

July 31, 2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, STEVE SAROWITZ, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, THE AGENCY GROUP PR LLC, a Delaware Limited Liability Company, JENNIFER ABEL, an individual, JED WALLACE, an individual, and STREET RELATIONS INC., a California Corporation	Civ. Action No. 1:24-cv-10049-LJL (Consolidated for pretrial purposes with 1:25-cv-00449-LJL) Rel. 1:25-cv-00779-LJL
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Defendants.

- - - - - x

Videotaped Deposition of BLAKE LIVELY

New York, New York

Wednesday, July 30, 2025

10:15 A.M.

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Pages: 1 - 294
Reported By: Anita M. Trombetta, RMR, CRR,
California CSR No. 14647

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively
Conducted on July 31, 2025

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Videotaped deposition of BLAKE LIVELY, held at the
offices of:

Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019-6099
212.728.8000

Pursuant to notice, before Anita M. Trombetta, a
Certified Shorthand Reporter in the State of
California, RMR, CRR, and Notary Public in and for
the State of New York.

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively
Conducted on July 31, 2025

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

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(Appearances continued on next page.)

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively
Conducted on July 31, 2025

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A P P E A R A N C E S C O N T I N U E D

ON BEHALF OF WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE SAROWITZ,
IT ENDS WITH US MOVIE LLC, MELISSA
NATHAN, THE AGENCY GROUP PR LLC, and
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(Appearances continued on next page.)

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A P P E A R A N C E S C O N T I N U E D

ON BEHALF OF WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE SAROWITZ,
IT ENDS WITH US MOVIE LLC, MELISSA
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A P P E A R A N C E S C O N T I N U E D

ATTORNEYS FOR DEFENDANTS STREET RELATIONS,
INC. and JED WALLACE:

CHARLES L. BABCOCK, ESQUIRE

JOEL GLOVER, ESQUIRE

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713.752.4210

ALSO PRESENT:

JUSTIN BALDONI

STEVE SAROWITZ

MELISSA NATHAN

JENNIFER ABEL

JAMEY HEATH

ENRIQUE CASAS, Videographer

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

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WITNESS

BLAKE LIVELY

EXAMINATION BY

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ATTORNEY FREEDMAN

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ATTORNEY BABCOCK

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1	P R O C E E D I N G S	10:13:39
2	THE VIDEOGRAPHER: Here begins media	10:13:39
3	number 1 in the videotaped deposition of Blake	10:15:13
4	Lively, in the matter of Lively vs. Wayfarer	10:15:16
5	Studios LLC, et al., in the United States District	10:15:20
6	Court, Southern District of New York, Case Number	10:15:24
7	1:24-cv-10049-LJL.	10:15:31
8	Today's date is July 31st, 2025, and the	10:15:32
9	time on the video monitor is 10:15 A.M.	10:15:35
10	The videographer for today is Enrique	10:15:40
11	Casas, representing Planet Depos. This video	10:15:43
12	deposition is taking place at 787 Seventh Avenue,	10:15:44
13	New York, New York.	10:15:48
14	Would counsel please voice-identify	10:15:48
15	themselves and state who they represent.	10:15:51
16	ATTORNEY HUDSON: Esra Hudson on behalf of	10:15:54
17	Ms. Lively. With me here today is my co-counsel,	10:15:56
18	Michael Gottlieb at -- with Willkie Farr &	10:16:00
19	Gallagher; Stephanie Roeser with Manatt; Lindsey	10:16:03
20	Strasberg with Sloane Offer Weber & Dern; Kristin	10:16:08
21	Bender with Willkie; Michaela Connolly with	10:16:12
22	Willkie; and Aaron Nathan with Willkie.	10:16:16
23	ATTORNEY SHAH: Maaren Shah from Quinn	10:16:20
24	Emanuel Urquhart & Sullivan, on behalf of	10:16:22
25	Jonesworks and Stephanie Jones.	10:16:24

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1	ATTORNEY BABCOCK: Charles Babcock, Chip	10:16:27
2	Babcock, Jackson Walker, on behalf of Jed Wallace	10:16:30
3	and Street Relations.	10:16:35
4	ATTORNEY GLOVER: Joel Glover, also on	10:16:36
5	behalf of Jed Wallace and Street Relations.	10:16:38
6	ATTORNEY FREEDMAN: Bryan Freedman.	10:16:43
7	ATTORNEY BENSON: Summer Benson.	10:16:45
8	ATTORNEY SCHUSTER: Mitchell Schuster.	10:16:46
9	ATTORNEY GAROFALO: Ellyn Garofalo.	10:16:47
10	ATTORNEY AHOURAIAN: Mitra Ahouraian.	10:16:52
11	THE VIDEOGRAPHER: The court reporter	10:16:53
12	today is Anita Baker -- Anita Trombetta	10:16:53
13	representing Planet Depos. Sorry.	10:16:57
14	The witness will now be sworn in.	10:16:59
15	ATTORNEY HUDSON: Counsel, before we get	10:17:11
16	started, can we agree that the standard	10:17:12
17	stipulation under FRCP 32(d)(3)(a) will be applied	10:17:14
18	to this case?	10:17:18
19	ATTORNEY FREEDMAN: We can certainly talk	10:17:18
20	about it during the break.	10:17:20
21	ATTORNEY HUDSON: Well, it's that all	10:17:21
22	objections except to the form of the question are	10:17:22
23	reserved for trial.	10:17:24
24	ATTORNEY FREEDMAN: I understand that.	10:17:26
25	I'm happy to talk about it while we're off the	10:17:27

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1	record.	10:17:29
2	ATTORNEY HUDSON: Well --	10:17:29
3	ATTORNEY FREEDMAN: I don't think it's	10:17:30
4	going to be an issue.	10:17:31
5	ATTORNEY HUDSON: Okay. So we can agree,	10:17:32
6	though, that the rule will apply?	10:17:33
7	ATTORNEY FREEDMAN: We can definitely	10:17:35
8	agree that we can talk about it for sure, but I	10:17:36
9	want to talk to my co-counsel.	10:17:41
10	ATTORNEY HUDSON: That's the rule that	10:17:43
11	I'll be functioning under for the course of the	10:17:44
12	deposition, unless you disagree.	10:17:46
13	ATTORNEY FREEDMAN: Okay.	10:17:48
14	ATTORNEY HUDSON: And then I also wanted	10:17:49
15	to note for the record that per the protective	10:17:50
16	order in this case, ECF number 125, we're	10:17:52
17	designating Ms. Lively's entire deposition	10:17:55
18	transcript and video, including all testimony and	10:17:58
19	exhibits, as confidential.	10:18:01
20	We reserve the right to modify, elevate,	10:18:03
21	or remove this designation within the time period	10:18:06
22	set forth in the protective order.	10:18:09
23	And I also want to just clarify that	10:18:12
24	everyone in the room has signed the protective	10:18:14
25	order.	10:18:16

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1	ATTORNEY SCHUSTER: That's correct.	10:18:18
2	ATTORNEY HUDSON: Okay. Thank you.	10:18:20
3	B L A K E L I V E L Y, called as a witness,	
4	having been first duly sworn by a Notary Public,	
5	was examined and testified as follows:	
6	EXAMINATION BY	
7	ATTORNEY FREEDMAN:	
8	Q Good morning. What's your full legal	10:18:25
9	name?	10:18:27
10	A Blake Ellender Reynolds.	10:18:27
11	Q And what is your date of birth?	10:18:33
12	A 8/25/1987.	10:18:35
13	Q How long have you been an actress?	10:18:39
14	A 21 years.	10:18:42
15	Q Do you recall the year you started?	10:18:48
16	A Professionally, 2004.	10:18:51
17	Q You agreed to play the role of Lily Bloom	10:18:54
18	in It Ends With Us at the end of 2022; is that	10:19:03
19	correct?	10:19:09
20	A Yes.	10:19:09
21	Q Prior to that time, had you heard about	10:19:10
22	the book with the same title?	10:19:13
23	A Prior to agreeing?	10:19:16
24	Q Yes.	10:19:20
25	A Yes.	10:19:21

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1	Q And what did you learn about how large the	10:22:14
2	fan base was?	10:22:17
3	ATTORNEY HUDSON: Objection.	10:22:19
4	A Can you be more specific?	10:22:22
5	Q Sure.	10:22:23
6	When you first had learned about it having	10:22:24
7	a large fan base, what did you specifically learn	10:22:26
8	about the fan base?	10:22:29
9	A I -- I don't understand the difference in	10:22:31
10	the question, that it was a large fan base?	10:22:35
11	Q All right. Did you know how many people	10:22:38
12	that large fan base consisted of?	10:22:40
13	A No.	10:22:42
14	Q Did you know how many people had -- you	10:22:43
15	know, was there a following where a number of	10:22:53
16	people loved the book?	10:22:56
17	ATTORNEY HUDSON: Objection.	10:22:57
18	A I don't understand the question. I'm	10:22:59
19	sorry.	10:23:01
20	Q That's okay. I'll ask many questions that	10:23:01
21	will be unintelligible. I apologize in advance	10:23:05
22	for that. Let me -- let me try it a different	10:23:07
23	way.	10:23:09
24	Prior to accepting the role, did you know	10:23:15
25	what genre the book was?	10:23:17

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1	A I don't -- I don't know.	10:23:20
2	Q Do you recall whether it was a comedy or a	10:23:36
3	love story, and did you know anything like that	10:23:40
4	prior to accepting the role?	10:23:43
5	A Yes.	10:23:44
6	Q What did you know about the genre?	10:23:45
7	A I knew that there was -- well, prior to	10:23:47
8	accepting the role, I read the script. So it's a	10:23:51
9	little hard to differentiate the two. But, yeah,	10:23:55
10	I knew that there was romance. I knew that there	10:24:04
11	was drama. I knew that there was trauma. I knew	10:24:08
12	that there was levity. I knew that there were	10:24:12
13	many facets in this story.	10:24:14
14	Q And you knew that as a result of reading	10:24:16
15	the script or as a result of talking to someone	10:24:20
16	else prior to the time that you accepted the role?	10:24:22
17	A Reading the script.	10:24:24
18	Q Prior to accepting the role, were you	10:24:26
19	aware of what age demographic liked the book?	10:24:32
20	A I don't remember.	10:24:40
21	Q Prior to accepting the role, had you heard	10:24:40
22	of Colleen Hoover?	10:24:49
23	A No.	10:24:51
24	Q When did you first hear of Colleen Hoover?	10:24:51
25	A In that same phone call that I mentioned	10:25:01

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Transcript of Blake Lively
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1	Baldoni was?	10:30:56
2	A I was aware of him.	10:30:57
3	Q How were you aware of him?	10:31:02
4	A I am friends with and follow Liz Plank who	10:31:04
5	does a podcast with him. And I follow an account	10:31:13
6	called CelebrityKind, who has featured him before.	10:31:20
7	That was the extent of my awareness.	10:31:26
8	Q When did you first meet Liz Plank?	10:31:27
9	A I don't recall. Around 2020.	10:31:36
10	Q How did you meet Liz Plank?	10:31:39
11	A I don't -- I don't remember. We have a	10:31:46
12	lot of mutual friends.	10:31:53
13	Q Who are your mutual friends?	10:31:57
14	ATTORNEY HUDSON: Objection.	10:31:59
15	A Kate Vorhoff, Justin Trudeau. They're	10:32:02
16	people that -- with more degrees of separation	10:32:23
17	that we have run in the same circles as.	10:32:29
18	Q Now, I understand that you had heard that	10:32:33
19	Justin Baldoni was involved in the film.	10:32:40
20	What did you learn about what his	10:32:43
21	involvement was?	10:32:45
22	ATTORNEY HUDSON: Objection.	10:32:47
23	A I learned that he was the director and was	10:32:49
24	to star as the male lead in the film, as well as	10:33:01
25	retaining the rights, as Warren described.	10:33:06

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1	Q And did you have any concern prior to	10:42:58
2	accepting the role that that would be some sort of	10:43:02
3	an issue, that he would be both the lead actor and	10:43:06
4	also, you know, be the director?	10:43:13
5	A I have worked with actors before who have	10:43:19
6	been both the actor and director. So it's not	10:43:24
7	necessarily an immediate concern, but there are	10:43:34
8	many factors at play with each person.	10:43:39
9	Q And were there factors at play	10:43:44
10	specifically with Mr. Baldoni as the male lead and	10:43:47
11	the director during that time?	10:43:51
12	A Specific to him, not necessarily. Every	10:43:55
13	job, you have to consider all elements and all	10:44:04
14	factors.	10:44:06
15	Q Okay. Prior to accepting the role to play	10:44:07
16	Lily Bloom, had you met Justin Baldoni?	10:44:09
17	A Yes.	10:44:12
18	Q On how many occasions?	10:44:13
19	A One.	10:44:15
20	Q Where was that meeting?	10:44:17
21	A In New York City, in my apartment.	10:44:18
22	Q How long did that meeting last?	10:44:22
23	A I don't recall. It was a couple hours.	10:44:32
24	Q And do you recall when that meeting was?	10:44:38
25	A December of 2022.	10:44:44

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Transcript of Blake Lively
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1	Q And how was it determined that that	10:44:46
2	meeting would take place at your apartment in New	10:44:50
3	York City?	10:44:55
4	A Agents from my end. I don't know how it	10:44:55
5	was determined from anyone else's.	10:45:01
6	Q And do you recall the day that you	10:45:03
7	actually met Justin Baldoni in your apartment?	10:45:06
8	ATTORNEY HUDSON: Objection.	10:45:09
9	A Are you asking about the date?	10:45:09
10	Q Yes.	10:45:13
11	A No.	10:45:14
12	Q Do you know whether it was during the day	10:45:14
13	or in the evening?	10:45:18
14	A Day.	10:45:19
15	Q And who was present at that meeting?	10:45:20
16	A At the meeting -- well, the two of us were	10:45:28
17	in the meeting, but there were many people	10:45:42
18	present.	10:45:45
19	Q Who else was present?	10:45:46
20	A My sister was there. My family was there.	10:45:48
21	We have employees coming in and out constantly.	10:45:53
22	Q And tell me what you recall about that	10:46:00
23	meeting and what you said during that meeting.	10:46:07
24	A Can you be more specific?	10:46:10
25	Q Sure.	10:46:12

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Transcript of Blake Lively
Conducted on July 31, 2025

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1	Q Do you believe that you were personally	11:33:47
2	sexually harassed in connection with the making of	11:33:55
3	the film It Ends With Us?	11:33:57
4	ATTORNEY HUDSON: Objection.	11:33:58
5	A Yes.	11:34:00
6	Q Who do you believe sexually harassed you?	11:34:01
7	A Justin Baldoni and Jamey Heath.	11:34:08
8	Q Anyone else?	11:34:17
9	A If you're asking if my gender played a	11:34:19
10	role in the behavior towards me, I would add Steve	11:34:35
11	Sarowitz to that.	11:34:42
12	Q How did Steve Sarowitz sexually harass	11:34:44
13	you?	11:34:48
14	A He was the chairman of the studio, is my	11:34:49
15	understanding. And this is the studio that I was	11:35:13
16	raising concerns with. And instead of addressing	11:35:22
17	concerns, I believe that I was dismissed. And so	11:35:33
18	to use my own description, I do believe my gender	11:35:54
19	played a role in how I was treated.	11:35:59
20	Q Did you ever discuss with Steve Sarowitz	11:36:03
21	the fact that you were sexually harassed?	11:36:06
22	A No.	11:36:12
23	Q Did Steve Sarowitz ever say anything to	11:36:13
24	you that you felt was inappropriate or made you	11:36:30
25	uncomfortable?	11:36:34

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1	A To me? No.	11:36:35
2	Q Did Steve Sarowitz affirmatively do	11:36:42
3	anything himself that made you feel uncomfortable	11:36:50
4	or you felt was inappropriate?	11:36:57
5	A I felt him attending the birthing scene	11:37:01
6	was inappropriate.	11:37:05
7	Q When was the birthing scene?	11:37:07
8	A May of 2023.	11:37:19
9	Q What did Justin Baldoni do to sexually	11:37:20
10	harass you?	11:37:49
11	ATTORNEY HUDSON: Objection.	11:37:50
12	A Can you be more specific?	11:37:51
13	Q Sure.	11:37:58
14	You're claiming that Justin Baldoni	11:37:59
15	sexually harassed you, correct?	11:38:01
16	A Yes. It's a long complaint.	11:38:03
17	Q Is that "yes"?	11:38:05
18	A Yes.	11:38:09
19	Q What did he do to sexually harass you?	11:38:10
20	ATTORNEY HUDSON: Objection.	11:38:16
21	A There were a series of things.	11:38:18
22	Q Do you recall the first thing that he did	11:38:29
23	where you felt you were sexually harassed?	11:38:31
24	ATTORNEY HUDSON: Objection.	11:38:42
25	A There were things that he said and did	11:38:43

