  
23 all of this wouldn't have happened, so...

24 BY MR. FREEDMAN:

25 Q Did you ever come to learn that your

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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 1st day of October, 2025.



ASHLEY SOEVYN

CSR No. 12019

**September 30, 2025**

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Page 1

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

3 ---000---

4  
5 STEPHANIE JONES, JONESWORKS  
6 LLC,

7 Plaintiffs,

8 vs. CASE NO. 1:25-CV-00779-LJL

9 JENNIFER ABEL, MELISSA NATHAN,  
10 JUSTIN BALDONI, WAYFARER  
11 STUDIOS LLC,

12 Defendants.

---

13 BLAKE LIVELY,

14 Plaintiff,

15 vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)  
16 25-CV-449 (LJL) (MEMBER CASE)

17 WAYFARER STUDIOS LLC, ET AL.

18 Defendants.

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19 \*\*\*CONFIDENTIAL\*\*\*

20 VIDEO-RECORDED DEPOSITION OF MELISSA NATHAN

21 Los Angeles, California

22 Tuesday, September 30, 2025

23 Stenographically Reported By: Ashley Soevyn,  
24 CALIFORNIA CSR No. 12019  
25

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Page 2

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

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5 STEPHANIE JONES, JONESWORKS  
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16 25-CV-449 (LJL) (MEMBER CASE)

17 WAYFARER STUDIOS LLC, ET AL.

18 Defendants.

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19 \*\*CONFIDENTIAL\*\*

20 Video-recorded Deposition of  
21 MELISSA NATHAN, taken on behalf of the Plaintiff  
22 Jonesworks, Pursuant to Notice, at the offices of  
23 Willkie Farr & Gallagher, 2029 Century Park East,  
24 Los Angeles, California beginning at 9:16 a.m. and  
25 ending at 8:00 p.m. on Tuesday, September 30, 2025,  
before me, ASHLEY SOEVYN, California Certified  
Shorthand Reporter No. 12019.

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1 MR. GOTTLEIB: Mike Gottlieb, Willkie  
2 Farr & Gallagher, on behalf of Ms. Lively.

3 MR. NATHAN: Aaron Nathan from Willkie  
4 Farr & Gallagher, on behalf of Ms. Lively.

5 MR. GLOVER: Joel Glover from Jackson  
6 Walker for Jed Wallace and Street Relations,  
7 Incorporated.

8 MS. BENSON: Summer Benson of Liner  
9 Freedman Taitelman & Cooley on behalf of the  
10 Wayfarer defendants.

11 MR. FREEDMAN: Bryan Freedman, same firm,  
12 on behalf of the deponent, Melissa Nathan, the  
13 Wayfarer parties, Jen Abel, who is present today,  
14 and Steve Sarowitz, Jamey Heath, and Justin Baldoni.

15 THE VIDEOGRAPHER: Thank you. Any  
16 remaining participants will be noted on the  
17 transcript.

18 Will our court reporter please introduce  
19 herself and swear in the witness.

20 THE STENOGRAPHIC REPORTER: Good morning,  
21 everybody. Ashley Soevyn, stenographic reporter,  
22 license 12019.

23 Ma'am, can I please have you raise your  
24 right hand?

25 Do you solemnly state that the testimony

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1 you're about to give in this deposition will be the  
2 truth, the whole truth, and nothing but the truth?

3 THE WITNESS: I do.

4 THE STENOGRAPHIC REPORTER: Great. Thank  
5 you.

6 THE WITNESS: Thank you.

7 EXAMINATION

8 BY MS. SHAH:

9 Q Good morning.

10 A Good morning.

11 Q My name is Maaren Shah. You heard I  
12 represent Stephanie Jones and Jonesworks in these  
13 matters?

14 A Yes.

15 Q And you were just sworn in by the court  
16 reporter. Again, do you understand that you, as you  
17 did yesterday, have a duty today to give true and  
18 accurate testimony?

19 A I do.

20 Q And you are under oath today with equal  
21 force as though you were in a court of law?

22 A I understand.

23 Q Is there any reason that you can't give  
24 full and complete testimony today?

25 A None.

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1 that popped up on the Internet in or around May of  
2 2024 about Stephanie Jones, right?

3 A From being sent them, yes. And knowing  
4 about them. Reading all the different articles,  
5 yes.

6 Q Is it your testimony that you are only  
7 aware of those websites because you were sent them  
8 or read publicly available articles about them?

