

**September 18, 2025**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3  
4 BLAKE LIVELY, )  
Plaintiff, )  
5 v. )  
6 ) CASE NO.  
WAYFARER STUDIOS LLC, a ) 1:24-CV-10049-LJL  
7 Delaware Limited Liability )  
Company, JUSTIN BALDONI, an )  
8 individual, JAMEY HEATH, an )  
individual, STEVE SAROWITZ, an )  
9 individual, IT ENDS WITH US )  
MOVIE LLC, a California )  
10 Limited Liability Company, )  
MELISSA NATHAN, an individual, )  
11 THE AGENCY GROUP PR LLC, a )  
Delaware Limited Liability )  
12 Company, JENNIFER ABEL, an )  
individual, JED WALLACE, an )  
13 individual, and STREET )  
RELATIONS INC., a California )  
14 Corporation, )  
Defendants. )  
15 \_\_\_\_\_ )  
16

17 CONFIDENTIAL

18 ATTORNEY'S EYES ONLY

19 VIDEOTAPED DEPOSITION OF

20 WARREN ZAVALA

21 THURSDAY, SEPTEMBER 18, 2025

22 LOS ANGELES, CALIFORNIA

23 PAGES 1 - 303

24 REPORTED BY MARK SCHWEITZER

25 CSR #10514, RPR, CRR

1 A. Yes. 10:21:30

2 Q. Okay. I'm going to do my best to make this 10:21:30

3 as quick and painless as possible. 10:21:38

4 A. Okay. 10:21:38

5 Q. I don't know that that's possible, but I 10:21:41

6 will try. And if I'm talking too fast, stop me. 10:21:43

7 A. Okay. 10:21:47

8 Q. Also my questions may make certain 10:21:47

9 assumptions about facts that you know. If you don't 10:21:49

10 understand, if I use, for example, "William Morris" 10:21:52

11 instead of the entire corporate name of your company, 10:21:55

12 you'll understand what I'm talking about? 10:22:00

13 A. Yes. 10:22:02

14 Q. Okay. And if any case, you do not 10:22:02

15 understand again, please ask me to explain. 10:22:08

16 A. Okay. 10:22:09

17 Q. Okay. So what is your occupation? 10:22:10

18 A. Talent agent. 10:22:13

19 Q. How long have you been a talent agent? 10:22:15

20 A. 24 years. 10:22:16

21 Q. And who are you currently affiliated with? 10:22:19

22 A. WME. 10:22:22

23 Q. William Morris Endeavor? 10:22:24

24 A. Correct. 10:22:27

25 Q. Okay. I'm around so long, will you object 10:22:28

1 there are certain clients for whom you are personally 10:23:38  
2 responsible, correct? 10:23:42  
3 A. Yes. 10:23:42  
4 Q. Can you estimate about how many clients you 10:23:45  
5 have on the roster of clients for whom you are 10:23:47  
6 responsible primarily. 10:23:52  
7 MS. LEADER: Are you're asking right now? 10:23:56  
8 MS. GAROFALO: Huh? 10:24:02  
9 MS. LEADER: Right now? 10:24:02  
10 MS. GAROFALO: Yes, right now. Correct. 10:24:03  
11 Yes. 10:24:03  
12 THE WITNESS: A dozen. 10:24:03  
13 Q. BY MS. GAROFALO: Okay. And is Blake 10:24:06  
14 Lively one of those clients currently? 10:24:08  
15 A. Yes. 10:24:10  
16 Q. And how long have you been primarily 10:24:11  
17 responsible for Ms. Lively in your capacity as an 10:24:12  
18 agent? 10:24:15  
19 A. A decade. 10:24:16  
20 Q. Is Ryan Reynolds also a client for whom you 10:24:19  
21 have primary responsibility at William Morris? 10:24:26  
22 A. I'm one of two people. Yes. 10:24:30  
23 Q. Who is the other person? 10:24:30  
24 A. Doug Lucterhand. 10:24:31  
25 Q. Is there a particular division of 10:24:39