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1 where at the time, you don't totally -- you feel 11:38:51
2 confused by someone's behavior or words being at 11:39:11
3 odds with who they say they are. And you start to 11:39:22
4 see different pieces come together, and it 11:39:35
5 feels -- the workplace feels overwhelming. So 11:39:48
6 there were different moments. 11:39:52

7 Q What is the first thing that you recall? 11:39:54

8 A I recall him telling me that he's 11:40:00
9 circumcised. 11:40:07

10 Q When did he tell you that? 11:40:09

11 A In December of 2022. 11:40:15

12 Q And where were you physically when he told 11:40:20
13 you that? 11:40:25

14 A At my apartment. 11:40:27

15 Q Was that the same meeting that we were 11:40:29
16 previously discussing or a different meeting? 11:40:40

17 A It was the same meeting. 11:40:42

18 Q And how did that come up? Were you 11:40:43
19 discussing something or it just came up out of the 11:40:50
20 blue? 11:40:53

21 A I was pregnant and I didn't know the 11:40:53
22 gender of my child. And we were discussing 11:40:59
23 different decisions that parents make and 11:41:06
24 different factors, having boys versus girls. I 11:41:12
25 only had girls. And we were discussing the 11:41:19

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1	different medical decisions people make these	11:41:29
2	days, including circumcision for male babies.	11:41:32
3	Q And did he bring that up or did you bring	11:41:37
4	that up?	11:41:41
5	A I don't remember.	11:41:41
6	Q What did he say about circumcision?	11:41:42
7	A He told me the decision that they made for	11:41:50
8	their child. They, being him and his wife Emily.	11:42:00
9	And then he offered that he was circumcised.	11:42:05
10	Q And did you say anything in response to	11:42:10
11	that?	11:42:12
12	A I was in shock.	11:42:12
13	Q You say you were in shock. You couldn't	11:42:14
14	speak or?	11:42:19
15	A I don't know. I don't know what I -- I	11:42:21
16	don't know what I said or did.	11:42:26
17	Q Did you tell him that you were offended by	11:42:28
18	it?	11:42:33
19	A No.	11:42:34
20	Q Did you discuss with anyone the fact that	11:42:36
21	you were offended by him saying that?	11:42:40
22	A Yes.	11:42:42
23	Q Who did you -- who did you discuss that	11:42:46
24	with?	11:42:49
25	A My husband.	11:42:49

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1	Q When did you discuss it with your husband?	11:42:52
2	A I don't recall.	11:42:58
3	Q Was your husband in the apartment during	11:42:59
4	that meeting?	11:43:03
5	A I don't remember.	11:43:04
6	Q And were you offended by him talking about	11:43:06
7	the choices, the different choices that were made	11:43:16
8	and that him and Emily made the choice to have	11:43:22
9	their child circumcised, or were you just offended	11:43:25
10	by him saying that he was circumcised, or both?	11:43:32
11	ATTORNEY HUDSON: Objection.	11:43:36
12	A I was not offended by them sharing the	11:43:37
13	medical decisions they made for their child, no.	11:43:43
14	Q But you were offended by him sharing that	11:43:46
15	he was circumcised?	11:43:57
16	A The feeling was much more complex than	11:43:59
17	"offended," but I found it disturbing, yes.	11:44:04
18	Q I'm -- did he just bring it up out of the	11:44:09
19	blue or was he talking about it in context of his	11:44:13
20	parents making the decision?	11:44:17
21	ATTORNEY HUDSON: Objection.	11:44:18
22	A He told me the decision they made for	11:44:19
23	their child, and then he offered that he was	11:44:22
24	circumcised.	11:44:26
25	Q Did he say anything else about that?	11:44:27

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1	ATTORNEY HUDSON: Objection.	11:44:35
2	A About what? Can you be more specific?	11:44:35
3	Q About him being circumcised.	11:44:38
4	A About him being circumcised, that's all I	11:44:40
5	remember.	11:44:44
6	Q Did his comment in any way cause you to	11:44:45
7	reconsider whether you wanted to do the film or	11:44:58
8	not?	11:45:01
9	A I found it disturbing, but given that it	11:45:02
10	was one comment and he seemed nice, I wrote it off	11:45:12
11	as him taking a benign conversation too far and	11:45:22
12	hoped and assumed it would be an isolated	11:45:38
13	incident.	11:45:42
14	Q Did you ever tell him that he had taken	11:45:42
15	that comment -- and by making that comment, he had	11:45:48
16	taken that too far?	11:45:52
17	A Yes.	11:45:53
18	Q Okay. When did you tell him that?	11:45:54
19	A Me personally?	11:45:56
20	Q Yes.	11:46:01
21	A I believe the date was January 4th, 2023.	11:46:03
22	Q Prior to January 4th, 2023, had you told	11:46:10
23	him that he had taken that too far and that was an	11:46:20
24	inappropriate comment?	11:46:24
25	A That specific comment?	11:46:25

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1	Q Yes.	11:46:27
2	A No.	11:46:27
3	Q Is there a reason why you didn't say that	11:46:28
4	to him?	11:46:31
5	A There are a lot of reasons. He was my	11:46:31
6	boss.	11:46:40
7	Q He was your boss at that time?	11:46:40
8	A Not at that moment, but later. You asked	11:46:44
9	why I didn't say something later.	11:46:47
10	Q Is there a reason you didn't say something	11:46:48
11	at that time?	11:46:51
12	ATTORNEY HUDSON: Objection.	11:46:52
13	A I believe I already answered that	11:46:53
14	question.	11:46:56
15	Q Did you discuss with Warren Zavala that	11:46:56
16	comment that was made?	11:47:14
17	A I don't believe so, but I don't recall.	11:47:15
18	Q Did you discuss with anyone else -- anyone	11:47:19
19	else that represents you, like your manager or	11:47:33
20	your agents or anyone else like that, that he had	11:47:35
21	made that comment?	11:47:38
22	ATTORNEY HUDSON: Well, objection to the	11:47:39
23	extent that question calls for attorney-client	11:47:40
24	privileged communications.	11:47:42
25	If you can answer that question without	11:47:44

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1	revealing attorney -- communications with your	11:47:45
2	attorney, you can answer. But otherwise, I	11:47:49
3	instruct you not to answer.	11:47:51
4	A Can you be more specific with your timing?	11:47:52
5	Q Sure.	11:47:54
6	Did you -- after he had made that comment,	11:47:56
7	did -- after that meeting, did you tell your --	11:48:00
8	A Immediately after, is that what -- I just	11:48:02
9	want to understand.	11:48:04
10	Q At any time. I want to find out if there	11:48:05
11	is some point in time where you told your manager	11:48:07
12	or you told your agent, I'm just trying to find	11:48:09
13	out when that was, if there was a time that you	11:48:12
14	told them?	11:48:14
15	ATTORNEY HUDSON: Is your question limited	11:48:15
16	to manager or agent?	11:48:16
17	ATTORNEY FREEDMAN: Yes.	11:48:17
18	A I don't recall when or if I told them	11:48:18
19	that -- my manager or agent that specific comment.	11:48:35
20	I believe I did.	11:48:43
21	Q You believe you did.	11:48:44
22	You just don't recall whether you did or	11:48:46
23	not?	11:48:47
24	ATTORNEY HUDSON: Objection.	11:48:48
25	A I believe at some point before -- from the	11:48:49

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1	time that that comment was made until now, yes, I	11:48:59
2	do believe that I've discussed that with them.	11:49:02
3	Q Do you recall when you discussed it with	11:49:04
4	them?	11:49:08
5	I mean, was it closer to now or closer to	11:49:09
6	when the comment was made?	11:49:11
7	A I don't know.	11:49:13
8	Q And you said that you've discussed it with	11:49:14
9	your husband; is that correct?	11:49:22
10	A Yes.	11:49:24
11	Q When did you discuss it with your husband?	11:49:25
12	ATTORNEY HUDSON: Objection.	11:49:28
13	A Not immediately after.	11:49:29
14	Q When you say "not immediately after," was	11:49:43
15	there some point in the future when you did	11:49:45
16	discuss it with your husband?	11:49:47
17	A Yes.	11:49:49
18	Q And when was that?	11:49:49
19	A When more incidents occurred that made me	11:49:51
20	feel disturbed.	11:49:59
21	Q Did Justin say anything else during that	11:50:07
22	meeting in December to you that made you feel	11:50:18
23	uncomfortable?	11:50:24
24	A Not that I recall.	11:50:28
25	Q Did Justin in that meeting in December say	11:50:29

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1	A	Because he told me that he was rewriting	11:52:57
2		the script --	11:53:03
3	Q	Were you also --	11:53:08
4	A	-- and had almost entirely rewritten it.	11:53:09
5	Q	I'm sorry.	11:53:11
6	A	And had almost entirely rewritten it.	11:53:12
7	Q	In April of 2023, were you also rewriting	11:53:18
8		the script?	11:53:21
9	ATTORNEY HUDSON:	Objection.	11:53:24
10	A	Can you be more specific with the timing?	11:53:24
11	Q	Sure.	11:53:26
12		At any time in April of 2023, did you work	11:53:27
13		on a rewrite of the script?	11:53:31
14	A	Yes. After the events that I just	11:53:33
15		described to you, yes.	11:53:39
16	Q	In April of 2023, had you read the novel,	11:53:40
17		It Ends With Us?	11:53:51
18	A	No, I told Justin about my process very	11:53:52
19		early on.	11:53:57
20	Q	What do you mean by that?	11:53:57
21	A	I mean that I have adapted -- I've been a	11:54:00
22		part of book-to-film adaptations in many	11:54:07
23		circumstances, and sometimes -- there are times	11:54:14
24		where I've read the book in advance, and there are	11:54:17
25		times where I haven't because -- and I found that	11:54:19

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1	what works better for me is to not read the book	11:54:23
2	in advance because it is hard for me to see the	11:54:28
3	blind spots in the film because you can't unlearn	11:54:37
4	what you know from a book. You can't fill in	11:54:41
5	story or character holes from what you know from a	11:54:44
6	book. So I like to look at the film as its own	11:54:47
7	piece to make sure that it works on its own.	11:54:50
8	Q In April of 2023, did you know that there	11:54:58
9	were sex scenes in the novel, It Ends With Us?	11:55:01
10	A Yes.	11:55:06
11	Q And did you know what sex scenes there	11:55:06
12	were?	11:55:09
13	A I don't understand your question.	11:55:09
14	Q Sure.	11:55:14
15	The book It Ends With Us has sex scenes	11:55:17
16	within the book, correct?	11:55:23
17	ATTORNEY HUDSON: Objection.	11:55:25
18	A I believe so, yes.	11:55:27
19	Q You're not sure, though, right?	11:55:28
20	A I know there are sex scenes in the book,	11:55:31
21	yes.	11:55:36
22	Q Did you read the book?	11:55:36
23	A No.	11:55:38
24	Q How do you know that there are sex scenes	11:55:39
25	in the book?	11:55:45

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1	A	Because I was told.	11:55:45
2	Q	Who told you that?	11:55:53
3	A	I have since read -- I just want to be	11:55:57
4		more specific with the timing because you said,	11:55:59
5		"Did you read the book?"	11:56:01
6		Are we talking about April of 2023 what	11:56:03
7		time period are we talking about?	11:56:05
8	Q	We're talking about any time.	11:56:08
9	A	I have since read many chunks of the book.	11:56:10
10	Q	When you say "chunks," what parts of the	11:56:18
11		book did you read?	11:56:22
12	A	I -- the rooftops section. And I don't	11:56:23
13		remember specifically which other sections. It	11:56:30
14		was usually descriptive.	11:56:32
15	Q	When did you read the part of the book	11:56:34
16		that had the rooftop scene?	11:56:38
17	A	Spring of '24.	11:56:42
18	Q	Had you already rewritten the rooftop	11:56:52
19		scene by the spring of '24?	11:56:59
20	A	Yes.	11:57:04
21	Q	Did you read the sex scenes in the book It	11:57:08
22		Ends With Us?	11:57:17
23	ATTORNEY HUDSON:	Objection.	11:57:17
24	A	I don't recall.	11:57:18
25	Q	Do you know how many sex scenes there were	11:57:21

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1	A Yes.	11:59:12
2	Q And in terms of the additional sex scenes,	11:59:14
3	which ones were those?	11:59:32
4	A We're narrowing it just to sex scenes, I	11:59:36
5	just want to be clear about the way I described	11:59:40
6	it, which was sex scenes and gratuitous elements	11:59:42
7	within those scenes and others.	11:59:47
8	So do you mind asking the question again?	11:59:50
9	Q Sure.	11:59:52
10	What do you mean by "gratuitous elements"?	11:59:53
11	A The adding of explicit descriptives or	11:59:55
12	scenes that weren't initially intended to be	12:00:10
13	scenes that contained any aspect of intimacy now	12:00:16
14	containing that.	12:00:28
15	Q As you sit here today, can you recall	12:00:29
16	which ones those were?	12:00:32
17	A I remember a few, yeah.	12:00:33
18	Q Okay. Which ones do you remember?	12:00:42
19	A I remember a scene that was supposed to be	12:00:44
20	the character of Lily visiting Ryle in a hospital	12:00:51
21	as he tended to a child with, I believe, brain	12:01:01
22	cancer, and her observing him kindly and then	12:01:04
23	inviting him to dinner with her mom, becoming a	12:01:09
24	scene in which Lily pulls him into a medical	12:01:13
25	closet and starts role-playing naughty doctor with	12:01:17

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1	him as she invites him to dinner, asking him to --	12:01:24
2	I don't remember the literal words, but examine	12:01:35
3	her.	12:01:40
4	I remember the description of cunnilingus,	12:01:41
5	the inference being an important element and see	12:01:52
6	Lily's face as she experienced the pleasure. And	12:02:00
7	I remember Lily and Ryle climaxing at the same	12:02:07
8	time together on their wedding night.	12:02:18
9	Q And those were all added in there after	12:02:20
10	the script that you had reviewed when you agreed	12:02:35
11	to do the film; is that correct?	12:02:41
12	A Yes.	12:02:43
13	Q And at some point, did an intimacy	12:02:44
14	coordinator go over some of these scenes with you	12:02:49
15	and ask whether you were comfortable with them or	12:02:54
16	not?	12:02:56
17	A That would not be standard at that point	12:02:57
18	in production in my experience, in over 20 years.	12:03:00
19	Q At some point, did you express that --	12:03:05
20	express or cross out the cunnilingus scenes?	12:03:09
21	ATTORNEY HUDSON: Objection.	12:03:17
22	A I expressed discomfort with the sexual	12:03:18
23	additions.	12:03:24
24	Q Did you have reason to believe that those	12:03:35
25	were added to the scene not for a creative reason	12:03:37

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1	these additional gratuitous scenes; is that	12:05:02
2	correct?	12:05:06
3	A Yes.	12:05:06
4	Q Did you know whether or not those were	12:05:07
5	creative decisions that were made to add those	12:05:13
6	into the script?	12:05:17
7	ATTORNEY HUDSON: Objection.	12:05:20
8	A If you're asking if upon reading -- is	12:05:21
9	that the timing?	12:05:28
10	Q Yes.	12:05:29
11	A And then what's the question?	12:05:30
12	Q The question is, did you know whether they	12:05:31
13	were added because it was a creative decision that	12:05:34
14	was added that would make, in Justin's opinion,	12:05:36
15	the film better, or did you believe that they were	12:05:42
16	just added because he wanted to just add a bunch	12:05:43
17	of sex scenes in there?	12:05:47
18	ATTORNEY HUDSON: Objection.	12:05:48
19	A I wasn't sure.	12:05:49
20	Q Did you ask him?	12:05:50
21	A Did I ask him what?	12:05:51
22	Q Did you ask him whether he added those	12:05:53
23	gratuitously so that he could have more sex in	12:05:57
24	this scene and to -- to make it offensive towards	12:06:07
25	you, or was this a creative decision that he made?	12:06:11