9 A It is.

10 MS. SHAH: Okay. I'm going to hand you a  
11 series of documents.

12 THE WITNESS: Before you do that, can I  
13 just go to the bathroom really quickly?

14 MS. SHAH: Yeah. Of course. We can take  
15 a five-minute break.

16 THE VIDEOGRAPHER: Off record. The time  
17 is 11:30 a.m.

18 (Recess.)

19 THE VIDEOGRAPHER: The time is 11:50 a.m.  
20 We're back on record.

21 MS. SHAH: Okay. So we're going to hand  
22 you a series of documents, and I'm going to read  
23 them out for the record. If you'll just keep them  
24 in front of you.

25 THE WITNESS: Sure.

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1 MS. SHAH: Exhibit 54 is a document  
2 entitled, "Holding Clients Hostage: Stephanie Jones  
3 Leaks." It's marked NATHAN\_000003131.

4 (Exhibit 54 marked for identification.)

5 THE WITNESS: I see that.

6 MS. SHAH: Exhibit 55 is a document  
7 entitled "Stephanie Jones Leaks," and that bears the  
8 website domain <https://StephanieJoneslies.com/>.

9 (Exhibit 55 marked for identification.)

10 THE WITNESS: I see that.

11 MS. SHAH: Exhibit 56 is a document from  
12 what appears to be an X account or Twitter account  
13 under the name @lyingstephjones.

14 (Exhibit 56 marked for identification.)

15 THE WITNESS: I see that.

16 MS. SHAH: Exhibit 57 is what appears to  
17 be a Facebook account with the banner  
18 Stephanie Jones Leaks.

19 (Exhibit 57 marked for identification.)

20 THE WITNESS: I see that.

21 MS. SHAH: And Exhibit 58 is a Pinterest  
22 account with the banner Stephanie Jones Leaks.

23 (Exhibit 58 marked for identification.)

24 THE WITNESS: I see that.

25

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1 BY MS. SHAH:

2 Q Okay. And you have seen each of these  
3 documents in Exhibits 54 through 58 before; isn't  
4 that correct?

5 A I have seen this one.

6 Q Which one is that?

7 A This is the Holding Clients Hostage.

8 Q That's Exhibit 54.

9 A I have seen 54. Is 55 from 54?

10 Q Fifty-five is different. It is another  
11 website, stephaniejoneslies.com.

12 A I -- I mean, I don't know if they're the  
13 same thing for me. I have not seen this before.

14 Q Which exhibit is that?

15 A Fifty-eight. I have not seen 57 before.

16 Q Okay.

17 A And I know that I was sent a Twitter, but  
18 I really don't know if I have seen the majority of  
19 Exhibit 56 before.

20 Q Okay. Now, you had a role in the  
21 creation of the Stephanie Jones Leaks website that  
22 documented in Exhibit 54, right?

23 MR. FREEDMAN: Objection.

24 THE WITNESS: No.

25

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1 BY MS. SHAH:

2 Q You asked Katie Case to write copy for  
3 that website; isn't that true?

4 A That is not true.

5 Q And you also had a role in the creation  
6 of publication of Exhibit 56, the X account, right?

7 A No.

8 Q You asked Katie Case to write copy for at  
9 least five or six tweets that were posted on that X  
10 account in Exhibit 56, right?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: No.

13 BY MS. SHAH:

14 Q Is it your under-oath testimony that you  
15 had no involvement whatsoever in any shape or form  
16 in anything having to do with the website in  
17 Exhibit 54 and the X account in Exhibit 56?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: It is, yes.

20 BY MS. SHAH:

21 Q And if Katie Case testified to the  
22 contrary, would she be lying?

23 A Yes.

24 Q Are you aware that Katie Case testified  
25 that you asked her to write copy for the website in

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1 Exhibit 54?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: I was told that she did  
4 testify. I did not listen to her deposition. I was  
5 on a plane.

6 BY MS. SHAH:

7 Q Who told you that?

8 A I can't remember exactly who told me. It  
9 would have been one of my lawyers.

10 MR. FREEDMAN: So no information from  
11 your lawyers you should be disclosing.

12 THE WITNESS: Got you.

13 BY MS. SHAH:

14 Q Have you since read a transcript of her  
15 testimony?

16 A I have.

17 Q You have?

18 A Yes.

19 Q And so you have read what she testified  
20 about in this respect?

21 A I have.

22 Q Okay. So you're aware that she testified  
23 that you communicated to her to write copy for the  
24 website in Exhibit 54, including specific language  
25 that Stephanie holds clients hostage, that she leaks

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1 clients' secrets, and that she treats her employees  
2 poorly, amongst others; are you aware that she  
3 testified that?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: I read her testimony.