1 MS. LEADER: Just gonna object to the 10:39:50  
2 extent it calls for speculation. 10:39:52  
3 MS. GAROFALO: Okay. We don't do speaking 10:39:57  
4 objections. But just "objection" is sufficient. 10:39:58  
5 MS. GAROFALO: Can you please read back the 10:39:58  
6 question for Mr. Zavala. 10:39:58  
7 (Record read.) 10:40:20  
8 THE WITNESS: I don't know. 10:40:20  
9 Q. BY MS. GAROFALO: Do you know if that 10:40:37  
10 December -- strike that. 10:40:37  
11 Do you know whether Ms. Lively's written 10:40:38  
12 agreement provides for her to have a role in the 10:40:40  
13 editing of the movie? 10:40:42  
14 A. I do not. 10:40:49  
15 Q. I'm gonna jump ahead just a little bit. 10:40:58  
16 Do you know where the movie was filmed? 10:41:00  
17 A. Yes. 10:41:02  
18 Q. Where? 10:41:02  
19 A. New Jersey. 10:41:03  
20 Q. Were you ever on the set during filming? 10:41:07  
21 A. I was. 10:41:09  
22 Q. How frequently? 10:41:10  
23 A. I went twice. Which is one more time than 10:41:11  
24 I've ever gone to any set in 24 years. 10:41:16  
25 Q. Is there a reason? 10:41:19

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1	A.	Yeah. The same reason we're sitting here.	10:41:20
2	Q.	Excuse me?	10:41:23
3	A.	The same reason we're sitting here.	10:41:24
4	Q.	Okay. So -- and what is the reason we're	10:41:26
5		sitting here?	10:41:29
6	A.	I assume because there's a legal argument.	10:41:29
7	Q.	Okay. Let's go back to your first visit to	10:41:39
8		the set of It Ends With Us.	10:41:45
9	A.	Um-hm.	10:41:45
10	Q.	When, if you recall, did that occur?	10:41:46
11	A.	June of whatever -- the year that they shot	10:41:48
12		the movie. So I guess it was '23. It was right	10:41:52
13		before the -- the strikes or shutdown.	10:41:57
14	Q.	And what prompted you to visit the set in	10:41:59
15		June of 2023?	10:42:07
16	A.	Blake had brought it to our attention that	10:42:09
17		she was feeling uncomfortable with the movie, and it	10:42:13
18		was a, you know, very unique situation. And so I	10:42:16
19		made a plan to be there.	10:42:22
20	Q.	Okay. First question. You said that Blake	10:42:23
21		told "us." Who is the "us"?	10:42:29
22	A.	Me, her manager, Justin Grey Stone, and her	10:42:32
23		attorneys David Webber and Lindsey Strasberg.	10:42:37
24	Q.	Prior to visiting the set, your first visit	10:42:45
25		to the set in June of 2023, did Ms. Lively apprise	10:42:48

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1	A. Okay.	10:45:09
2	Q. BY MS. GAROFALO: Do you recall anybody	10:45:09
3	being present the first time you learned from	10:45:11
4	Ms. Lively that she was uncomfortable on the set of	10:45:15
5	It Ends With Us?	10:45:18
6	A. No.	10:45:18
7	Q. Then back to my original question. What	10:45:22
8	did Ms. Lively say to you in or about June 2023 about	10:45:26
9	being uncomfortable on the set of It Ends With Us?	10:45:31
10	A. I don't recall the exact sequencing of when	10:45:35
11	she told me what she told me in terms of what came	10:45:44
12	first, but she told me about the harassment. She	10:45:48
13	told me how she was feeling. And we had a number of	10:45:52
14	conversations from there as a team, and ultimately, I	10:45:58
15	went out there. I made sure Ange was out there and	10:46:04
16	sat there for a handful of days, and I know her	10:46:10
17	manager went out there at some point as well.	10:46:12
18	Q. Okay. So, she told you about harassment,	10:46:15
19	correct?	10:46:20
20	A. Um-hm.	10:46:20
21	Q. What specifically in that first	10:46:21
22	conversation that you recall with Ms. Lively did she	10:46:23
23	tell you on the subject of harassment on the set of	10:46:25
24	It Ends With Us?	10:46:28
25	A. I specifically can't remember.	10:46:28

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1           Q.    Okay.  And you said that there were a           10:51:55  
2           handful of other events.  What were the handful of           10:51:59  
3           other events prior to your first trip to the -- to           10:52:05  
4           the New Jersey set that you discussed with           10:52:08  
5           Ms. Lively?           10:52:11