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1	ATTORNEY HUDSON: Objection.	12:06:14
2	A I don't remember what -- I remember -- I	12:06:15
3	don't remember what was asked specifically. I do	12:06:29
4	remember expressing concerns with the additions.	12:06:32
5	And I also remember expressing understanding if	12:06:36
6	that was the film he needed to make creatively and	12:06:43
7	if our -- and if what he wanted to make now was	12:06:50
8	different than what I thought we were making, I	12:06:56
9	understood if he needed to work with someone else,	12:07:03
10	and I offered that.	12:07:06
11	Q When you said you expressed concerns, who	12:07:07
12	did you express those to?	12:07:12
13	A Justin Baldoni.	12:07:13
14	Q And when did you express that to him?	12:07:14
15	A After reading those pages, we had a	12:07:17
16	meeting.	12:07:25
17	Q Where did the meeting take place?	12:07:25
18	A At my office.	12:07:27
19	Q The office in the apartment?	12:07:28
20	A Yeah. This is a different one, but yes.	12:07:32
21	Q Do you recall the date of that meeting?	12:07:35
22	A I don't.	12:07:36
23	Q How long did that meeting last?	12:07:37
24	A I don't remember.	12:07:43
25	Q Do you remember specifically what you	12:07:44

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1	ATTORNEY HUDSON: Objection.	12:21:16
2	A I don't know.	12:21:16
3	Q Prior to January 2024, did you ask anyone	12:21:22
4	on your behalf to send a written complaint to	12:21:33
5	Sony?	12:21:38
6	ATTORNEY HUDSON: Well --	12:21:39
7	ATTORNEY FREEDMAN: She can answer "yes"	12:21:41
8	or "no."	12:21:43
9	ATTORNEY HUDSON: Well, objection to the	12:21:47
10	extent it calls for attorney-client privileged	12:21:48
11	communications.	12:21:51
12	In which case, I instruct you not to	12:21:53
13	answer, unless you can answer that question	12:21:54
14	without revealing privileged communications.	12:21:57
15	ATTORNEY FREEDMAN:	12:21:57
16	Q Yes-or-no answer.	12:22:00
17	A I was told by an executive at Sony that I	12:22:02
18	could not complain -- I could not file an HR	12:22:06
19	complaint through Sony.	12:22:09
20	Q Who told you that?	12:22:11
21	A Ange Giannetti.	12:22:12
22	Q And when did she tell you that?	12:22:18
23	A May of 2023.	12:22:19
24	Q Did she tell you that on the telephone or	12:22:21
25	in person?	12:22:23

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1	A Telephone.	12:22:26
2	Q Did you call her or did she call you?	12:22:27
3	A I believe I called her.	12:22:29
4	Q Do you know, was it in the evening or	12:22:36
5	during the day?	12:22:41
6	A I don't remember the exact time.	12:22:42
7	Q Do you recall when in May of 2023 that you	12:22:45
8	called her?	12:22:54
9	A Late May.	12:22:55
10	Q And what did you say to her?	12:22:56
11	A We spoke about a few things.	12:23:00
12	Q Do you recall what you said to her?	12:23:14
13	A Yes.	12:23:16
14	Q What do you recall?	12:23:20
15	A What I said to her in general or are you	12:23:22
16	asking --	12:23:27
17	Q As much as you can recall.	12:23:30
18	A I and my baby had contracted COVID from	12:23:34
19	the set, and we discussed that.	12:23:37
20	We discussed issues with scheduling and	12:23:48
21	that we weren't making our days. I asked her if	12:23:59
22	she was told that the crew was asked to come in	12:24:12
23	early so that I could attend a concert, because I	12:24:21
24	was -- I had a feeling that while I didn't solicit	12:24:32
25	that, it was offered to me as a way to make the	12:24:38

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1	day because we had a strict cutoff in Hoboken.	12:24:43
2	And we were falling behind and they wanted me to	12:24:51
3	come in early. And I was often coming in early	12:24:55
4	because we weren't making our days.	12:24:59
5	They said: Do you want to come in early	12:25:01
6	and we'll get you out for this concert?	12:25:06
7	And I said I -- I'm happy to come in	12:25:10
8	early. I don't -- I'm here to work. I don't need	12:25:14
9	to go to a concert. I'd love to go to a concert,	12:25:17
10	but that's -- I would not ask work to accommodate	12:25:20
11	that.	12:25:22
12	And they said: No, no, it's better for	12:25:23
13	us.	12:25:25
14	And I said: Okay.	12:25:25
15	And I had a feeling that it was being	12:25:26
16	presented as if I was the one that requested that.	12:25:29
17	So I asked her if that's how it was presented to	12:25:32
18	her; and she confirmed that, yes, it was presented	12:25:35
19	that I asked for everyone to come in early so that	12:25:36
20	I could get out for a concert.	12:25:39
21	And I expressed concerns with our first	12:25:42
22	AD, that I understood our other producer Alex Saks	12:25:48
23	to share. And I discussed wanting to file an HR	12:25:53
24	claim with Sony given experiences I had had with	12:26:00
25	Justin Baldoni and Jamey Heath.	12:26:11

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1	Q Did you tell her -- did you tell Ange	12:26:13
2	during that call what experiences you had with	12:26:21
3	Justin Baldoni and Jamey Heath?	12:26:23
4	A I started to. I started to, yes.	12:26:25
5	Q When you say you started to, can you tell	12:26:33
6	me what you recall saying to her?	12:26:39
7	A I recall telling her that while on set,	12:26:40
8	Jamey had approached me, asking if I had a minute	12:26:48
9	without telling me what he wanted to show me, and	12:26:56
10	that it was a video of a naked woman. And that I	12:27:00
11	was very concerned and disturbed and I asked him	12:27:09
12	to stop.	12:27:13
13	And I told her that I felt like the set	12:27:16
14	was untenable and unruly and that there was no	12:27:27
15	structure, and that there was no one in charge,	12:27:36
16	and that the people who were in charge were	12:27:45
17	misbehaving, and that I felt like I had nowhere to	12:27:48
18	go.	12:27:55
19	And she said, "Well, you can't file it	12:27:56
20	through Sony because we don't run physical	12:27:59
21	production. We're just the distributor. You have	12:28:01
22	to file it with Wayfarer."	12:28:04
23	And I said, "Well, so I file it with them	12:28:10
24	about them and they're meant to investigate	12:28:16
25	themselves and share the results and make it	12:28:20

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1 better and safer? Does any -- do you guys have 12:28:24
2 visibility into this?" 12:28:26

3 And she said this is -- "We don't oversee 12:28:28
4 physical production." 12:28:32

5 And I said, "Okay, then just please don't 12:28:34
6 say anything while -- I want to talk to my team 12:28:36
7 and I want to understand how to handle this, 12:28:39
8 because this is a really unique position." 12:28:43

9 You don't normally have the studio also be 12:28:46
10 the director, also be the co-star, also be the 12:28:49
11 financier. 12:28:59

12 When signing on to the film, I thought 12:28:59
13 Sony had a greater hand in the film, which is part 12:29:01
14 of what gave me confidence. And that was really 12:29:04
15 shocking and unsettling. And so I asked her not 12:29:06
16 to say anything while I figured out how to handle 12:29:10
17 it to make it safest and make the workplace 12:29:16
18 tenable for me and others. 12:29:19

19 I also expressed that others had had 12:29:23
20 experiences, but I wasn't going to speak for them. 12:29:27

21 Q When did you find out what Sony's role was 12:29:29
22 in connection with the film? 12:29:35

23 ATTORNEY HUDSON: Objection. 12:29:37

24 A That was the first moment that I 12:29:42
25 understood them not to have as meaningful of a 12:29:44

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Transcript of Blake Lively

Conducted on July 31, 2025

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1	Q Hi. Good afternoon.	13:38:04
2	I just want to walk through some of the	13:38:06
3	other allegations of sexual harassment.	13:38:09
4	One of the things that's alleged in the	13:38:16
5	amended complaint is, I believe that you're saying	13:38:18
6	that Justin complimented your outfit; is that	13:38:26
7	correct?	13:38:31
8	ATTORNEY HUDSON: Objection.	13:38:31
9	A No.	13:38:32
10	Q Are you saying that one of the instances	13:38:51
11	of sexual harassment or something that made you	13:38:52
12	otherwise uncomfortable was there was one day in	13:38:58
13	which Justin commented how much he liked your	13:39:03
14	outfit?	13:39:06
15	A No.	13:39:07
16	Q Did Justin ever say anything inappropriate	13:39:08
17	or that bothered you concerning an outfit that you	13:39:26
18	wore?	13:39:35
19	ATTORNEY HUDSON: Objection.	13:39:38
20	A There was an incident that made me	13:39:39
21	uncomfortable, yes.	13:39:50
22	Q And when was that incident?	13:39:53
23	A Late May of 2023.	13:39:58
24	Q Do you recall the date?	13:40:00
25	A I don't know the exact date, no.	13:40:02

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Transcript of Blake Lively

Conducted on July 31, 2025

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1	Q And do you recall where that took place?	13:40:15
2	A Yes.	13:40:17
3	Q Where did it take place?	13:40:20
4	A On a set, a bar set when we were	13:40:21
5	rehearsing.	13:40:30
6	Q That was that bar scene?	13:40:30
7	A No, it was -- we were rehearsing that	13:40:32
8	scene, but, no, it was not the scene. It was when	13:40:35
9	I arrived to work.	13:40:37
10	Q And can you tell me what happened?	13:40:38
11	A Can you be more specific? Sorry.	13:40:42
12	Q Sure.	13:40:46
13	What about whatever happened there made	13:40:47
14	you feel uncomfortable?	13:40:50
15	A I was wearing a -- I had a newborn baby,	13:40:51
16	and I had a jacket on and -- that was covering my	13:40:58
17	dress underneath. And I bent down to pick	13:41:04
18	something up, and the jacket opened. And my dress	13:41:08
19	was low-cut because it was easier to feed my baby.	13:41:13
20	And Mr. Baldoni said in front of -- Justin said in	13:41:23
21	front of -- I remember in front of Jenny Slate,	13:41:31
22	and I don't remember specifically who else was	13:41:39
23	there, but he said, "I like your outfit," and he	13:41:42
24	gestured at the chest.	13:41:46
25	Q You just made a movement of your hand.	13:41:51

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Transcript of Blake Lively

Conducted on July 31, 2025

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1	A Yes.	13:41:55
2	Q It's hard for the court reporter to mark	13:41:56
3	those down.	13:41:57
4	What do you mean he made a gesture of his	13:41:59
5	hand and said, "I like your dress"?	13:42:02
6	A He gestured across the chest.	13:42:04
7	Q Did he gesture across your chest or his	13:42:08
8	chest?	13:42:11
9	A He said, "I like your outfit."	13:42:12
10	Q He moved his hand up and down, like, above	13:42:17
11	and below his chest or your chest?	13:42:20
12	A I was standing in front of him, so I don't	13:42:22
13	know whose chest, but he didn't touch my chest --	13:42:28
14	Q Okay.	13:42:28
15	A -- if that's what you're asking.	13:42:33
16	Q When he made the gesture in front of his	13:42:34
17	chest, was his arm closer to his chest or closer	13:42:37
18	to your chest?	13:42:41
19	A I don't recall.	13:42:45
20	Q And what were you doing during this time?	13:42:46
21	Was it during a rehearsal of some sort?	13:42:57
22	A We weren't rehearsing the scene yet, but I	13:42:59
23	was on the set to rehearse the scene.	13:43:03
24	Q And who else was present, if anyone?	13:43:05
25	A The person I remember most is obviously	13:43:11

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Transcript of Blake Lively

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1	Justin Baldoni. And the other person I remember	13:43:20
2	is Jenny Slate. I know there were other people in	13:43:23
3	the room, but I don't know who experienced that	13:43:28
4	other than the people that I mentioned.	13:43:39
5	Q And when you say "experienced that," you	13:43:41
6	mean who else saw it, who else witnessed it?	13:43:44
7	A Yeah. I -- there may have been others who	13:43:46
8	saw it and witnessed it. I don't know.	13:43:48
9	Q And I apologize for asking this again.	13:43:50
10	I think you said you were wearing a	13:43:55
11	low-cut dress; is that correct?	13:43:58
12	A Under my jacket, yes.	13:44:00
13	Q And was the low-cut dress to facilitate	13:44:01
14	breastfeeding?	13:44:12
15	A Yes.	13:44:14
16	ATTORNEY HUDSON: Objection.	13:44:15
17	THE WITNESS: Sorry.	13:44:17
18	Q Was the jacket or coat that you were	13:44:18
19	wearing, was that an item that you personally	13:44:23
20	owned or was it something that the studio	13:44:27
21	purchased for the movie?	13:44:30
22	A I was wearing my own clothes.	13:44:32
23	Q Was it part of your costume for the role?	13:44:34
24	A No.	13:44:41
25	Q That wasn't -- that jacket wasn't in the	13:44:41

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Transcript of Blake Lively

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1	role at all?	13:44:46
2	A No.	13:44:47
3	Q Was it part of a pre-approved wardrobe for	13:44:48
4	the scene?	13:44:56
5	A No, I was in my own clothes. This was	13:44:56
6	rehearsal.	13:45:00
7	Q And can you describe the coat in detail?	13:45:00
8	A It was a blue corduroy jacket. It's my	13:45:04
9	husband's coat.	13:45:13
10	Q Can you describe any other parts of it?	13:45:14
11	A Yeah. It's a -- I don't know how to --	13:45:20
12	it's like a blazer style, I would want to say, but	13:45:27
13	an oversized blazer where the collar and	13:45:30
14	everything comes upward.	13:45:35
15	Q Is there a zip, zipper, or no?	13:45:37
16	A Buttons.	13:45:40
17	Q What was it made of, if you know?	13:45:41
18	A Corduroy.	13:45:47
19	Q So it wasn't fur; is that correct?	13:45:48
20	A Corduroy.	13:45:55
21	Q How long was the coat?	13:46:00
22	A To my thighs.	13:46:04
23	Q So would you say that's waist-length or	13:46:10
24	knee-length or ankle length -- I guess it's not	13:46:13
25	thigh-length, then, right?	13:46:16

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Transcript of Blake Lively

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1	ATTORNEY HUDSON: Objection.	13:46:18
2	A I don't know how else to describe it. It	13:46:19
3	was to my thighs.	13:46:21
4	Q Okay. And what color was it?	13:46:22
5	A Blue.	13:46:28
6	Q Was it a solid color or did it have a	13:46:29
7	print?	13:46:31
8	A It was solid.	13:46:31
9	Q And it closed with buttons; is that	13:46:33
10	correct?	13:46:36
11	A Yeah, there are buttons.	13:46:37
12	Q Not snaps?	13:46:39
13	A No.	13:46:41
14	Q Was Justin -- to your knowledge was Justin	13:46:42
15	able to see what you were wearing underneath the	13:46:48
16	coat?	13:46:51
17	A Not until I bent down, no.	13:46:52
18	Q And what happened when you bent down that	13:46:54
19	allowed him to see what you were wearing under the	13:47:00
20	coat?	13:47:03
21	A The coat opened up.	13:47:03
22	Q And when the coat opened up, it revealed	13:47:05
23	the dress?	13:47:12
24	A Well, can you be more specific what you're	13:47:12
25	asking?	13:47:22

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Transcript of Blake Lively

Conducted on July 31, 2025

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1	Q Sure.	13:47:22
2	When the coat opened up, was it just one	13:47:23
3	button that opened up or a bunch of buttons that	13:47:26
4	opened up? Did the entire coat open up?	13:47:28
5	A I never said the buttons opened up. I	13:47:30
6	don't know that the buttons opened up. I know	13:47:32
7	that the coat was covering me. And when I bent	13:47:34
8	down, it opened and it exposed the upper region	13:47:38
9	under the coat.	13:47:43
10	Q And was the upper region underneath your	13:47:45
11	coat, was that clothed?	13:47:48
12	A I was wearing a dress.	13:47:52
13	Q Is that yes, it was clothed?	13:47:55
14	A Yes.	13:47:58
15	Q Do you know how the jacket popped open?	13:48:00
16	A I bent down.	13:48:05
17	Q Had that ever happened to you before when	13:48:06
18	you bent down with that jacket?	13:48:11
19	ATTORNEY HUDSON: Objection.	13:48:12
20	A Sometimes jackets open when you bend down.	13:48:13
21	I don't know with that jacket specifically.	13:48:17
22	Q And how long was the jacket popped open	13:48:20
23	for?	13:48:24
24	A I don't know. Briefly.	13:48:29
25	Q And when you say "briefly," do you mean	13:48:31