6 BY MS. SHAH:

7 Q And are you aware, then, that she  
8 testified that you communicated to her that she  
9 should write copy for the website in Exhibit 54,  
10 including specific language that Stephanie Jones  
11 holds clients hostage, that she leaks client  
12 secrets, and that she treats her employees poorly?

13 MR. FREEDMAN: Objection.

14 THE WITNESS: I'm aware of what she  
15 testified in her deposition, yes.

16 BY MS. SHAH:

17 Q And is it your under-oath testimony that  
18 when she testified that you communicated to her to  
19 write copy for the website in Exhibit 54, she was  
20 giving false testimony under oath?

21 A It is, yes.

22 Q Okay. And is it your under-oath  
23 testimony that when she testified in her deposition  
24 that you gave her specific language to write for  
25 this website, including that Stephanie Jones holds

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1 clients hostage, that she leaks clients' secrets,  
2 and that she treats her employees poorly, that she  
3 was giving false under-oath testimony?

4 A Yes.

5 MR. FREEDMAN: Objection.

6 BY MS. SHAH:

7 Q Okay. Are you aware that Katie Case  
8 testified that she received a call from you in early  
9 May and communicated to her that a website that  
10 became the website in Exhibit 54 had been requested?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: Am I aware that she  
13 testified that?

14 BY MS. SHAH:

15 Q Uh-huh.

16 A I don't actually recall that bit, but if  
17 it's in her testimony, then yes.

18 MS. SHAH: Okay. We're going to need to  
19 go on AEO.

20 MR. FREEDMAN: Okay.

21 BY MS. SHAH:

22 Q Have you read the entirety of Katie  
23 Case's deposition transcript?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: I think so.

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1 Q Okay. At [REDACTED]

2 A Yes.

3 Q If Katie Case testified that you asked  
4 her to draft the tweets about Stephanie Jones that  
5 appeared in Exhibit 56, the outlying Steph Jones X  
6 account --

7 A Uh-huh.

8 Q -- is it your under-oath testimony that  
9 Katie Case was giving false under-oath testimony?

10 A About me, yes, absolutely.

11 Q Okay. Do you have any personal knowledge  
12 about whether or not Katie Case did write the copy  
13 for the website in Exhibit 54?

14 A Now or then?

15 Q Personal knowledge.

16 A No, but when, time period?

17 Q Before.

18 A No.

19 Q Now?

20 A Given what she said that she wrote it,  
21 then yes.

22 Q Okay. Do you have any personal knowledge  
23 about whether or not Katie Case wrote five or six  
24 tweets that appeared on Exhibit 56, the X account?

25 A No.

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1 Q Okay. So you're saying you didn't ask  
2 her to do it, but you don't know whether or not she  
3 actually did it?

4 A I mean, she testified that she did it,  
5 correct?

6 Q Yes.

7 A So based on that and the conversations  
8 that I'm not allowed to -- then, yes. But before  
9 that, no, I did not. No.

10 Q Okay. And you are also aware that  
11 Jed Wallace had involvement in building or creating  
12 or publishing the website in Exhibit 54, right?

13 MR. GLOVER: Objection. Form.

14 MR. FREEDMAN: Objection.

15 THE WITNESS: No.

16 BY MS. SHAH:

17 Q If Katie Case testified that he did, is  
18 it your testimony that she would be giving false  
19 under-oath testimony?

20 A I can only talk to myself as to what I  
21 know about my own personal test -- you know, I can't  
22 speak to anyone else. But I have no knowledge of  
23 that.

24 Q Okay. And you just don't know one way or  
25 another if Jed Wallace had involvement in the

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1 website in Exhibit 54?

2 MR. FREEDMAN: Objection.

3 MR. GLOVER: Objection.

4 THE WITNESS: Correct. I don't know.

5 BY MS. SHAH:

6 Q And if Katie Case said she spoke to him  
7 about it, you don't have any basis to deny that?

8 MR. GLOVER: Objection. Form.

9 MR. FREEDMAN: Objection.

10 THE WITNESS: If I was not on any  
11 telephone calls between those two, if it did or did  
12 not happen, I was not on them.