6           A.    One was Justin said that she looked hot,           10:52:12  
7           and she told him that he didn't have the right to say           10:52:17  
8           that she looked hot.  She had told me that there was           10:52:19  
9           another actress on the film that had felt           10:52:24  
10          uncomfortable.  There was this, I believe, simulated           10:52:26  
11          sex scene they were about to have or some kind of           10:52:34  
12          romantic scene wherein he said something into her ear           10:52:37  
13          that -- and bit the nape of her neck which she felt           10:52:37  
14          like was outlandish.  He said, like, something like,           10:52:51  
15          You smell great.  He said something like, You smell           10:52:52  
16          great and then bit the nape of her neck.  And then           10:52:53  
17          there was Jamey Heath, during the birthing scene, had           10:52:58  
18          shown a video of a home birth of his child with his           10:53:03  
19          naked wife and that made her feel uncomfortable as           10:53:08  
20          well.           10:53:11

21                    I don't know whether or not all of these           10:53:12  
22                    things occurred prior to my visit.  But they were in           10:53:13  
23                    and around the same time.           10:53:16

24           Q.    Okay.  But you do recall that your visit           10:53:18  
25           was close to the time that the production was shut           10:53:21

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1 down because of the Writers Guild strike, SAG strike, 10:53:23  
2 correct? 10:53:29  
3 A. Yes. I think -- 10:53:29  
4 Q. All right. 10:53:29  
5 A. -- they shut it down -- I can't remember 10:53:31  
6 exactly when they shut it done. 10:53:33  
7 Q. Okay. But this was close to the time the 10:53:35  
8 production was shut down? 10:53:39  
9 A. Correct. 10:53:39  
10 Q. All right. And did you take any steps, 10:53:39  
11 other than visiting the set, to address the issues 10:53:41  
12 that Ms. Lively raised with you back in June of 2023? 10:53:44  
13 A. Her attorneys were -- what I had said to 10:53:46  
14 her at the time was I think for an issue like this, 10:53:52  
15 because it's outside the bounds of being normal, I 10:53:54  
16 think you should talk to a litigator and figure out 10:53:57  
17 what your rights and remedies are available to you. 10:54:00  
18 It's outside the lane of what I do for a living. And 10:54:02  
19 I -- those -- her attorneys arranged a conversation 10:54:07  
20 with her, with somebody. I don't know if that 10:54:09  
21 conversation happened prior to the shutdown or 10:54:11  
22 shortly thereafter. 10:54:14  
23 Q. Okay. Were you present for any of the 10:54:14  
24 conversations between Ms. Lively and her attorneys 10:54:19  
25 prior to your visit to the set in June 2023 -- 10:54:24

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1	Q.	And you understood that it had sexual	10:59:08
2		violence content as well, correct?	10:59:11
3	A.	Correct.	10:59:13
4	Q.	And to the best of your knowledge, did	10:59:14
5		Ms. Lively understand that the movie had sexual	10:59:18
6		content before she agreed to accept the role -- the	10:59:21
7		role as Lily Bloom?	10:59:27
8		MR. BRUNO: Objection. Form.	10:59:29
9		MS. LEADER: Join.	10:59:31
10	Q.	BY MS. GAROFALO: You can answer.	10:59:35
11	A.	You guys gotta give me a little direction	10:59:36
12		here.	10:59:39
13		I'm sorry. Repeat the question. My	10:59:39
14		apologies --	10:59:42
15		MS. GAROFALO: Can you please read it back.	10:59:42
16		Thank you.	10:59:43
17		THE WITNESS: Sorry.	10:59:43
18		(Record read.)	10:59:59
19		THE WITNESS: Yes.	11:00:00
20		MR. BRUNO: Same objection.	11:00:01
21	Q.	BY MS. GAROFALO: And did you, in fact,	11:00:03
22		discuss the subject matter of the film with	11:00:04
23		Ms. Lively before she accepted the role of Lily	11:00:07
24		Bloom?	11:00:11
25	A.	What specifically?	11:00:11

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1	Q. The sexual content.	11:00:12
2	A. Yeah, she wasn't gonna do anything that was	11:00:14
3	R-rated. So there were simulated sex scenes in terms	11:00:17
4	of a romance, but it wasn't -- I think the question	11:00:20
5	you're asking has varying degrees.	11:00:23
6	Q. Okay. Tell me what, if anything, you	11:00:26
7	discussed with Ms. -- with Ange Giannetti regarding	11:00:30
8	potential sex scenes in the movie before Ms. Lively	11:00:37
9	signed on.	11:00:43
10	A. I don't know if we did.	11:00:45
11	Q. So is it your testimony that Ms. Lively	11:00:47
12	told you that there were sex scenes, but there were	11:00:52
13	limits as to what she would do in connection with	11:00:58
14	those sex scenes?	11:01:01
15	MR. BRUNO: Objection. Form.	11:01:02
16	THE WITNESS: Does that mean I still	11:01:08
17	answer?	11:01:10
18	MS. GAROFALO: Yes.	11:01:11
19	THE WITNESS: Okay. You've got to help me	11:01:13
20	out here a little bit.	11:01:14
21	Q. BY MS. GAROFALO: I know. I should have	
22	given you that question. All right. I'm gonna give	
23	it you -- (inaudible cross talk)	
24	A. Give me a hand signal or something.	
25	Okay --	