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Transcript of Blake Lively

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1	one minute? Less than a minute?	13:48:34
2	A I don't know.	13:48:38
3	Q It wasn't more than three minutes, was it?	13:48:39
4	A I don't believe so, no.	13:48:44
5	Q The dress that was underneath the jacket,	13:48:47
6	was that something that you personally owned or	13:48:56
7	was it something that the studio purchased for the	13:48:58
8	movie?	13:49:02
9	A They were my clothes.	13:49:02
10	Q And was it part of the costume for your	13:49:03
11	role?	13:49:07
12	A No.	13:49:08
13	Q And what was the dress made of?	13:49:08
14	A I don't know the exact materials. I think	13:49:18
15	it was cotton and -- I don't know what else.	13:49:23
16	Q And how long was the dress?	13:49:34
17	A To my ankles.	13:49:37
18	Q Was the dress a print or a solid color?	13:49:40
19	A Solid.	13:49:45
20	Q And what kind of neck did the dress have?	13:49:46
21	Was it V-neck or a rounded neck or a square neck?	13:49:52
22	A I don't know what you mean by "neck."	13:49:56
23	There were straps on the dress.	13:50:06
24	Q Was the neck cut low or higher or?	13:50:08
25	A Yeah, it was low.	13:50:16

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Transcript of Blake Lively

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1	Q	Sorry for some of these questions.	13:50:17
2		Did your cleavage show?	13:50:25
3	A	I believe so, yes.	13:50:27
4	Q	Are you certain of that or you just	13:50:28
5		believe so?	13:50:31
6	A	Well, you have to be more specific with	13:50:33
7		the question.	13:50:35
8		Are you talking about the dress or --	13:50:36
9	Q	Yeah, did the dress show your cleavage?	13:50:40
10	ATTORNEY HUDSON:	Objection.	13:50:42
11	A	Yes.	13:50:43
12	Q	Did your nipples show?	13:50:45
13	A	No, not that I'm aware of.	13:50:51
14	Q	And the dress was specifically designed	13:50:58
15		for ease of breastfeeding; is that correct?	13:51:02
16	ATTORNEY HUDSON:	Objection.	13:51:06
17	A	I don't know what the dress was designed	13:51:07
18		for. I didn't design it.	13:51:09
19	Q	Was that the purpose of your wearing the	13:51:12
20		dress, to make it easier to breastfeed?	13:51:15
21	A	Yes.	13:51:18
22	Q	Did you always wear those types of dresses	13:51:19
23		or shirts that made it easier to facilitate	13:51:24
24		breastfeeding in May of 2023?	13:51:27
25	A	That was the only time I remember wearing	13:51:30

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Transcript of Blake Lively
Conducted on July 31, 2025

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1	that dress.	13:51:35
2	Q What about other types of clothing, did	13:51:36
3	you wear other types of clothing in May of 2023	13:51:42
4	where there were either low-cut dresses or shirts	13:51:44
5	to facilitate the ease of breastfeeding?	13:51:48
6	A I don't recall. I don't -- I was	13:51:54
7	breastfeeding often, so -- I had a newborn baby,	13:52:06
8	so -- but I don't often wear low-cut clothing to	13:52:12
9	work.	13:52:21
10	Q Was that something important in May of	13:52:22
11	2023, that you wear something that made	13:52:23
12	breastfeeding easier for you?	13:52:26
13	ATTORNEY HUDSON: Objection.	13:52:28
14	A I didn't have much time to feed my baby,	13:52:28
15	so if there was a way in which I could remain as	13:52:41
16	covered as possible while breastfeeding, that was	13:52:47
17	always a goal for me.	13:52:55
18	Q You said that Justin commented on how much	13:52:56
19	he liked your outfit; is that correct?	13:53:03
20	A Mm-hmm, yes.	13:53:05
21	Q Do you recall what his exact words were?	13:53:06
22	A I believe he said, "I like your outfit."	13:53:08
23	It was the inflection and the gesture that	13:53:20
24	felt uncomfortable to me.	13:53:23
25	Q And you specifically recall him saying the	13:53:28

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Transcript of Blake Lively

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1	word, "outfit"?	13:53:32
2	A I believe so.	13:53:36
3	Q And then you said it was the -- the	13:53:38
4	gesture that made you feel uncomfortable.	13:53:42
5	What do you mean by -- what do you mean by	13:53:48
6	that?	13:53:49
7	A I mean it was the hand gesture that he	13:53:49
8	made. I also said it was the inflection, the way	13:53:52
9	he said it, and the context surrounding the	13:53:56
10	moment.	13:53:59
11	Q Can you tell me about the inflection that	13:54:00
12	made it uncomfortable?	13:54:03
13	A Can you be more specific with your	13:54:06
14	question?	13:54:11
15	Q Sure.	13:54:12
16	You used the term "inflection" as one of	13:54:12
17	the things that made you feel uncomfortable.	13:54:15
18	Do you mean the tone of his voice?	13:54:19
19	A I mean, it -- there was a knowing	13:54:21
20	inflection. It wasn't a casual, in passing	13:54:29
21	inflection. I also hadn't just walked in, so it	13:54:38
22	wasn't the moment he saw the outfit. It wasn't	13:54:41
23	until I bent down and the coat opened that I got	13:54:44
24	the compliment on my outfit.	13:54:47
25	Q And in terms of the inflection, do you	13:54:49

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1	recall how that sounded?	13:54:54
2	A I recall how it felt.	13:54:58
3	Q Okay. How did it feel?	13:55:01
4	A I felt uncomfortable. I felt exposed. I	13:55:04
5	felt humiliated. I felt ashamed. And I felt	13:55:10
6	like -- I felt bad.	13:55:24
7	Q When Justin was saying that he liked your	13:55:28
8	outfit, do you know whether he was referring to	13:55:37
9	your coat or your dress or the combination of	13:55:38
10	both?	13:55:41
11	ATTORNEY HUDSON: Objection.	13:55:42
12	A It didn't feel like he was referring to	13:55:43
13	either.	13:55:49
14	Q Did it feel like he was referring to	13:55:53
15	something different than either the coat or the	13:55:55
16	dress?	13:55:57
17	A Yes.	13:56:02
18	Q What did it feel like he was referring to?	13:56:02
19	A It felt like he was referring to my chest	13:56:05
20	because he was gesturing.	13:56:08
21	Q And that gesture was with one hand; is	13:56:14
22	that correct?	13:56:18
23	A That's my recollection.	13:56:18
24	Q And the hand, did it go above his head	13:56:19
25	or --	13:56:25

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1	A	No.	13:56:25
2	Q	-- below his head?	13:56:26
3	A	It was in the chest area.	13:56:27
4	Q	And do you know how long that gesture	13:56:30
5		lasted for?	13:56:33
6	A	Long enough for me to feel awful.	13:56:34
7	Q	Did he do it a few times or just one time?	13:56:39
8	A	Do what a few times?	13:56:43
9	Q	The gesture with his hand.	13:56:46
10	A	I don't -- it was a gesture.	13:56:48
11		Are you asking how many times his hand	13:56:55
12		pumped up and down?	13:56:58
13	Q	I think I'm asking how many gestures he	13:57:00
14		made.	13:57:02
15		Was it one gesture or more than one	13:57:02
16		gesture?	13:57:05
17	ATTORNEY HUDSON:	Objection.	13:57:05
18	A	I don't understand your question.	13:57:06
19	Q	You said that he made a gesture, right?	13:57:08
20	A	Yes.	13:57:11
21	Q	And the gesture was with one -- was it	13:57:11
22		with his right arm or his left arm?	13:57:14
23	A	I don't remember which hand.	13:57:16
24	Q	And you said his gesture was going over	13:57:17
25		his chest up and down, right?	13:57:20

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1	A Yes.	13:57:22
2	Q And did he do that once or more than one	13:57:23
3	time?	13:57:26
4	A Did his hand go up and down more than one	13:57:26
5	time?	13:57:29
6	Q Yes.	13:57:29
7	A I mean, it went up and down, so it's one	13:57:31
8	gesture.	13:57:38
9	Q Okay.	13:57:39
10	A I'm not saying how many pumps it was. It	13:57:43
11	was the gesture covering the chest.	13:57:45
12	Q You don't know whether it was one or more	13:57:48
13	times?	13:57:51
14	A I don't understand your question.	13:57:51
15	Q Well, you indicated that it was a gesture	13:57:56
16	of where he went up, he went down --	13:57:58
17	A He didn't go like this (indicating). He	13:58:00
18	did not do that.	13:58:04
19	Q What did he do exactly?	13:58:05
20	A (Indicating) "I like your outfit."	13:58:06
21	ATTORNEY HUDSON: Let the record reflect	13:58:11
22	the witness has demonstrated.	13:58:12
23	Q So he said, "I like your outfit."	13:58:13
24	And can you describe where he moved his	13:58:15
25	hand, from what part of his body to the other part	13:58:17

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Transcript of Blake Lively
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1	of his body?	13:58:21
2	A I would say from here to here	13:58:22
3	(indicating).	13:58:26
4	Q When you say "here," it looked to me that	13:58:27
5	it was maybe your solar plexus?	13:58:29
6	A No. I'm saying probably in the -- my	13:58:31
7	ribcage.	13:58:39
8	Q From -- so he made the gesture from the	13:58:41
9	ribcage to where?	13:58:44
10	A I mean, across where breasts would be. We	13:58:49
11	could be a bit more explicit, I think.	13:58:53
12	Q And did he stop at the chin or right below	13:58:55
13	the chin?	13:58:59
14	A Where breasts would be.	13:58:59
15	Q What did you say, if anything, after	13:59:01
16	Justin complimented your outfit?	13:59:11
17	ATTORNEY HUDSON: Objection.	13:59:14
18	A I don't remember, but I remember grabbing	13:59:16
19	my coat and covering myself.	13:59:20
20	Q Have you ever complimented anyone's outfit	13:59:22
21	or what they were wearing while making the film?	13:59:37
22	ATTORNEY HUDSON: Objection.	13:59:40
23	A I don't recall the specifics.	13:59:41
24	Q Do you recall complimenting somebody's	13:59:55
25	outfit generally?	13:59:59

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1	ATTORNEY HUDSON: Objection.	14:00:00
2	A I -- that's a broad statement.	14:00:03
3	Have I ever complimented someone's outfit?	14:00:06
4	Q Do you recall it? During the making of	14:00:09
5	this film, do you recall complimenting anyone's	14:00:10
6	outfit.	14:00:14
7	ATTORNEY HUDSON: Objection.	14:00:14
8	A A specific recollection of a moment of	14:00:15
9	complimenting someone's outfit, specifically, no,	14:00:20
10	I don't have a specific memory.	14:00:23
11	Q Has anyone else ever complimented your	14:00:30
12	outfit or what you were wearing during the making	14:00:33
13	of the film?	14:00:35
14	ATTORNEY HUDSON: Objection.	14:00:35
15	A Yes.	14:00:42
16	Q Who else did that?	14:00:43
17	ATTORNEY HUDSON: Objection.	14:00:45
18	A I don't remember specifically, but I do	14:00:46
19	remember people being complimentary of the	14:00:54
20	wardrobe.	14:01:00
21	Q When you say "people," there was more than	14:01:02
22	one person that complimented your outfit during	14:01:05
23	the making of the film?	14:01:07
24	A Yes, I remember compliments on wardrobe.	14:01:09
25	Q Were you offended by any of those	14:01:12

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1	comments?	14:01:19
2	A No. I never had anybody -- the context	14:01:20
3	surrounding the interaction I had with Justin	14:01:26
4	Baldoni.	14:01:29
5	Q Do you recall -- I may have asked you this	14:01:30
6	before. I believe you said in May of 2023.	14:01:42
7	Do you recall the specific date?	14:01:45
8	ATTORNEY HUDSON: Objection.	14:01:46
9	A I don't -- I don't know the exact date,	14:01:47
10	no.	14:01:54
11	Q Another instance of sexual harassment that	14:01:55
12	you've identified is that Justin called you or	14:02:00
13	what you were wearing sexy and hot.	14:02:06
14	Are you aware of that?	14:02:09
15	A Am I aware of what?	14:02:10
16	ATTORNEY HUDSON: Objection.	14:02:12
17	Q Are you aware that that's one of the	14:02:12
18	allegations that you're saying that was sexual	14:02:14
19	harassment is that Justin said that either what	14:02:17
20	you were or what you were wearing was sexy or hot?	14:02:21
21	A Can you be specific? You're saying "or."	14:02:25
22	Q Sure. Let me actually let you use your	14:02:28
23	own words.	14:02:31
24	Can you tell me what the circumstances	14:02:31
25	were when Justin used words like "sexy" or "hot"?	14:02:33

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Transcript of Blake Lively
Conducted on July 31, 2025

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1	Do you recall an instance like that?	14:02:39
2	A Yes, those words were used. I have a lot	14:02:41
3	of recollection of, in general, words like that	14:02:50
4	being used.	14:02:55
5	Q Do you have a specific recollection of a	14:02:56
6	day, time, or scene that Justin had used those	14:03:02
7	words?	14:03:08
8	A They would be used in the context of the	14:03:09
9	film, scenes that needed to be sexy, characters or	14:03:12
10	wardrobe. Yeah, that would be used in that way.	14:03:26
11	That never made me uncomfortable.	14:03:35
12	Q Okay. So is it fair to say that any time	14:03:37
13	that Justin either used the term "sexy" or "hot,"	14:03:40
14	that didn't make you feel uncomfortable; is that	14:03:44
15	correct?	14:03:46
16	ATTORNEY HUDSON: Objection.	14:03:46
17	A That's not what I said.	14:03:47
18	Q And has Justin ever used the term "sexy"	14:03:48
19	or "hot" where it made you feel uncomfortable?	14:03:53
20	A Yes.	14:03:55
21	Q Okay. When was that?	14:03:56
22	A Late May of 2023.	14:03:57
23	Q And where were you located?	14:03:59
24	A The bar set.	14:04:09
25	Q That was part of the filming of the -- of	14:04:12

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Transcript of Blake Lively
Conducted on July 31, 2025

101

1	the movie?	14:04:18
2	A The bar was a set for the film. It was a	14:04:19
3	real bar, but it was used as a location in the	14:04:27
4	movie.	14:04:30
5	Q And do you recall what time of day that	14:04:31
6	was?	14:04:35
7	A It was early in the day.	14:04:36
8	Q And where were you standing when he made	14:04:39
9	these comments?	14:04:49
10	A In the bar set?	14:04:50
11	Q Yes.	14:04:53
12	You were standing in the bar set? Any	14:04:55
13	more description you can give me about where in	14:04:58
14	the bar -- in the bar you were standing?	14:05:00
15	A There was a table that we were all acting	14:05:05
16	around that was probably in the middle of the bar.	14:05:10
17	But we hadn't begun the scene yet, so we were in	14:05:16
18	the midst of the bar set.	14:05:22
19	Q And what happened specifically?	14:05:24
20	A With what?	14:05:29
21	Q With him using the terms "sexy" or "hot"?	14:05:31
22	A He asked me to remove a coat that I was	14:05:36
23	wearing, which was a wardrobe coat, which was a	14:05:40
24	part of the look that had been photographed and	14:05:47
25	shared for that scene. And when I arrived to set,	14:05:55

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Transcript of Blake Lively
Conducted on July 31, 2025

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1	he asked me once I was on set amongst others -- I	14:06:02
2	remember once again Jenny Slate standing there --	14:06:10
3	and he said, "Can you take off your coat?"	14:06:15
4	And I thought that it was a more	14:06:22
5	interesting outfit to wear the coat. I thought it	14:06:24
6	was more eclectic and dynamic. And he said,	14:06:26
7	"Well, we want to see it without the coat."	14:06:34
8	So I took the coat off, and under the	14:06:38
9	coat, I was wearing a onesie that was zipped low	14:06:41
10	with a lace bra peeking out, because the scene	14:06:48
11	after this is a sex scene or a hookup scene,	14:06:53
12	rather. And he asked me to take off the coat.	14:06:57
13	And I'm standing amongst many cast and crew and	14:07:03
14	extras, and I felt on display. And he said, "I	14:07:10
15	think you look sexy."	14:07:17
16	And I said, "That's not what I'm going	14:07:18
17	for."	14:07:22
18	And he said, "Oh, I'm sorry. Hot?"	14:07:23
19	And I said, "Not that either."	14:07:27
20	And then he said, "Ah, well, I guess I	14:07:29
21	missed the HR meeting."	14:07:32
22	And became -- looked at me. I remember	14:07:34
23	him being aware of Jenny Slate and getting a	14:07:38
24	little huffy and walked off. And I performed the	14:07:42
25	scene without the coat.	14:07:51