13 BY MS. SHAH:

14 Q Okay.

15 You're aware that part of what  
16 Jed Wallace does for clients is to build websites,  
17 right?

18 MR. GLOVER: Objection. Form.

19 MR. FREEDMAN: Objection.

20 THE WITNESS: That is not to my  
21 knowledge, he builds websites.

22 BY MS. SHAH:

23 Q Say it in the language that you would  
24 prefer.

25 MR. FREEDMAN: Objection.

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1 connection with building websites?

2 A Yes.

3 MR. FREEDMAN: Objection.

4 BY MS. SHAH:

5 Q Okay.

6 Do you have any knowledge as to who was  
7 involved in any respect in the website about  
8 Stephanie Jones in Exhibit 54?

9 MR. FREEDMAN: Objection.

10 THE WITNESS: I do now.

11 BY MS. SHAH:

12 Q What is that knowledge?

13 A From Katie's testimony that she wrote it.

14 Q Anything else?

15 A No, I do not build websites. So no.

16 Q Have you ever been involved in a matter  
17 where a website was built?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: Just now, yes. And my own.

20 BY MS. SHAH:

21 Q What is your own?

22 A The one that you have, The Agency Group.

23 Q Okay. And when you say "just now," you  
24 mean the website that was built in connection with  
25 the -- the Lively litigations?

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1 A Correct.

2 Q Okay. What about for [REDACTED] ?

3 A No, I have not built any websites.

4 Q I'm not asking if you built websites --

5 A Uh-huh.

6 Q -- I'm asking if you've been involved in  
7 a matter where a website was built?

8 A No.

9 Q Including [REDACTED] ?

10 MR. FREEDMAN: Objection.

11 THE WITNESS: I have not been involved in  
12 that.

13 BY MS. SHAH:

14 Q Are you saying you were not involved in  
15 building the website, or are you saying that a  
16 website was not built in connection with the [REDACTED]  
17 [REDACTED] matter?

18 A Could you rephrase the question --

19 Q Sure.

20 A -- so I know exactly what I'm answering?

21 Q I don't want to get caught up in -- in  
22 the meaning of the word -- word "built" a website,  
23 so I'm trying to broaden the question in terms of  
24 your involvement in any capacity.

25 A Uh-huh.

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1 Q Your involvement in any capacity in a  
2 matter where a website was built?

3 A In any matter at all?

4 Q Yes.

5 A I already testified yes to that.

6 Q Which ones?

7 A The one in connection with the Lively.

8 Q Uh-huh.

9 A My own.

10 Q Uh-huh.

11 A And there could have been one previously  
12 for clients that back, back, back, I -- please show  
13 me, I -- maybe. But that's what I've been involved  
14 in.

15 Q Okay. Do you know whether [REDACTED]  
16 requested that Katie Case write copy for the website  
17 in Exhibit 54?

18 A I have never met [REDACTED]. I have  
19 never had any communication with him, so no, I don't  
20 know.

21 Q Apart from meeting [REDACTED] or having  
22 communication with [REDACTED] are you aware of whether or  
23 not [REDACTED] requested this website?

24 A No.

25 MR. FREEDMAN: Objection.

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1 part in the creation or publication of any website  
2 on behalf of any of your clients?

3 MR. FREEDMAN: Objection.

4 THE WITNESS: I think I testified to that  
5 previously that I have. I have probably in my  
6 lifetime of dealing with clients, talked about  
7 websites, my own for one.

8 BY MS. SHAH:

9 Q Any others?

10 A I don't know. If you can show me  
11 something that can refresh my memory, then sure.

12 Q I will show you, but --

13 A Great.

14 Q -- before we get to documents, I want to  
15 be very clear about your testimony with respect to  
16 Amanda Ghost.

17 A Sure.

18 Q Did you have any role whatsoever in  
19 discussing or conceiving or creating or causing to  
20 be created or published a website featuring  
21 Amanda Ghost?

22 MR. FREEDMAN: Objection.

23 THE WITNESS: To my knowledge, no.

24 MS. SHAH: Okay. Can you mark the  
25 websites and the social media accounts?

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1 BY MS. SHAH:

2 Q I am going to ask that same question with  
3 respect to any social media accounts featuring  
4 Amanda Ghost.

5 A To my knowledge, no.

6 MS. SHAH: Okay.

7 MS. ANASTASIO: This will be 65 through  
8 70.

9 THE WITNESS: Thank you.

10 MS. SHAH: So we're marking for the  
11 record a document marked Exhibit 60 -- What is this,  
12 five?

13 MS. ANASTASIO: That's 65.

14 MS. SHAH: Sixty-five, which is a  
15 printout of a website entitled "Amanda Ghost is a  
16 destroyer of worlds." And says "Update 9/5/2024".