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1	in an R-rated film.	11:03:48
2	Q. Specifically with regard to what she would	11:03:50
3	or would not do as an actress in a sex scene on the	11:03:55
4	movie It Ends With Us, what were your conversations	11:04:00
5	with Ms. Lively?	11:04:04
6	A. I didn't have --	11:04:05
7	MR. BRUNO: Objection. Form.	11:04:06
8	A. Didn't have any.	11:04:07
9	Q. BY MS. GAROFALO: Okay. Now, prior to your	11:04:09
10	visit to the set in June of 2023, did you have any	11:04:11
11	conversations with Ms. Lively in which she told you	11:04:15
12	that she had been asked to do something on the set	11:04:19
13	that she refused to do?	11:04:23
14	MR. BRUNO: Objection. Form.	11:04:26
15	THE WITNESS: I don't recall at that point	11:04:29
16	that she had refused to do something. I didn't get a	11:04:31
17	call from anybody about that.	11:04:36
18	Q. BY MS. GAROFALO: Did you provide	11:04:43
19	Ms. Lively with a script prior to the time she	11:04:44
20	accepted the role of Lily Bloom?	11:04:48
21	A. Um-hm. Sorry, yes, I did.	11:04:51
22	Q. And did you read the script?	11:04:55
23	A. I did.	11:04:56
24	Q. At the time prior to Ms. Lively's	11:04:56
25	acceptance of the role of Lily Bloom, did you find	11:05:01

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1	messages were not very complimentary?	01:44:44
2	MS. LEADER: Objection to form.	01:44:47
3	THE WITNESS: That is absolutely not true.	01:44:48
4	Q. BY MS. GAROFALO: Okay. Okay. Now, before	01:45:02
5	filming resumed, let's mark -- I think we're up to --	01:45:04
6	we at 5 or 6?	01:45:10
7	MS. LEADER: 5.	01:45:11
8	MS. GAROFALO: 5 -- as Exhibit 5, a	01:45:13
9	document Bates stamped Heath 45307 through 45311.	01:45:14
10	(Exhibit 5 for identification.)	01:45:20
11	THE WITNESS: Blakel.	01:46:02
12	Q. BY MS. GAROFALO: And you'd anticipated my	01:46:05
13	first question. Does this document refresh your	01:46:05
14	recollection as to what BLAKEL is?	01:46:07
15	A. Yeah, I just figured it out. It's her --	01:46:09
16	the name of her loan-out.	01:46:13
17	Q. Okay. And take a minute to look at this	01:46:21
18	document beginning on the -- you know what? Someone	01:46:23
19	didn't copy this correctly.	01:46:31
20	Okay. I'm sorry. It's been a long day.	01:46:37
21	On the first page of the document, there's a list	01:46:39
22	starting with 1 that continues on the next two pages.	01:46:41
23	Do you see that?	01:46:44
24	A. Yes.	01:46:45
25	Q. Just without sitting here and reading it	01:46:45

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1	carefully, can you tell us if you have any	01:46:49
2	understanding as to what that list is?	01:46:51
3	A. Is this the return to work?	01:46:59
4	Q. Just take a minute to look at the	01:47:05
5	document --	01:47:07
6	MS. LEADER: Take a minute. Yeah -- right.	01:47:08
7	THE WITNESS: Okay.	01:48:31
8	Q. BY MS. GAROFALO: Okay.	01:48:32
9	Do you recognize the list?	01:48:33
10	A. Yes, I've seen it before.	01:48:33
11	Q. What is it?	01:48:35
12	A. It's the return to work.	01:48:35
13	Q. What does that mean?	01:48:36
14	A. It's what was presented for her to be able	01:48:37
15	to return to work and finish the movie.	01:48:46
16	Q. Okay. This is a list that was presented to	01:48:48
17	Wayfarer as a condition of Ms. Lively returning to	01:48:51
18	complete the movie. Is that a correct statement?	01:48:58
19	A. Yes.	01:49:01
20	MR. BRUNO: Objection to form.	01:49:02
21	Q. BY MS. GAROFALO: And if -- if you know,	01:49:06
22	was Ms. Lively refusing to return to work on the	01:49:07
23	movie if Wayfarer did not agree to this list?	01:49:11
24	A. That's my understanding. I -- I wasn't a	01:49:16
25	party to the drafting of this or the presentation of	01:49:18