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Transcript of Blake Lively

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1	Q When you say -- used the term "huffy," was	14:07:55
2	he getting huffy or you were getting huffy?	14:07:58
3	A It felt like he was.	14:08:01
4	Q And you said that one of you walked off?	14:08:02
5	A He did.	14:08:07
6	Q Were other people wearing onesies at that	14:08:08
7	time in that scene?	14:08:19
8	A Yes.	14:08:20
9	Q Who else was wearing onesies in that	14:08:22
10	scene?	14:08:32
11	A The characters I recall were -- Justin	14:08:32
12	Baldoni was wearing it for his character. Jenny	14:08:35
13	Slate was wearing it for her character. And	14:08:39
14	Hasan Minhaj was wearing it for his.	14:08:44
15	Q Did you ever have a conversation with	14:08:48
16	Justin about that incident?	14:09:04
17	A Yes.	14:09:08
18	Q When did you have a conversation with him	14:09:09
19	about it?	14:09:11
20	A My recollection is there was more than one	14:09:12
21	occasion.	14:09:22
22	Q Do you recall the first one after the	14:09:22
23	actual event?	14:09:26
24	A Yes.	14:09:29
25	Q Where did that take place?	14:09:30

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Transcript of Blake Lively

Conducted on July 31, 2025

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1	A	On the set.	14:09:33
2	Q	And did you initiate that conversation or	14:09:34
3		did he?	14:09:38
4	A	He -- he did.	14:09:39
5	Q	What did he say?	14:09:45
6	A	He attempted to excuse and justify and	14:09:47
7		backpedal. He said that -- he acknowledged that	14:10:08
8		he -- I don't know the exact words, but that he,	14:10:19
9		you know, is someone who makes mistakes.	14:10:25
10		And he wasn't making points that I felt	14:10:30
11		were coherent. I didn't understand quite what he	14:10:35
12		was saying, and I don't believe Jenny did either.	14:10:39
13		She then jumped in to talk about dynamics	14:10:45
14		on a set and how uncomfortable it can be when you	14:10:54
15		are getting unwarranted comments. And I -- he	14:10:57
16		never asked me if I was okay. He never told me	14:11:10
17		that that was inappropriate that he personalized	14:11:18
18		those comments, and that it would never happen	14:11:22
19		again, and that he understood the mistake that had	14:11:24
20		been made and acknowledged that -- what had	14:11:27
21		happened.	14:11:32
22		And I never felt reassurance that he	14:11:34
23		understood to tell me that he wouldn't put me in	14:11:38
24		that situation again. I understood that he knew	14:11:49
25		he had made a mistake, but it felt like he was	14:11:52

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Transcript of Blake Lively
Conducted on July 31, 2025

105

1	trying to get me on board with understanding why	14:11:57
2	that was okay.	14:12:02
3	Q What did he say that gave you the	14:12:03
4	indication that he was trying to get you on board	14:12:07
5	with -- with this being okay?	14:12:10
6	A Like I said, I don't remember the specific	14:12:12
7	words he said because he wasn't really making a	14:12:15
8	lot of coherent points. He had been in a -- what	14:12:20
9	felt like a retaliatory mood since I said to him,	14:12:26
10	"That's not what I'm going for," and "Not that	14:12:31
11	either."	14:12:35
12	That was something that I knew of him when	14:12:40
13	I expressed a boundary, that behavior. And I was	14:12:42
14	always very uncomfortable afterwards because I	14:12:47
15	knew that I had to be in scenes and maintain some	14:12:49
16	level of chemistry and camaraderie with this	14:12:55
17	person.	14:13:00
18	So it was a very -- those were all very	14:13:00
19	unsettling moments where there was a lot coming	14:13:06
20	up.	14:13:09
21	Q Did he ever say, when you spoke to him	14:13:13
22	about it, that -- did he ever ask you whether he	14:13:16
23	had crossed the line?	14:13:21
24	A I think I made it pretty clear he had	14:13:23
25	crossed the line.	14:13:25

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Transcript of Blake Lively
Conducted on July 31, 2025

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1	Q Did he ever say, though, "Did I cross the	14:13:26
2	line?" Did he ever ask you?	14:13:29
3	ATTORNEY HUDSON: Objection.	14:13:33
4	A I believed him to have an understanding	14:13:38
5	that he crossed the line from his behavior.	14:13:39
6	Q And I understand that you have that	14:13:44
7	understanding, but as you sit here today, you	14:13:46
8	don't recall whether or not he said -- he asked	14:13:47
9	you whether he crossed the line; is that correct?	14:13:52
10	A I think it was very obvious that I felt he	14:13:54
11	had crossed the line. I can't tell you what's in	14:13:59
12	his head, but I can tell you that I was quite	14:14:04
13	clear.	14:14:07
14	Q Right. I'm just asking for your	14:14:08
15	recollection of what he said right now. And so if	14:14:10
16	you recall, great. If you don't, that's okay too.	14:14:14
17	But did he -- do you recall him asking you	14:14:16
18	if he had crossed the line?	14:14:19
19	A I don't recall him asking me anything. I	14:14:21
20	recall him speaking at me.	14:14:27
21	Q Okay. Was this incident on the same day	14:14:29
22	that he complimented your outfit or was this a	14:14:36
23	different day?	14:14:40
24	A It was.	14:14:41
25	Q The same day?	14:14:42

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1 So we had talked about what you were 14:22:15
2 wearing, your personal clothes earlier. And now 14:22:17
3 you -- you know, you say that Justin said "hot" 14:22:21
4 and "sexy." And I'm trying to find out what you 14:22:24
5 were wearing when he said that. 14:22:28

6 ATTORNEY HUDSON: Objection. 14:22:30

7 A When he said that, it was after he asked 14:22:31
8 me to remove the coat, the wardrobe coat from over 14:22:33
9 top of the onesie that I was wearing. So at that 14:22:38
10 point, I was wearing a onesie that was zipped low 14:22:41
11 with a burgundy lace bra peeping out. 14:22:46

12 Q And what were you wearing that was part of 14:22:52
13 the wardrobe for the scene? 14:22:55

14 A That. 14:22:56

15 Q What about the coat? 14:22:58

16 A Yes, the coat was also wardrobe for the 14:22:59
17 scene. 14:23:02

18 Q Had the coat been approved in advance? 14:23:04

19 A That was my understanding. 14:23:07

20 Q By whom? 14:23:08

21 ATTORNEY HUDSON: Objection. 14:23:16

22 A I don't know who made approvals, but when 14:23:17
23 you do a fitting, you take photos for any of the 14:23:19
24 decision makers to approve. And if there is an 14:23:22
25 issue, the wardrobe designer will come to you and 14:23:26

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Transcript of Blake Lively

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1	A	The time in which he told me I looked sexy	14:27:42
2		and I looked hot, yes, I am claiming that.	14:27:48
3	Q	Any other time?	14:27:51
4	A	That he told me I looked sexy that I'm	14:27:54
5		claiming?	14:27:58
6	Q	Yes.	14:27:59
7	A	Not me specifically, no.	14:27:59
8	Q	Were you uncomfortable or felt like you	14:28:01
9		were harassed as a result of hugging and touching?	14:28:13
10	ATTORNEY HUDSON:	Objection.	14:28:17
11	A	The first time, no.	14:28:17
12	Q	When was the first time?	14:28:28
13	A	Well, there were a lot of hugs.	14:28:29
14	Q	Do you recall the first time?	14:28:43
15	A	No.	14:28:46
16	Q	Okay.	14:28:49
17	A	I recall the first time on set, the first	14:28:50
18		day on set.	14:28:54
19	Q	And are you alleging that you felt	14:28:56
20		uncomfortable or sexually harassed as a result of	14:28:59
21		hugging on the set?	14:29:06
22	ATTORNEY HUDSON:	Objection.	14:29:09
23	A	There is more context.	14:29:11
24	Q	Go ahead.	14:29:15
25	A	The first day on set, there were a lot of	14:29:18

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1 hugs. And I made an announcement. I said, okay,
2 great. We all hugged each other. We all liked
3 each other. We're all happy to be here. Let's
4 not do that every day. Like, we got it. We're
5 all happy to be here. Let's do our work.

14:29:25

14:29:35

14:29:38

14:29:41

14:29:44

6 And the rest of the crew, to my
7 recollection, didn't insist upon it. It was -- if
8 there was an organic moment, they may hug each
9 other, I'm not sure.

14:29:47

14:29:53

14:30:04

14:30:10

10 But the difference with Justin and Jamey
11 is that they would come for the hug every day.
12 And if you didn't hug them, they would become
13 prickly and standoffish and shut down.

14:30:12

14:30:17

14:30:22

14:30:27

14 So my issue with the hugging and touching
15 is when a boundary is expressed and the boundary
16 is not respected, or when the boundary affects the
17 work because of the person's reaction to receiving
18 a boundary, physical boundary.

14:30:37

14:30:40

14:30:47

14:30:55

14:31:00

19 Q And do you recall specifically any
20 instances where you didn't provide a hug to Justin
21 and/or Jamey and you felt like you were somehow
22 punished or responded to in a negative way?

14:31:03

14:31:08

14:31:15

14:31:20

23 A I often tried to busy myself so that I
24 didn't have to give hugs. Sometimes it was easier
25 just to do it and get it over with so that the

14:31:23

14:31:29

14:31:35

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1 work wouldn't be affected, because I found Justin 14:31:41
2 would be less collaborative. 14:31:46

3 And so -- I remember on a flower shop day, 14:31:52
4 he was attempting to give a hug, and I really, 14:32:01
5 really didn't want to be touched or be forced to 14:32:06
6 touch him. And so I was viewing the shop in awe 14:32:10
7 -- and the shop was amazing -- but I really busied 14:32:16
8 myself with remarking on the production design and 14:32:21
9 every detail so that I could avoid having to hug 14:32:25
10 him. 14:32:29

11 And he, you know, followed along behind 14:32:29
12 me, and that was always -- felt like it was always 14:32:32
13 expected that we do that. 14:32:37

14 Q And how many times did you not hug Justin 14:32:39
15 and he responded negatively? 14:32:55

16 A My recollection is that every time I 14:33:00
17 didn't hug him, he would shut down. 14:33:03

18 Q Was that every day? 14:33:09

19 A No. There were some days where it was 14:33:10
20 easier just to hug him. 14:33:13

21 Q But every day that you didn't hug him, 14:33:15
22 your testimony is that he would shut down? 14:33:18

23 A My recollection is that he would become 14:33:21
24 prickly, yes. 14:33:26

25 Q And what do you mean by "prickly"? 14:33:27

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Transcript of Blake Lively
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1	A I mean, there -- the warmth and -- his	14:33:31
2	warmth felt tied to physical affection. And while	14:33:50
3	that's something I can understand in a personal	14:33:54
4	setting, in a work setting, it was really hard.	14:34:00
5	Q Have you ever used the word "sexy" or	14:34:04
6	"hot" with Justin referring to yourself?	14:34:06
7	A To myself?	14:34:10
8	Q Yes.	14:34:12
9	A Not to my recollection, to me personally.	14:34:14
10	Q Have you ever used the word "sexy" or	14:34:19
11	"hot" with Justin to refer to something you were	14:34:22
12	wearing or that you proposed to wear in the film?	14:34:24
13	A In the context of the film, in the	14:34:27
14	creative context, yeah, I would use the word	14:34:32
15	"sexy."	14:34:37
16	Q More than once?	14:34:37
17	A I don't recall, but I would imagine so.	14:34:39
18	Q And what about "hot," did you use that	14:34:46
19	term in connection with filming?	14:34:50
20	ATTORNEY HUDSON: Objection.	14:34:53
21	A I don't recall.	14:34:55
22	Q You might have or you might have not; you	14:34:56
23	just don't recall?	14:35:00
24	ATTORNEY HUDSON: Objection.	14:35:00
25	A I don't recall. But only in the context	14:35:01

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1	A Yes.	14:38:05
2	Q Can you explain who walked into your	14:38:06
3	trailer uninvited while you were undressed or	14:38:11
4	breastfeeding?	14:38:14
5	A Jamey Heath.	14:38:14
6	Q Anyone else?	14:38:17
7	A I have a memory of my hairdresser locking	14:38:23
8	the door to hair and makeup because Jamey and	14:38:31
9	Justin would often pop by. So I know that that	14:38:37
10	was a consideration and an alteration we had to	14:38:43
11	make in the way that we worked. I had never	14:38:48
12	locked the trailer door consistently on a film	14:38:52
13	before.	14:38:55
14	Q Can you recall a specific time that either	14:38:55
15	Jamey or Justin walked into the trailer -- into	14:39:01
16	your trailer uninvited while you were undressed or	14:39:05
17	breastfeeding?	14:39:08
18	A Yes.	14:39:09
19	Q What do you recall?	14:39:09
20	A I recall Jamey Heath walking in or trying	14:39:12
21	to walk in and me telling him not to come in, and	14:39:21
22	him insisting on coming in anyway or the meeting	14:39:25
23	would be canceled.	14:39:27
24	Q When was that?	14:39:28
25	A Day two of production -- of filming.	14:39:31

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1	Q Did -- did you tell Jamey Heath that that	14:39:34
2	made you feel uncomfortable?	14:39:48
3	A I did.	14:39:50
4	Q What did you say to him?	14:39:54
5	A I recounted what had happened, and I told	14:39:55
6	him that that wasn't okay. And he said -- yeah, I	14:40:09
7	told him, you know, that I had told him to turn	14:40:16
8	around, and it's not okay to insist on that anyway	14:40:18
9	and that he could never do that again. And then I	14:40:23
10	told him to turn around and that he was looking	14:40:27
11	right at me. And he expressed that he liked to	14:40:29
12	make eye contact with people. He had a habit of	14:40:34
13	making eye contact with people when speaking with	14:40:37
14	them, so that's why that happened.	14:40:40
15	Q He was saying that why he went in there	14:40:43
16	was because he wanted to have eye contact with you	14:40:47
17	when speaking to people?	14:40:49
18	ATTORNEY HUDSON: Objection.	14:40:50
19	A No. He was saying that's why he looked --	14:40:51
20	Q That's --	14:40:55
21	A -- after I told him not to.	14:40:57
22	Q This is the second day of production,	14:40:58
23	correct?	14:41:02
24	A Yes.	14:41:02
25	Q And do you know what time of day it was	14:41:03

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Transcript of Blake Lively

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1	that he came into your trailer?	14:41:04
2	A Evening.	14:41:06
3	Q And was the trailer unlocked?	14:41:07
4	A I don't know if it was unlocked at that	14:41:12
5	point. He attempted to come in and we stopped him	14:41:15
6	from coming in.	14:41:18
7	Q When you say "we," who are you referring	14:41:19
8	to?	14:41:21
9	A My hair and makeup artists.	14:41:21
10	Q Did you have your security there at the	14:41:23
11	time?	14:41:25
12	A In my trailer, no.	14:41:26
13	Q Outside your trailer?	14:41:28
14	A I don't know where they were standing at	14:41:31
15	that moment.	14:41:33
16	Q The name of your security person is Kevin,	14:41:33
17	correct?	14:41:36
18	ATTORNEY HUDSON: Objection.	14:41:36
19	A We have different people who rotate.	14:41:37
20	Q But is there -- was there always	14:41:39
21	someone -- a security person outside your trailer?	14:41:42
22	ATTORNEY HUDSON: Objection.	14:41:45
23	A Not necessarily stationed right outside of	14:41:46
24	the hair and makeup door. They patrol.	14:41:50
25	Q Do you know -- as you sit here today, do	14:41:53

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1	you recall that specific second day of production,	14:41:56
2	whether or not there was a security person outside	14:42:00
3	your trailer?	14:42:01
4	ATTORNEY HUDSON: Objection.	14:42:03
5	A I don't recall, no. I was inside the	14:42:05
6	trailer, so I wouldn't have seen who was standing	14:42:09
7	there.	14:42:12
8	Q Did you ever call out for security or ask	14:42:12
9	for security to come in and take Jamey away?	14:42:16
10	ATTORNEY HUDSON: Objection.	14:42:19
11	A No.	14:42:24
12	Q And how long was Jamey in your trailer	14:42:24
13	for?	14:42:26
14	A I don't know exactly, but I would say	14:42:32
15	around five minutes.	14:42:34
16	Q And what was discussed during the five	14:42:36
17	minutes that he was in your trailer?	14:42:39
18	A We were meant to have a production meeting	14:42:45
19	that night, and I -- he came to my trailer as I	14:42:47
20	was -- we were going to have a production meeting	14:42:58
21	in my trailer. And he came to the hair and makeup	14:43:00
22	trailer as I was getting my body makeup removed	14:43:03
23	and my wig off and -- so that I could wrap out	14:43:06
24	hair and makeup and then I could then go into the	14:43:11
25	-- my own trailer and I have a meeting with them.	14:43:16