17 (Exhibit 65 marked for identification.)

18 THE WITNESS: I can see that.

19 MS. SHAH: Marked as Exhibit 66 is a  
20 printout of an X account with the handle,  
21 @amandaghost11.

22 (Exhibit 66 marked for identification.)

23 MS. SHAH: Exhibit 67 is Pinterest  
24 account about Amanda Ghost and seemingly linking to  
25 Amandaghost.com, and appears to also bear a user

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: No. I was also working on  
3 two other matters for Bryan at 9:40 a.m. that same  
4 day.

5 BY MS. SHAH:

6 Q Was Jed involved in any of the other two  
7 matters you were working on for Bryan at that time?

8 A I can't recall.

9 Q Okay. Do you believe that they were  
10 asking you for copy on another matter?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: I could have background  
13 report something. Could be.

14 BY MS. SHAH:

15 Q Does copy typically mean background  
16 report?

17 A Yes, it can.

18 Q Really?

19 A Yes, it can.

20 Q Okay.

21 So if Katie Case testified that this was  
22 another website that she created at your request --

23 A Uh-huh.

24 Q -- in conjunction with Bryan Freedman and  
25 Jed Wallace, that would be false under-oath

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1 testimony?

2 MR. GLOVER: Objection. Form.

3 THE WITNESS: Yes.

4 BY MS. SHAH:

5 Q Okay.

6 Do you know who the [REDACTED]

7 are?

8 A Yes.

9 Q Who are they?

10 A They're [REDACTED]

11 [REDACTED]

12 Q [REDACTED]; is that  
13 right?

14 A Yes.

15 Q Were they ever your clients?

16 A They -- at the beginning of the crisis --  
17 their crisis situation, they reached out to hire us.  
18 We had one conversation with them, and said okay,  
19 before we knew more. And I have to -- I'm not sure  
20 of the time period. When we found out, I would say  
21 a couple of days, a day, two days, we declined to  
22 work with them.

23 Q Okay. So you ultimately declined to  
24 bring them on as clients of TAG; is that right?

25 A Correct.

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1 Q Okay. But notwithstanding that they were  
2 never clients of TAG, you did work with Katie Case  
3 to create a website in connection with their  
4 litigation, didn't you?

5 A I did not.

6 MR. FREEDMAN: Objection.

7 BY MS. SHAH:

8 Q And if Katie Case testified that you did,  
9 that would be false under-oath testimony; is that  
10 your testimony?

11 A Completely false.

12 Q Okay. Is Katie Case a huge liar?

13 A Apparently so, yes.

14 Q Okay. What reason does she have to lie  
15 about you?

16 MR. FREEDMAN: Objection.

17 THE WITNESS: I don't know how she is  
18 lying about me, apart from her being scared of  
19 Stephanie Jones. I don't know any other lies so far  
20 unless you tell me them.

21 BY MS. SHAH:

22 Q Okay. How long have you known  
23 Katie Case?

24 A Roughly, nine years -- I don't know.  
25 Something like that.

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1 business while at TAG building websites with  
2 Jed Wallace and Bryan Freedman?

3 MR. GLOVER: Objection. Form.

4 MR. FREEDMAN: Objection.

5 THE WITNESS: No, I don't -- no. I mean,  
6 to my knowledge, I do not know, no.

7 MS. SHAH: Okay. I'm going to show  
8 you -- you testified earlier that you were brought  
9 in at some point to work with [REDACTED] and  
10 [REDACTED] on a litigation involving [REDACTED],  
11 right?

12 A Yes.

13 Q Okay. And Jed was involved in working  
14 with them on that litigation as well, right?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: I can't remember. I  
17 only -- you only reminded me from my own text  
18 messages.

19 MS. SHAH: Okay. Let's mark this as...

20 THE STENOGRAPHIC REPORTER: 73.

21 (Exhibit 73 marked for identification.)

22 BY MS. SHAH:

23 Q Exhibit 73. It's an article dated  
24 June 2nd, 2021, entitled "[REDACTED] Hit by  
25 \$50 million Lawsuit by Former Goldman Sachs

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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 1st day of October, 2025.



ASHLEY SOEVYN

CSR No. 12019