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1 sort of like her wanting to put it all to bed, sort 01:53:48  
2 of say her piece and move forward. 01:53:52

3 There was this notion that they were gonna 01:53:58  
4 be collaborative, and, you know, I went out to the 01:54:01  
5 set with Lindsey Strasberg. We spent the better part 01:54:02  
6 of a day in Jersey at her house, and it seemed to be 01:54:07  
7 the case. It was working well. And, you know, Todd 01:54:11  
8 Black and Ange Giannetti both pulled me aside to say 01:54:17  
9 how them collaborating together was making for better 01:54:21  
10 scenes, and they were feeling great about everything. 01:54:24  
11 Jamey was cordial. Alex was in good spirits. I saw 01:54:27  
12 her as well. 01:54:32

13 It seemed like we were in a much better 01:54:33  
14 place, and I think Blake was feeling very positive 01:54:36  
15 about the final phase of the movie. 01:54:39

16 Q. Okay. And another thing that she was 01:54:45  
17 requesting was that she be given a producer credit? 01:54:46

18 A. I think that was much later 01:54:49  
19 chronologically. 01:54:51

20 Q. Okay. At some point, she did make that 01:54:51  
21 request? 01:54:53

22 MR. BRUNO: Objection to form. 01:54:55

23 Q. BY MS. GAROFALO: Is that correct? 01:54:57

24 A. I had heard she had made that request, yes. 01:54:58

25 Q. Okay. And are you aware that she asked 01:55:00

1 correct statement? 02:00:21

2 A. Correct. 02:00:22

3 Q. Okay. Are you aware of any incidents that 02:00:22

4 made Ms. Lively uncomfortable during the second phase 02:00:27

5 of filming? 02:00:30

6 A. No. 02:00:31

7 Q. Your second visit to the set occurred 02:00:32

8 during the second phase of filming, correct? 02:00:38

9 A. Correct. 02:00:39

10 Q. And everything seemed to be going well, to 02:00:40

11 your observation, during that second visit, correct? 02:00:46

12 A. Yeah. Yes, correct. 02:00:49

13 Q. Did you personally hear any complaints from 02:00:50

14 Ms. Lively during the second phase of filming? 02:00:56

15 A. Yes, in the post-process around this 02:01:03

16 testing of the cut of the film. 02:01:05

17 Q. Okay. Other than an issue relating to a 02:01:06

18 testing of a cut of the film that Ms. Lively didn't 02:01:12

19 know about, any other complaints you heard from 02:01:15

20 Ms. Lively during the second phase of filming? 02:01:18

21 A. From that point forward, yes, there was 02:01:22

22 definitely issues in terms of her -- her interaction, 02:01:25

23 I think, with Justin and their collaboration in the 02:01:30

24 final stages of post. 02:01:40

25 Q. Okay. Tell me what you know specifically. 02:01:36

1           A.    An A-list actor is somebody that buyers --           03:27:04  
2    you know, there's a -- there's a finite amount of           03:27:10  
3    major worldwide theatrical distributors, I mean, a           03:27:13  
4    very small list.  Hopefully, there's not more           03:27:17  
5    consolidation and it doesn't get smaller, but the           03:27:21  
6    person that studios both want to have star in a film           03:27:24  
7    where they want to allocate a marketing span on a           03:27:27  
8    worldwide basis to support the movie that the actor           03:27:30  
9    is starring in, and also the pass the mom test, which           03:27:33  
10   is does your mother know their name.  And they're           03:27:36  
11   also famous, whatever that means, but they have --           03:27:42  
12   they have a level of fame, like, out in the zeitgeist           03:27:45  
13   but not for just being a celebrity.           03:27:48  
14           Q.    And in why your opinion, based on your           03:27:51  
15   experience in the industry, Ms. Lively possesses           03:27:53  
16   those attributes?           03:27:56  
17           A.    Absolutely.           03:27:56  
18           Q.    And Ms. Lively's been a client of yours for           03:27:57  
19   about a decade, right?           03:28:03  
20           A.    Yeah, I mean, from memory, I think it was           03:28:04  
21   probably 2015.  Whatever -- yeah.  '14, '15.           03:28:06  
22           Q.    So about 10 years?           03:28:11  
23           A.    Yeah, yeah.  Yeah.           03:28:12  
24           Q.    And can you describe the process you've           03:28:13  
25   worked with in terms of getting Ms. Lively           03:28:15