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Transcript of Blake Lively

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1	He unexpectedly came to my trailer,	14:43:18
2	knocked on the door, said, "We've got to talk."	14:43:21
3	I said, "We can't talk right now. I'll be	14:43:24
4	there in a few minutes. I'm getting done as fast	14:43:27
5	as I can so we can have this meeting."	14:43:29
6	He said, "Oh, no, we've got to talk	14:43:29
7	now" --	14:43:33
8	(Reporter clarification.)	14:43:33
9	THE WITNESS: From where?	14:43:37
10	(Reporter clarification.)	14:43:44
11	A I said, "I'll meet you in there in a	14:43:44
12	minute. I'm getting -- I'm undressed. I'm	14:43:48
13	getting ready for the meeting. I'll be there in	14:43:50
14	just a minute."	14:43:52
15	And he said, "If we don't meet now, we	14:43:53
16	can't do that meeting."	14:43:55
17	And that meeting was very important to me	14:43:56
18	because it was to discuss other behavior I had	14:44:00
19	experienced earlier that day that was concerning	14:44:03
20	to me.	14:44:06
21	So I said, "Okay, fine, you can come in."	14:44:09
22	And he came in and I said, "Okay, you can	14:44:12
23	come in, but please don't look. Can you turn	14:44:15
24	around?"	14:44:18
25	So he turned around and he faced the wall.	14:44:18

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Transcript of Blake Lively

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1 And I was in front of the hair and makeup mirror 14:44:21
2 as my team was working -- they call it 14:44:26
3 double-teaming when they're both working at the 14:44:29
4 same time to either get you ready or disassemble 14:44:32
5 you. 14:44:34

6 And I was helping as well so that we could 14:44:35
7 work quickly. And Jamey said that the meeting had 14:44:40
8 to happen on my time, the meeting we were about to 14:44:44
9 have; that it -- because of my turnaround, which 14:44:49
10 is the time -- from the time that I am done with 14:44:55
11 work until the time I start again, my turnaround 14:44:57
12 was 12 hours. 14:45:00

13 And he said, "This meeting has to be on 14:45:01
14 your clock. We don't have time for this." 14:45:03

15 And I said, "This isn't a personal 14:45:05
16 meeting. This is a production meeting to discuss 14:45:08
17 how to make the set better and smoother." 14:45:10

18 And he was arguing for it to be I on my 14:45:19
19 personal time. And I said, "My personal time is 14:45:22
20 important to me because I have a newborn baby. 14:45:24
21 When I go home I prepare for the next day. I feed 14:45:27
22 my baby. I work out. I have a lot of 14:45:30
23 responsibilities. I really need my time, and this 14:45:32
24 is not a personal meeting; it's a production 14:45:35
25 meeting." 14:45:37

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Transcript of Blake Lively

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1 And as I'm having this negotiation with 14:45:38
2 him, I turn to him and he's staring straight at 14:45:40
3 me. He's no longer facing the wall. He's staring 14:45:46
4 straight at me. 14:45:49

5 And I said, "Jamey, what are you doing? 14:45:50
6 You said you would turn around." 14:45:54

7 "Oh, oh, sorry. I like to make eye 14:45:55
8 contact with people when I talk to them." 14:45:57

9 And I said, "You need to leave." 14:45:59

10 And so he left the trailer. And I 14:46:01
11 finished -- I finished getting ready. I was 14:46:04
12 incredibly shaken. My memory is my hair and 14:46:12
13 makeup -- the women who did my hair and makeup 14:46:18
14 were shaken as well. 14:46:24

15 And then I finished doing my work and I 14:46:28
16 went in and I took the meeting. 14:46:32

17 Q When you said he was looking at you, was 14:46:33
18 he looking in your eyes or somewhere else? 14:46:42

19 A Well, when I turned, he was fully facing 14:46:43
20 me and I was topless. So I don't know all of the 14:46:46
21 contours of my body that his eyes were on. 14:46:52

22 Q Okay. And when you were topless, did you 14:46:54
23 have body makeup on? 14:46:57

24 A Yes. 14:46:58

25 Q And as you sit here today, you don't 14:46:59

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Transcript of Blake Lively

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1	remember where on your body or your eyes that he	14:47:05
2	was looking at that time; is that correct?	14:47:08
3	ATTORNEY HUDSON: Objection.	14:47:10
4	A I remember turning around and he was	14:47:11
5	facing me, topless, when I said, "The only way you	14:47:14
6	can come in is if you turn around and face that	14:47:17
7	wall."	14:47:19
8	And he was faced the exact opposite	14:47:20
9	direction, facing me.	14:47:23
10	Q Right. I'm just trying to find out, like,	14:47:25
11	where his eyes were at the time that you turned	14:47:26
12	around.	14:47:28
13	Were his eyes at your eyes looking at you?	14:47:29
14	ATTORNEY HUDSON: Objection.	14:47:32
15	A Where his eyes were, I remember feeling	14:47:34
16	like he was looking at my body. So that's my	14:47:36
17	memory.	14:47:41
18	Q Okay. And when you say you remember	14:47:41
19	feeling like he was looking at your body, you	14:47:46
20	don't have a recollection that he actually was	14:47:48
21	looking at your body, but it felt like that; is	14:47:50
22	that correct?	14:47:52
23	A Yeah, I mean, the guy was -- the only way	14:47:53
24	he could come in the trailer, which I wasn't	14:47:58
25	comfortable with in the first place, is if he was	14:48:00

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1	facing the wall. Then I turn around and he's	14:48:03
2	facing me, topless.	14:48:05
3	Q Okay. One of the other things in your	14:48:10
4	complaint talks about "drafting a graphic orgasm	14:48:19
5	scene."	14:48:22
6	Do you recall that?	14:48:25
7	A If I recall what?	14:48:26
8	Q That there was a -- some sort of or --	14:48:27
9	orgasm scene, a graphic orgasm scene that was	14:48:30
10	drafted that bothered you or you felt you were	14:48:35
11	harassed by?	14:48:39
12	ATTORNEY HUDSON: Objection.	14:48:40
13	A It wasn't that there was that scene in the	14:48:41
14	movie; it was the experience surrounding it that	14:48:44
15	felt upsetting.	14:48:50
16	Q What experience was there around that	14:48:53
17	scene?	14:48:57
18	A When I expressed my discomfort with the	14:48:57
19	fact that the scenes had become more gratuitous	14:49:09
20	and they felt in somewhat cases -- in some cases	14:49:16
21	somewhat pornographic to me, Justin Baldoni,	14:49:22
22	instead of speaking as a filmmaker about the	14:49:29
23	characters, attempted to, what I felt, convince me	14:49:33
24	to do the scenes by giving me personal reasons as	14:49:40
25	to why those scenes existed.	14:49:43

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Transcript of Blake Lively
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1	Q And what did he say?	14:49:47
2	A To which one?	14:49:51
3	Q To why those scenes existed, any one.	14:49:56
4	A The characters climaxing at the same time,	14:50:01
5	he told me that he and his wife orgasm at the same	14:50:13
6	time and asked me if my husband and I do the same.	14:50:21
7	When I said that the scenes felt	14:50:25
8	pornographic, he said -- he shared with me that	14:50:30
9	he, as he put it, had been previously addicted to	14:50:36
10	pornography, and so he understood it very well.	14:50:42
11	And that the scenes were not in fact pornographic,	14:50:46
12	but instead they were told through the female gaze	14:50:49
13	because this is what women wanted to see; that	14:50:52
14	women often see -- that women want to see	14:50:55
15	themselves being pleasured on camera.	14:51:06
16	There was a scene that he was proposing in	14:51:11
17	which he brings the character -- his character	14:51:13
18	Ryle brings the character Lily to orgasm on	14:51:19
19	camera, and I felt like I would be mortified to	14:51:23
20	shoot something like that at this stage in my life	14:51:30
21	and career and being the mother of four kids, and	14:51:32
22	given that that was not in the understanding of	14:51:36
23	the script that I came into the film with.	14:51:39
24	He told me that those were some of his	14:51:45
25	most precious memories, and I don't remember the	14:51:48

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1 exact words he used, but between him and his wife 14:51:52
2 when he would bring her to orgasm. And she would 14:51:55
3 ask to then, I guess, do what needed to happen for 14:52:00
4 him, and he would say, no, that's enough. 14:52:06

5 That was -- 14:52:10

6 Q So was this in connection with the 14:52:11
7 creation of a scene? 14:52:13

8 ATTORNEY HUDSON: Objection. 14:52:16

9 A Was what in connection with the creation 14:52:17
10 of a scene? 14:52:20

11 Q This discussion about what -- how the sex 14:52:20
12 scene should go, was he discussing with you why he 14:52:24
13 felt like the sex scene should go one way versus 14:52:28
14 another? 14:52:34

15 A He was using personal experiences and 14:52:34
16 descriptives in a conversation that my intention 14:52:37
17 was to discuss the gratuitous sex that I felt 14:52:40
18 had -- I felt -- it was added, but I felt it was 14:52:47
19 gratuitous -- that had been added to the script. 14:52:50
20 And my intention was to have a creative discussion 14:52:52
21 about the sex scenes. And they made a surprising 14:52:54
22 and really disturbing departure into personal 14:52:58
23 conversations. 14:53:03

24 Q Where did that meeting take place? 14:53:09

25 A At my office. 14:53:10

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1	Q And what was the date of that meeting?	14:53:11
2	A I don't remember. April of 2023.	14:53:13
3	Q Was there any other occasion that Jamey	14:53:16
4	walked into your trailer uninvited while you were	14:53:24
5	undressing or breastfeeding?	14:53:31
6	A I remember them often, both them, being	14:53:35
7	Justin and Jamey, coming to my trailer to speak.	14:53:39
8	And when I was in my trailer, I was more often	14:53:46
9	than not, if I wasn't expecting visitors, I was	14:53:48
10	more often than not topless.	14:53:53
11	Q So -- and did you lock your door?	14:53:56
12	A I started locking my door, yeah.	14:54:01
13	Q So you testified about the second day of	14:54:03
14	production when Jamey came in.	14:54:07
15	What were the other days that either	14:54:11
16	Justin or Jamey came in uninvited?	14:54:12
17	A I don't remember specifically. I remember	14:54:17
18	they often wanted to meet while I was in my	14:54:19
19	trailer.	14:54:22
20	Q And while they often wanted to meet while	14:54:23
21	you were in your trailer, did they actually go	14:54:26
22	into your trailer without your permission while	14:54:29
23	you were undressed or breastfeeding?	14:54:30
24	A I don't remember how many times that	14:54:38
25	happened. I do remember that I began to adjust	14:54:44

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1	the work to anticipate that. So I had a robe at	14:54:50
2	the ready. And there were ways in which I could	14:54:55
3	still meet with them, if needed, in my trailer in	14:54:57
4	a way where I was able to be covered.	14:55:03
5	Q Did you ever invite Jamey or Justin into	14:55:07
6	your trailer while you were breastfeeding?	14:55:11
7	A I don't recall if I invited them in, but I	14:55:18
8	would breastfeed while working as long as I felt	14:55:25
9	comfortable and covered in a way where I felt like	14:55:31
10	I could offer that consent.	14:55:35
11	Q Did you ever actually put anything in	14:55:37
12	writing where you invited Justin or Jamey into	14:55:41
13	your trailer while you were breastfeeding to go	14:55:45
14	over lines?	14:55:48
15	A While I was breastfeeding, no, not that I	14:55:50
16	recall.	14:55:53
17	Q What about while you were pumping?	14:55:53
18	A I think you're referencing a specific	14:55:55
19	text, and I don't know if I was pumping at the	14:56:07
20	time that he entered the trailer. My recollection	14:56:15
21	is sharing what I was doing. It wasn't an	14:56:19
22	immediate invitation.	14:56:24
23	Q It wasn't an immediate invitation, meaning	14:56:26
24	he should come in later, is that what you meant?	14:56:30
25	A No, I'm saying it wasn't explicit. But I	14:56:33

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1	would breastfeed and pump while working as long as	14:56:35
2	I felt that I was covered and was able to offer	14:56:40
3	consent to do it in a way where I was comfortable.	14:56:45
4	Q And as you sit here today, are you sure	14:56:50
5	that -- actually, strike that.	14:56:54
6	Did other people from the cast and crew go	14:56:58
7	into your trailer while you were breastfeeding?	14:57:02
8	ATTORNEY HUDSON: Objection.	14:57:08
9	A Nobody insisted on entering when I asked	14:57:08
10	them not to, other than the circumstances I've	14:57:14
11	told you.	14:57:20
12	Q Did you ever tell Jamey or Justin that you	14:57:21
13	had never seen pornography before?	14:57:36
14	A Yes. In an attempt to change the subject	14:57:42
15	when Justin mentioned his pornography addiction, I	14:57:48
16	said that as a deflection, because I couldn't	14:57:55
17	relate. I didn't understand enough about it.	14:57:58
18	Q Would it surprise you to learn that Justin	14:58:00
19	did not ever have a pornography addiction?	14:58:04
20	A It would surprise me to learn that because	14:58:07
21	he told me he did.	14:58:10
22	Q When he told you that he did, did you say,	14:58:12
23	"Stop, I don't want to hear this," or anything	14:58:16
24	like that?	14:58:20
25	A By saying, "I've never seen it" and	14:58:20

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1 shutting down the conversation, that's how I told 14:58:26
2 him to stop. 14:58:30

3 Q So the actual words that you used -- that 14:58:31
4 you used was saying, "I've never seen it"; is that 14:58:34
5 right? 14:58:37

6 A Well, his attempt was to explain 14:58:37
7 pornography and what that was and how what I felt 14:58:41
8 to be pornographic wasn't in fact pornographic. 14:58:48
9 And that he was expressing his expertise on it 14:58:53
10 given his previous addiction. 14:59:01

11 And in an effort to no longer be talking 14:59:04
12 about pornography, because I was never trying to 14:59:07
13 talk about pornography, I said the scenes felt 14:59:09
14 pornographic, and I wasn't opening a door to 14:59:14
15 discuss pornography or anyone's past with it, I 14:59:16
16 attempted to shut it down and change the subject. 14:59:21

17 Q And did you ever tell Justin, "Don't talk 14:59:24
18 about pornography to me anymore"? 14:59:31

19 A That's what I felt like I expressed. 14:59:32

20 Q And you expressed that by using the words, 14:59:36
21 "I've never seen it"? 14:59:39

22 ATTORNEY HUDSON: Objection. 14:59:40

23 A I said, "I've never seen pornography. I 14:59:40
24 don't know anything about it." 14:59:43

25 Q Prior to saying that to Justin, had you 14:59:45

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1	Q Sure.	15:01:15
2	Are you claiming that as part of your	15:01:15
3	lawsuit, that it was sexual harassment that either	15:01:17
4	Justin or Jamey disclosed to the cast and crew	15:01:20
5	that you never looked at pornography?	15:01:25
6	ATTORNEY HUDSON: Objection.	15:01:27
7	A I felt upset and disturbed and exposed	15:01:28
8	that an effort at deflecting something that he had	15:01:37
9	said that felt like it had crossed a line, instead	15:01:42
10	of him taking that and not doing it anymore, that	15:01:49
11	he took that and used that in front of other crew	15:01:53
12	members in the workplace.	15:02:00
13	Q And is this just Justin or Jamey also?	15:02:02
14	A Jamey was always around Justin. They were	15:02:05
15	a pair. So my memory of them together on set and	15:02:10
16	that was them together.	15:02:20
17	Q Did you actually overhear Justin or Jamey	15:02:21
18	tell crew members or cast members that you never	15:02:25
19	looked at pornography?	15:02:32
20	A Yes, I remember hearing that.	15:02:36
21	Q You heard it from them directly?	15:02:39
22	A I remember hearing from that from Justin,	15:02:41
23	yes.	15:02:45
24	Q And Justin said that in front of you?	15:02:46
25	A Yes.	15:02:49

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1	Q And who did he tell?	15:02:49
2	A I don't remember specifically. I remember	15:02:51
3	him speaking about pornography in a casual way.	15:03:01
4	And he said, "Oh, Blake doesn't know anything	15:03:13
5	about it; she's never seen it."	15:03:20
6	Q When was this? What date?	15:03:22
7	A I don't remember what date.	15:03:24
8	Q Do you remember the month?	15:03:25
9	A It would have been in May of 2023.	15:03:26
10	Q Did you bring this up with Ange?	15:03:28
11	A I don't remember if I made it to that.	15:03:34
12	Q Did you bring it up with anybody at Sony?	15:03:40
13	A Eventually, yes.	15:03:43
14	Q In May or June, did you bring it up to	15:03:47
15	them?	15:03:51
16	A No. I don't know if I made it to that.	15:03:52
17	Like I said, Ange shut me down quickly, telling me	15:03:55
18	I couldn't file an HR claim through her, through	15:03:59
19	Sony.	15:04:03
20	Q Who was the -- who was there when Justin	15:04:03
21	was saying that you had never seen pornography?	15:04:12
22	Who in the cast or crew were present for that?	15:04:18
23	ATTORNEY HUDSON: Objection.	15:04:20
24	A I don't remember specifically. I remember	15:04:23
25	the feeling more than I remember the specifics.	15:04:31

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1	BY ATTORNEY FREEDMAN:	15:35:50
2	Q Do you believe that certain of the	15:35:50
3	defendants deployed bots in an attempt to harm	15:35:52
4	your reputation?	15:36:00
5	ATTORNEY HUDSON: Objection.	15:36:01
6	A I believed that they deployed a social	15:36:02
7	plan to harm my reputation, yes.	15:36:20
8	Q Do you believe that -- have you ever told	15:36:22
9	anybody that the -- any of the defendants have	15:36:28
10	used bots?	15:36:31
11	A I felt like they did, yes.	15:36:33
12	Q My question is, have you told anyone that	15:36:38
13	they did?	15:36:42
14	A Yes.	15:36:42
15	Q Who have you told that the defendants	15:36:43
16	employed bots?	15:36:46
17	A I don't recall specifically who I -- who	15:36:48
18	all I said that to.	15:37:05
19	Q Did you ever put it in writing anywhere	15:37:06
20	that any of the defendants were deploying bots to	15:37:08
21	harm your reputation?	15:37:12
22	A I believe so, yes.	15:37:14
23	Q Where did you put it in writing?	15:37:16
24	Who did you send that to?	15:37:18
25	ATTORNEY HUDSON: Objection. Compound.	15:37:19

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1	A I believe I sent text messages to friends	15:37:21
2	and loved ones.	15:37:25
3	Q And what is your -- which of the	15:37:26
4	defendants used bots to harm your reputation?	15:37:32
5	ATTORNEY HUDSON: Objection.	15:37:36
6	A Can you be more specific?	15:37:39
7	Q Sure.	15:37:40
8	You understand who the defendants are who	15:37:42
9	you're suing here?	15:37:44
10	A Is that a question?	15:37:48
11	Q Yes.	15:37:49
12	A Yes, I do.	15:37:50
13	Q Which one of those individuals were	15:37:51
14	engaged in using bots --	15:37:52
15	ATTORNEY HUDSON: Objection --	15:37:59
16	Q -- to harm your reputation?	15:38:00
17	ATTORNEY HUDSON: Objection.	15:38:01
18	A My understanding is that they worked	15:38:03
19	together.	15:38:05
20	Q So you believe that every one of the	15:38:08
21	defendants were involved in using bots to harm	15:38:09
22	your reputation?	15:38:12
23	ATTORNEY HUDSON: Objection.	15:38:13
24	Q Is that correct?	15:38:14
25	A I believe that the defendants worked	15:38:14

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1	together to harm my reputation digitally.	15:38:22
2	Q Do you believe they used bots to do so?	15:38:25
3	ATTORNEY HUDSON: Objection.	15:38:28
4	A I'm not sure if they used bots.	15:38:30
5	Q Was there a point in time when you were	15:38:35
6	sure that they used bots to harm your reputation?	15:38:39
7	A I believe they did, yeah.	15:38:43
8	Q Why did you believe that?	15:38:47
9	A Because of the experience that I was	15:38:49
10	having and because others felt the same.	15:39:02
11	Q What experience were you having?	15:39:09
12	A Harassment.	15:39:14
13	Q What do you mean by that?	15:39:15
14	A I mean digital harassment.	15:39:20
15	Q And do you mean by that, negative stories	15:39:27
16	that came out about you?	15:39:29
17	ATTORNEY HUDSON: Objection.	15:39:30
18	A Negative stories are an element of what I	15:39:35
19	was experiencing at the time.	15:39:38
20	Q And which of the defendants were involved	15:39:39
21	in helping to put out negative articles about you?	15:39:45
22	ATTORNEY HUDSON: Objection.	15:39:53
23	A I am not any of the defendants, so I can't	15:39:55
24	speak to them.	15:40:04
25	Q What did Melissa Nathan do to put out	15:40:05

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1	A	Can you be more specific?	15:41:23
2	Q	Sure.	15:41:24
3		Did Leslie Sloane call you and tell you	15:41:25
4		that she received information from Stephanie Jones	15:41:29
5		about a smear campaign or something similar to	15:41:38
6		that?	15:41:39
7	A	She did not.	15:41:39
8	Q	Did you learn from Leslie Sloane that	15:41:40
9		there were text messages in Jen Abel's phone?	15:41:46
10	A	No.	15:41:51
11	Q	Who did you learn that from?	15:41:52
12	A	Ashley Avignon.	15:41:53
13	Q	Who is that?	15:41:56
14	A	She's a friend of mine.	15:41:58
15	Q	And what did she tell you?	15:42:00
16	A	She said that a woman that she knows named	15:42:04
17		Stephanie Jones was trying to get in touch with	15:42:13
18		me. She gave me more details.	15:42:20
19	Q	When did she tell you that?	15:42:25
20	A	Late August of 2024.	15:42:27
21	Q	And did she tell you that in writing or on	15:42:32
22		the telephone?	15:42:37
23	A	On the phone.	15:42:38
24	Q	And what else did she tell you?	15:42:39
25	A	She told me that she works with a woman in	15:42:47

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1 a -- I think she's an interior designer and -- the 15:42:56
2 woman's name is Stephanie Jones -- and that she's 15:43:01
3 a publicist, and that she has a phone which 15:43:06
4 contains the most disturbing messages she's ever 15:43:12
5 read in her 20 to 30-plus-year career, that as a 15:43:18
6 mother and woman, she was sobbing reading the 15:43:26
7 messages. 15:43:28

8 That she thought that I deserved to see 15:43:31
9 what had been done to me. She said that she had 15:43:35
10 reached out to my publicist, Leslie Sloane, to 15:43:40
11 share the same, and was not -- and was brushed 15:43:47
12 off. But she said that she felt like I should see 15:43:59
13 these messages and that they were on a phone that 15:44:04
14 she had ownership of because it was a company 15:44:08
15 phone. 15:44:14

16 Q Stephanie -- did you speak with Stephanie 15:44:14
17 Jones? 15:44:16

18 A No. This was relayed to me through 15:44:16
19 Ashley. 15:44:20

20 Q And did you get a hold of those documents? 15:44:20

21 ATTORNEY HUDSON: Objection. 15:44:24

22 A Eventually, yes. 15:44:25

23 Q When was that? 15:44:28

24 A Fall of 2024. 15:44:29

25 Q When you say "fall," can you be more 15:44:32

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1	hired where there were text messages that said,	16:20:28
2	"There is nothing to do here. All the press	16:20:33
3	that's coming out is organically bad against Blake	16:20:36
4	Lively"?	16:20:43
5	ATTORNEY HUDSON: Objection.	16:20:44
6	Q Do you recall that?	16:20:45
7	A No.	16:20:46
8	Q Other than what you've testified to and	16:20:51
9	the attorney-client privileged stuff that you	16:20:54
10	can't testify to, do you have any other facts upon	16:20:56
11	which you base your belief that there was this	16:21:00
12	negative smear campaign? And when I say that, I'm	16:21:03
13	referring to digital, I'm referring to articles	16:21:08
14	and other forms of media.	16:21:11
15	ATTORNEY HUDSON: Objection.	16:21:15
16	A Outside of attorney-client privileged	16:21:16
17	conversations, I can refer back to the documents,	16:21:24
18	the Jonesworks documents, and also the experience	16:21:34
19	of being in this industry for over 20 years and	16:21:40
20	understanding the -- the cadence of news and	16:21:46
21	media. And my feelings about what happened	16:21:57
22	weren't just mine. I experienced this shock in	16:22:05
23	realtime alongside Sony, who had been studying the	16:22:10
24	marketing and social sentiment of the film and the	16:22:18
25	people in it the entire time, and they also felt	16:22:24

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1	this way.	16:22:27
2	Q Did you cause or suggest to the cast of It	16:22:28
3	Ends With Us to stop following Justin Baldoni on	16:22:34
4	social media?	16:22:36
5	ATTORNEY HUDSON: Objection.	16:22:37
6	A No.	16:22:38
7	Q Did you have any discussions with anybody	16:22:38
8	in the cast about that?	16:22:41
9	A Yes, a couple of us spoke about it.	16:22:43
10	Q And who did you speak with?	16:22:47
11	A Jenny Slate was very upset on the first	16:22:50
12	round of production, so she unfollowed him in May	16:22:57
13	or June of 2023. And before the film came out --	16:23:02
14	Jenny doesn't manage her social media. She has a	16:23:12
15	person do it for her. And she noticed that this	16:23:16
16	person had re-followed him. And she really wanted	16:23:22
17	these people out of her life, as she put it. I	16:23:29
18	don't know if those were the exact words.	16:23:32
19	And she was concerned about the tough	16:23:34
20	position we were all in, which is wanting to	16:23:46
21	protect the film and also wanting to respect her	16:23:51
22	own boundaries and dignity.	16:23:53
23	Q Who else did you have discussions with	16:23:57
24	about unfollowing Justin Baldoni?	16:24:00
25	A Colleen Hoover told me after she	16:24:02

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1	unfollowed him.	16:24:05
2	Q Anyone else?	16:24:07
3	A No.	16:24:10
4	Q Are you aware that Sony ever suggested	16:24:10
5	that you were the cause of people unfollowing	16:24:14
6	Justin?	16:24:17
7	ATTORNEY HUDSON: Objection.	16:24:17
8	A No.	16:24:18
9	Q Are you aware of Sony saying that it was	16:24:19
10	your doing that right before the premiere,	16:24:28
11	everybody stopped following Justin, which caused a	16:24:31
12	media interest in the dispute?	16:24:36
13	ATTORNEY HUDSON: Objection.	16:24:38
14	A Given that Sony is a corporate entity, can	16:24:39
15	you be more specific with who you're speaking	16:24:41
16	about?	16:24:42
17	Q Anyone at Sony.	16:24:44
18	A Anyone at Sony?	16:24:45
19	Q Yes.	16:24:46
20	A No, I'm not aware of that.	16:24:47
21	Q You've never seen a document or seen	16:24:48
22	anything that indicates in any way that Sony was	16:24:51
23	holding you responsible for the cast unfollowing	16:24:54
24	Justin; is that your testimony?	16:25:00
25	ATTORNEY HUDSON: Objection.	16:25:01

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1 another. And each day, key crew members were not
2 there, which is odd on a film set. There is not a
3 lot of substitution with key members. And I
4 noticed that a key member or two was missing. And
5 then the next day, there were more missing. And
6 then I noticed that I started to feel symptoms.
7 And I asked someone where the crew members were,
8 and I was told that they had COVID.

16:33:00

16:33:08

16:33:12

16:33:17

16:33:21

16:33:25

16:33:30

16:33:34

9 And I asked Alex Saks if she knew that.

16:33:37

10 And she said yes.

16:33:42

11 And I said, "Why didn't anyone let me
12 know?"

16:33:44

16:33:48

13 And she said, "Well, there aren't -- there
14 aren't necessarily COVID protocols that we have to
15 follow anymore."

16:33:48

16:33:55

16:33:59

16 And I said, "I understand, but I'm the
17 only person who can't wear a mask."

16:34:00

16:34:02

18 And if I knew that people were sick, per
19 SAG, I could ask for people to test when they
20 arrive at work. Just for the time period where
21 there is an outbreak, I could ask that others in
22 close proximity wear a mask. It's not something I
23 would have exercised usually because -- if there
24 wasn't an outbreak, because I wouldn't want to do
25 -- put additional burden on the budget or the

16:34:04

16:34:08

16:34:11

16:34:14

16:34:16

16:34:19

16:34:22

16:34:25

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1	time. So I had no reason to ask unless there was	16:34:28
2	an outbreak, but nobody told me there was an	16:34:33
3	outbreak.	16:34:35
4	So I said, "Why didn't anyone tell me?"	16:34:36
5	And she said, "Well, because we don't have	16:34:40
6	COVID insurance, is my understanding, so I don't	16:34:42
7	think they wanted you to test."	16:34:45
8	Q And did you verify that information with	16:34:46
9	anyone?	16:34:51
10	A I was told the next day that they did not	16:34:53
11	have COVID insurance, yes.	16:34:56
12	Q Who told you that?	16:34:59
13	A Alex Saks.	16:35:01
14	Q Did you request a meeting with Jamey,	16:35:05
15	Justin and Alex Saks on June 1, 2023?	16:35:11
16	A I don't remember the date, but I do	16:35:17
17	remember when I came back after having COVID, I	16:35:19
18	requested a meeting with them.	16:35:23
19	Q How did you request the meeting?	16:35:25
20	Was it by email or a phone call?	16:35:28
21	A I don't recall.	16:35:33
22	Q Was this an in-person meeting?	16:35:33
23	A Yes.	16:35:36
24	Q And this was the first day that production	16:35:36
25	began again after you got back from COVID, right?	16:35:41

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1	A Yes.	16:35:44
2	Q Was anyone else invited to attend that	16:35:44
3	meeting that didn't attend?	16:35:49
4	A Not that I recall.	16:35:52
5	Q What was discussed at the meeting on	16:35:54
6	June 1st?	16:35:58
7	A I wanted to check in with them about many	16:36:00
8	things. But upon starting the meeting, Justin	16:36:11
9	started to explain to me that Jamey showing -- I	16:36:28
10	hadn't mentioned this -- that Jamey showing the	16:36:33
11	nude video of his wife was okay, and that it	16:36:37
12	wasn't Jamey's fault. Justin said, "It's my	16:36:40
13	fault. I told him to show you because I thought	16:36:43
14	you wanted to see it. So it's not on Jamey it's	16:36:45
15	on me."	16:36:49
16	Which was so shocking to me because I had	16:36:52
17	a conversation with Ange a few days before saying	16:36:57
18	I wanted to file a formal HR complaint. She told	16:36:59
19	me I couldn't file a complaint through Sony, and	16:37:02
20	that I had to file it to the men who were making	16:37:08
21	me so uncomfortable.	16:37:10
22	And I asked her not to tell them so that I	16:37:15
23	could figure out how to deal with it properly with	16:37:17
24	my team. And then she told them. And I didn't	16:37:20
25	know what to do, and I didn't know how to handle	16:37:25

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1	it, because that's not the way that I planned to	16:37:27
2	log my concerns.	16:37:33
3	And it was especially upsetting because I	16:37:37
4	now was -- confirmed everything that I was afraid	16:37:41
5	of, which is that they didn't find it to be an	16:37:43
6	issue. They didn't say absofuckinglutely not,	16:37:46
7	this will never happen again. They said it's my	16:37:51
8	fault, it's not his. "I thought you wanted to see	16:37:53
9	it."	16:37:55
10	They didn't ensure me that I would have a	16:37:56
11	safe set. They didn't offer me HR people to call.	16:38:00
12	They didn't tell me who was responsible, ever.	16:38:03
13	Not then, not before. And I had to keep working	16:38:06
14	with these people, and I had to do sex scenes with	16:38:12
15	these people, and I had to do a rape scene with	16:38:15
16	this person, and I had no one to go to.	16:38:18
17	Q Did you have a body double that could have	16:38:20
18	done that scene?	16:38:22
19	A When we came back, I asked for a body	16:38:23
20	double, yes.	16:38:26
21	Q And did you ultimately have the body	16:38:27
22	double do that scene?	16:38:29
23	A No, because it was after the protections	16:38:31
24	were in place and the set was much better.	16:38:32
25	Q At the June 1st meeting, did you --	16:38:35

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1	ATTORNEY HUDSON: Just before you go on,	16:38:44
2	are you okay?	16:38:45
3	THE WITNESS: Yeah.	16:38:46
4	ATTORNEY FREEDMAN: Do you want to take a	16:38:46
5	break?	16:38:47
6	THE WITNESS: No, it's fine. Let's go.	16:38:47
7	Q On the June 1st meeting, did you expressly	16:38:50
8	tell Mr. Baldoni and Mr. Heath that there were	16:38:54
9	serious HR problems on the set?	16:38:58
10	A I don't know what words I used because I	16:39:02
11	wasn't planning on addressing the HR issues with	16:39:05
12	them directly in my trailer with Alex Saks in that	16:39:09
13	moment. But I did express real concern for the	16:39:15
14	things that had occurred thus far, including Jamey	16:39:18
15	entering my trailer when I was naked from the	16:39:22
16	waist up.	16:39:27
17	Q So when Jamey showed you the video of the	16:39:27
18	birthing scene, the afterbirthing scene -- are you	16:39:35
19	familiar with that?	16:39:40
20	ATTORNEY HUDSON: Objection.	16:39:40
21	A That's not what I said, no.	16:39:42
22	Q Do you recall Jamey showing you a still	16:39:43
23	image on his iPhone?	16:39:48
24	ATTORNEY HUDSON: Objection.	16:39:50
25	A No, I recall a moving image.	16:39:51