1 opportunities or roles in different films or 03:28:18  
2 television? 03:28:19

3 A. I don't think we've ever had any challenge 03:28:20  
4 in getting Blake a job. That's not actually been the 03:28:24  
5 challenge. And I think she worked quite a bit when 03:28:26  
6 we first started working together. And then when she 03:28:29  
7 had her first child, rightfully so, she's had four 03:28:31  
8 children in -- I don't remember the span, but it's 03:28:36  
9 been the last seven years, right? Something like 03:28:39  
10 that. So, you know, and she and Ryan tried to not 03:28:42  
11 work at the same time. I can't actually recall a 03:28:50  
12 time that they worked for more than a few weeks at a 03:28:51  
13 time on a job and -- and sort of been separated. 03:28:58  
14 And, yeah, so that -- so because of that, it's 03:29:02  
15 actually been more challenging to get her to do a job 03:29:03  
16 in a moment in which it is a good opportunity for her 03:29:08  
17 and also works for her lifestyle. And I think that I 03:29:12  
18 speak for her manager and I and sort of the rest of 03:29:21  
19 the -- if there is a team of agents that work on her 03:29:23  
20 behalf. We're constantly trying to find an 03:29:25  
21 opportunity that fits into that box. And I think It 03:29:29  
22 Ends With Us -- It Ends With Us presented this very 03:29:34  
23 unique opportunity where, due to its commercial 03:29:35  
24 success, it would've been propulsive enough, I think, 03:29:39  
25 to sort of elevate her to even another level. Sort 03:29:43

1 of marrying the commercial success and sort of the 03:29:50  
2 critical success that she had, like, with The Town, 03:29:54  
3 which was a supporting role, and kind of, you know, 03:29:57  
4 take the next elevation. This has just been a 03:30:02  
5 complication, but we'll ultimately get there. 03:30:09  
6 Q. Yeah, and we're gonna get to It Ends With 03:30:11  
7 Us and everything that's transpired after that. 03:30:14  
8 A. Yeah. 03:30:14  
9 Q. But I did have a couple of additional 03:30:15  
10 questions. You mentioned -- you testified earlier 03:30:17  
11 that it hasn't really ever been a challenge for Blake 03:30:19  
12 to get a job. Can you just explain that a little bit 03:30:21  
13 more? Are there more opportunities that present that 03:30:25  
14 if she wants them, she would get them? 03:30:28  
15 A. Historically, yes. I think that definitely 03:30:30  
16 when we started working together, it wasn't -- there 03:30:35  
17 wasn't as much coming through, but she did have Age 03:30:40  
18 of Adaline was something she was interested in come 03:30:45  
19 in through the door. Lee Toland Krieger did a great 03:30:48  
20 job with the movie. It ended up being a hit film 03:30:56  
21 predicated on its price. And that gave us lift, and 03:30:58  
22 then The Shallows really sort of worked on the studio 03:31:03  
23 level. And so since that moment, she's always been 03:31:07  
24 approached with material. It's just more a question 03:31:11  
25 of finding the right time and is it the right 03:31:13

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1	ended -- it was ended on a positive note?	05:01:46
2	A. It was -- I actually don't know. I think	05:01:52
3	it was ended on a positive enough note for her to	05:01:53
4	return to work. I don't know.	05:01:57
5	Q. Okay. Now, after the January 4th meeting,	05:02:09
6	did shooting for the film resume?	05:02:24
7	A. Yeah, shortly thereafter.	05:02:31
8	Q. Okay.	05:02:31
9	A. I feel like the meeting was, like, a	05:02:32
10	handful of days before they started photography.	05:02:34
11	Q. Okay. Now, when the strike occurred, how	05:02:38
12	much of the film had been completed?	05:02:41
13	MS. GAROFALO: Objection.	05:02:44
14	THE WITNESS: I'm unclear on that.	05:02:44
15	Q. BY MR. BRUNO: Okay.	05:02:47
16	A. I think we talked about this earlier. And	05:02:48
17	I feel like somewhere around half, but I don't	05:02:49
18	recall --	05:02:52
19	Q. Okay. Now, when shooting for the film	05:02:52
20	resumed, you testified that you were there physically	05:02:56
21	for some of the shooting; is that right?	05:02:59
22	MS. GAROFALO: Objection.	05:03:02
23	THE WITNESS: I did come out to the set,	05:03:03
24	yes, and spent the breadth of the day there.	05:03:05
25	Q. BY MR. BRUNO: Okay. And how would you	05:03:10

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1 describe the environment when you were there? 05:03:12

2 A. Positive. I think that Jamey seemed like 05:03:14

3 he was in good spirits. Lindsey Strasberg and I 05:03:19

4 spoke to Justin briefly. Everybody seemed to be 05:03:24

5 happy they were back at work. Todd and Ange, during 05:03:28

6 a setup, pulled me aside and said that she was really 05:03:32

7 collaborating with Justin, and they were getting much 05:03:37

8 better work and she had great ideas, and it felt 05:03:41

9 really positive. 05:03:44

10 Q. And in terms of Ms. Lively on-set, did you 05:03:46

11 observe -- strike that. 05:03:51

12 And what did you witness with respect to 05:03:53

13 Ms. Lively on-set? Was she collaborating with 05:04:07

14 Mr. Baldoni? 05:04:10

15 A. Yeah. She -- I watched a scene where they 05:04:11

16 were -- Justin was sort of directing, and she gave 05:04:14

17 him some ideas from across the living room of, like, 05:04:18

18 this or that, and Todd and Ange were sitting there in 05:04:22

19 Video Village, and they seemed like -- like it was 05:04:26

20 all -- she seemed happy. She -- I think she was 05:04:29

21 relieved that she was gonna be finishing the film, 05:04:32

22 and it felt good. 05:04:36

23 Q. And besides acting, did you observe 05:04:37

24 Ms. Lively do anything else on the production set? 05:04:40

25 A. No. We -- we spent some time together. 05:04:42

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1	Simple Favor?	06:26:42
2	A. Yes, the Simple Favor thing was a sequel,	06:26:42
3	and it was also a streaming deal. So I'd like to get	06:26:44
4	a theatrical deal in the same zone, if not more,	06:26:47
5	would be my hope. And get her to a better place	06:26:50
6	financially.	06:26:56
7	Q. Okay. And you testified that there were no	06:26:56
8	offers after It Ends With Us.	06:27:01
9	A. No meaningful or real offers, correct.	06:27:03
10	Q. And you qualified it by saying,	06:27:05
11	"meaningful." What do you mean by that?	06:27:10
12	A. Anybody can send a script that is remotely	06:27:11
13	in the business who wants to put together a project.	06:27:14
14	It doesn't mean they have the money to finance it or	06:27:16
15	make a bona fide offer or have a start date or have	06:27:19
16	distribution. So a meaningful offer, in my mind,	06:27:22
17	would be something that is either financed or has a	06:27:24
18	distributor or has an element involved that is	06:27:28
19	meaningful enough where you would -- you know, the	06:27:32
20	movie's gonna get done without her attaching herself	06:27:33
21	to it.	06:27:36
22	Q. Okay. And have you noticed there being	06:27:37
23	just generally less interest in Ms. Lively in films?	06:27:40
24	A. Yes.	06:27:43
25	Q. Okay.	06:27:43

1 STATE OF CALIFORNIA. )  
2 COUNTY OF LOS ANGELES )

3  
4 I, Mark Schweitzer, Certified  
5 Shorthand Reporter No. 10514, do hereby  
6 Certify:

7 That prior to being examined, the witness  
8 named in the foregoing deposition was by me duly  
9 sworn to testify the truth, the whole truth, and  
10 nothing but the truth;

11 That said deposition was taken down by me  
12 in shorthand and thereafter reduced to print by  
13 means of computer-aided transcription; and the same  
14 is a true, correct, and complete transcript of said  
15 proceedings.

16 I further certify that I am not interested in  
17 the outcome of the action.

18 Witness my hand this 19th day of September,  
19 2025.

20   
21

22 MARK SCHWEITZER, CSR #10514, RPR, CRR  
23 Certified Shorthand Reporter  
24 In and for the State of California