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1	Q Did you watch the movie?	16:39:54
2	ATTORNEY HUDSON: Objection.	16:39:55
3	A Movie? I wouldn't characterize it as a	16:39:56
4	movie, no.	16:39:59
5	Q Well, did you just say "movie image"?	16:40:00
6	A "Moving image."	16:40:03
7	Q Oh, "moving image." I apologize.	16:40:05
8	Did you watch the moving image?	16:40:07
9	A As soon as I saw that it was a naked woman	16:40:10
10	fully exposed, I asked him to stop.	16:40:14
11	Q Was there a birthing scene during the	16:40:20
12	production of It Ends With Us?	16:40:27
13	A We had already shot the birthing scene	16:40:29
14	when he showed me that video.	16:40:32
15	Q And did he tell you why he was showing you	16:40:34
16	the video?	16:40:36
17	A No.	16:40:37
18	Q And he just showed it to you without	16:40:38
19	explaining anything about it?	16:40:42
20	A Yes.	16:40:43
21	Q And you just looked at it and -- how long	16:40:44
22	did you look at it for?	16:40:48
23	ATTORNEY HUDSON: Objection.	16:40:49
24	A Very briefly.	16:40:51
25	Q "Very briefly" meaning two minutes, a	16:40:52

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1	minute?	16:40:57
2	A I stopped it as soon as I saw that there	16:40:57
3	was a naked woman he was showing me. Because I	16:40:59
4	didn't know what it was. There was no context.	16:41:02
5	He did not ask if I wanted to see it. He did not	16:41:05
6	ask for my consent. I asked if -- he told me it	16:41:08
7	was his wife giving birth. I asked if she had	16:41:12
8	given consent to share that with me.	16:41:16
9	Q And what did she say?	16:41:18
10	A She wasn't there.	16:41:22
11	Q What did he say that she said?	16:41:24
12	A "She's not weird about that kind of	16:41:26
13	stuff."	16:41:28
14	Q Did he tell you why he was showing it to	16:41:29
15	you?	16:41:31
16	A No.	16:41:31
17	Q You had no idea whatsoever why he was	16:41:33
18	showing it to you?	16:41:36
19	ATTORNEY HUDSON: Objection.	16:41:37
20	A No. There was no reason to show me that	16:41:38
21	that day. We were shooting in a Boston bar.	16:41:45
22	Q During the June 1st meeting that we were	16:41:50
23	just talking about attended by yourself, Jamey,	16:41:57
24	Justin and Alex Saks, during that meeting, did you	16:42:01
25	call the actions by Justin Baldoni sexual	16:42:07

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1	harassment?	16:42:10
2	A What actions?	16:42:12
3	Q The actions that you raised at that	16:42:15
4	June 1st meeting.	16:42:19
5	ATTORNEY HUDSON: Objection.	16:42:20
6	A I don't believe he would have said to a	16:42:21
7	man, it's not his fault, it's mine, "I thought you	16:42:29
8	wanted to see it," without acknowledgment or	16:42:34
9	apology or reparations or -- no, I do feel that I	16:42:36
10	was treated differently.	16:42:40
11	Q Yeah, I just want to know what you said at	16:42:42
12	the meeting.	16:42:44
13	So I'm asking you during that June 1st	16:42:45
14	meeting, did you call the actions by Justin	16:42:47
15	Baldoni sexual harassment at that meeting?	16:42:51
16	A Which actions?	16:42:54
17	Q Any actions that he had -- that you had	16:42:55
18	raised at that June 1st meeting.	16:42:58
19	ATTORNEY HUDSON: Objection.	16:43:00
20	A I remember discussing the video that Jamey	16:43:03
21	showed me. I remember discussing the -- Jamey	16:43:13
22	entering my trailer. And I remember -- I don't	16:43:22
23	know if I told him this or if this is another	16:43:29
24	thing that Ange shared, but how bad it felt for	16:43:33
25	him to tell me personally that I felt sex -- that	16:43:40

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1 I looked sexy and that I looked hot, and that I 16:43:43
2 was also disturbed by the way that I understood 16:43:49
3 Jenny to be feeling and experiences I'd seen with 16:43:56
4 her. 16:44:00

5 Q During the June 1st meeting, did you call 16:44:00
6 the actions by Justin sexual harassment? Did you 16:44:07
7 use that term? 16:44:11

8 A I remember using the word "HR claims." 16:44:12

9 Q HR what? 16:44:18

10 A "Claims." 16:44:19

11 Q Claims. 16:44:20

12 During the meeting on June 1st, did you 16:44:21
13 call the actions by Jamey sexual harassment? 16:44:24

14 ATTORNEY HUDSON: Objection. 16:44:29

15 A I think the actions that I'm describing 16:44:30
16 are pretty obviously sexual harassment. 16:44:35

17 Q I'm asking you whether you actually called 16:44:41
18 them that at the meeting that was attended by 16:44:43
19 these people. 16:44:46

20 A Like I said, I don't -- -- 16:44:47

21 ATTORNEY HUDSON: Objection. 16:44:49

22 A -- remember what words were used because I 16:44:49
23 never intended to talk to them about it -- 16:44:54

24 Q All right. 16:44:57

25 A -- themselves. I intended to formally 16:44:59

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1	[REDACTED]	17:22:57
2	[REDACTED]	17:23:00
3	[REDACTED]	17:23:09
4	[REDACTED]	17:23:13
5	[REDACTED]	17:23:20
6	[REDACTED]	17:23:26
7	[REDACTED]	17:23:31
8	[REDACTED]	17:23:39
9	[REDACTED]	17:23:41
10	[REDACTED]	17:23:45
11	[REDACTED]	17:23:52
12	[REDACTED]	17:23:55
13	[REDACTED]	17:23:56
14	Q When did the smear campaign end?	17:24:00
15	ATTORNEY HUDSON: Objection.	17:24:05
16	A It doesn't feel like it's ended.	17:24:06
17	Q It's still ongoing?	17:24:10
18	A It feels that way, yes.	17:24:12
19	Q Who do you believe is involved in the	17:24:14
20	ongoing smear campaign?	17:24:19
21	ATTORNEY HUDSON: Objection to the extent	17:24:22
22	that calls for attorney-client privileged	17:24:23
23	communications.	17:24:25
24	You can answer if you can answer that	17:24:26
25	question without revealing attorney-client	17:24:28

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1	privileged information.	17:24:30
2	A I believe -- outside of what I know	17:24:31
3	through attorneys, I believe that the defendants	17:24:35
4	are involved.	17:24:43
5	Q Which ones?	17:24:44
6	A All of them. And I believe you are.	17:24:50
7	Q And what is the basis for your belief that	17:24:57
8	all of the defendants and myself are involved in	17:25:08
9	an ongoing smear campaign?	17:25:14
10	ATTORNEY HUDSON: Same objection. And I'm	17:25:18
11	having to object with respect to attorney-client	17:25:23
12	privilege. If you can answer that question	17:25:24
13	without revealing attorney-client privileged	17:25:27
14	communications, you can answer.	17:25:29
15	A Outside of what I know through my	17:25:30
16	attorneys, I believe the act of a retaliatory	17:25:32
17	lawsuit and the press that you have done and the	17:25:39
18	statements that you have made about me and my	17:25:50
19	character have felt incredibly retaliatory.	17:25:53
20	Q What about the defendants, what did they	17:26:00
21	do that's part of the ongoing smear campaign?	17:26:12
22	A Like I said, outside of conversations with	17:26:16
23	my attorney, I'm unable to answer that.	17:26:18
24	[REDACTED]	17:26:25
25	[REDACTED]	17:27:01

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1 I would do a Colleen Hoover film, because the 17:34:12
2 narrative or the sentiment was that this book 17:34:18
3 romanticized and sexualized, more specifically, 17:34:28
4 not romanticized, but sexualized domestic 17:34:30
5 violence. 17:34:33

6 Q And does negative press bother you? 17:34:34

7 ATTORNEY HUDSON: Objection. 17:34:38

8 A I'm used to it after this many years in 17:34:43
9 the industry, but it's not something I've had to 17:34:48
10 deal with often. 17:34:53

11 Q Well, I mean, it's true that you dealt 17:34:58
12 with negative press with respect to being married 17:35:01
13 on a plantation during, kind of, the height of 17:35:04
14 Black Lives Matter; is that right? 17:35:07

15 ATTORNEY HUDSON: Objection. 17:35:09

16 A It's true that I dealt with negative press 17:35:09
17 during that. I was not married then. And I feel 17:35:13
18 like that negative press was deserved. It's a 17:35:18
19 mistake we have publicly acknowledged and done a 17:35:22
20 lot of work to reconcile for ourselves and others. 17:35:32

21 Q And just to be clear, you're not alleging 17:35:36
22 that anything related to the plantation wedding is 17:35:40
23 part of the smear campaign; is that correct? 17:35:44

24 ATTORNEY HUDSON: Objection. 17:35:47

25 A No. 17:35:50

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1	Q No, it's not correct or yes, it's correct?	17:35:51
2	ATTORNEY HUDSON: Well, objection.	17:35:56
3	A Well, your question was unclear. Can you	17:35:58
4	say it again?	17:35:59
5	Q One more time, again, I apologize.	17:36:00
6	Is any of the press that came out	17:36:04
7	around -- that was negative around the fact that	17:36:07
8	you were married on a plantation, is it your	17:36:08
9	position that you believe that's part of the smear	17:36:11
10	campaign?	17:36:14
11	ATTORNEY HUDSON: Objection.	17:36:15
12	A I don't know all that was utilized to --	17:36:16
13	all that was created, dredged up as a part of this	17:36:32
14	smear campaign.	17:36:40
15	I take full accountability for that	17:36:41
16	decision, as does my husband, but I don't know	17:36:44
17	what weaponizations of the past has been a part of	17:36:54
18	the campaign.	17:37:00
19	Q What do you mean by "dredged up"?	17:37:01
20	A I mean that both directly and indirectly,	17:37:04
21	by creating this environment, it -- there was a	17:37:14
22	story that was being told about me suddenly on	17:37:25
23	August 9th that I was a -- it was about my	17:37:30
24	character. I was a mean girl, that I was a bully.	17:37:34
25	Most specifically that I was a bully. And my	17:37:37

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1	character was being attacked.	17:37:41
2	And as a result, there were stories that	17:37:43
3	were things I had never heard of and experiences I	17:37:50
4	never had, as well as a mosaic of any context-free	17:37:57
5	negative moment from my past.	17:38:07
6	Q Did you -- do you believe that you've	17:38:08
7	never received -- before the smear campaign, you'd	17:38:15
8	never received negative press that called you a	17:38:18
9	bully?	17:38:21
10	ATTORNEY HUDSON: Objection.	17:38:22
11	A That's not what I said. I don't tend to	17:38:23
12	read much press, but I have generally experienced	17:38:31
13	a general level of positive and stable, healthy	17:38:43
14	press.	17:38:48
15	Q Do you recall anyone referring to you	17:38:50
16	prior to the smear campaign as a bully or as a	17:38:53
17	mean girl --	17:38:58
18	ATTORNEY HUDSON: Objection.	17:38:58
19	Q -- in the press?	17:38:59
20	ATTORNEY HUDSON: Objection.	17:39:00
21	A Specifically, no.	17:39:00
22	Q So this was all new to you at this time?	17:39:03
23	ATTORNEY HUDSON: Objection.	17:39:10
24	A The magnitude with which these stories hit	17:39:12
25	without any one event happening was not only new	17:39:23

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1	ATTORNEY HUDSON: Objection.	17:54:27
2	A I did not ask that of anyone. Like I	17:54:28
3	said, as a part of the return-to-work protections,	17:54:32
4	my lawyers negotiated with both the Wayfarer	17:54:35
5	parties -- and as Wayfarer represented it, Sony as	17:54:38
6	well -- on what would happen to the footage that	17:54:44
7	was most sensitive in nature.	17:54:47
8	Q So you never asked or had anybody on your	17:54:54
9	behalf ask anyone from Sony to destroy the	17:54:59
10	dailies; is that correct?	17:55:03
11	ATTORNEY HUDSON: Objection.	17:55:04
12	A No, I never asked anyone to destroy	17:55:05
13	dailies, no.	17:55:08
14	Q What about did you ask anyone on your	17:55:10
15	behalf to contact Sony to destroy the dailies?	17:55:12
16	A To destroy the dailies?	17:55:15
17	ATTORNEY HUDSON: Objection.	17:55:18
18	A No.	17:55:19
19	Q Did you ever draft an HR complaint?	17:55:19
20	A I don't know what that means.	17:55:54
21	Q Human resources complaint, did you ever	17:55:56
22	fill one out?	17:55:58
23	ATTORNEY HUDSON: Objection.	17:55:59
24	A I was never provided an HR resource.	17:56:00
25	Q So is that no, you did not?	17:56:04

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1	ATTORNEY HUDSON: Objection.	17:56:07
2	A I went to my attorneys and asked for HR	17:56:08
3	protections because I was not provided an HR	17:56:11
4	resource, no.	17:56:16
5	Q So in August of 2023, you had not drafted	17:56:18
6	any type of HR complaint; is that correct?	17:56:38
7	ATTORNEY HUDSON: Objection.	17:56:41
8	A Like I said, I wasn't provided an HR	17:56:43
9	resource. I had made attempts to file HR claims.	17:56:48
10	Q You made attempts to file written HR	17:56:55
11	complaints claims or oral ones?	17:56:57
12	A Wayfarer parties never offered me or made	17:57:01
13	me aware of who to go to for HR.	17:57:08
14	That's standard on a set. I don't know	17:57:14
15	movies that happen anymore in which the actor	17:57:17
16	doesn't have to do an HR meeting along with the	17:57:22
17	rest of the crew. That's a requirement.	17:57:27
18	But this film did not provide it, as far	17:57:31
19	as I'm aware. And so I called Ange Giannetti and	17:57:34
20	told her that I would like to file one through	17:57:43
21	Sony and was told that I couldn't.	17:57:46
22	Q Did you ever refer to the Wayfarer	17:57:48
23	defendants as "clowns"?	17:57:51
24	A That sounds familiar.	17:57:54
25	Q Did you ever refer to them as "doofuses"?	17:57:56

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1	Q What film was that?	18:02:15
2	A I don't recall the name.	18:02:16
3	Q And that didn't happen as a result of you	18:02:18
4	being sexually harassed or did that not happen as	18:02:20
5	a result of the smear campaign?	18:02:23
6	ATTORNEY HUDSON: Objection.	18:02:24
7	A I don't believe those two are mutually	18:02:25
8	exclusive. I believe that I was sexually harassed	18:02:29
9	and retaliated against. And part of that	18:02:32
10	retaliation was a smear campaign. And that smear	18:02:34
11	campaign harmed my prospective work opportunities.	18:02:37
12	Q Have you worked since it ends with us?	18:02:43
13	A Have I worked?	18:02:45
14	Q Yes.	18:02:46
15	A Can you be more specific.	18:02:47
16	Q Have you had a job which pays you money?	18:02:48
17	ATTORNEY HUDSON: Objection.	18:02:51
18	A I work regularly. I don't get paid money	18:02:56
19	from my work.	18:03:01
20	Q What jobs have you had since it ends with	18:03:02
21	us?	18:03:05
22	ATTORNEY HUDSON: Objection.	18:03:06
23	A I have a company called Betty Buzz, and I	18:03:07
24	have a company called Blake Brown.	18:03:15
25	Q And you've done no other work since the	18:03:20

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1 end of it ends with us other than working on those 18:03:25
2 two companies? 18:03:28

3 ATTORNEY HUDSON: Objection. 18:03:28

4 Q Have you? 18:03:32

5 A No, I don't believe so. 18:03:32

6 Q Were you in a movie with Anna Kendrick? 18:03:33

7 A Are you asking about -- I understood your 18:03:40
8 question to be since it ends with us came out. 18:03:42

9 Are you asking since I shot it ends with 18:03:44
10 us? 18:03:46

11 Q That's correct, since you shot it ends 18:03:47
12 with us. 18:03:49

13 A Okay. 18:03:49

14 Q Since the beginning of the smear campaign. 18:03:49

15 ATTORNEY HUDSON: Objection. 18:03:52

16 A You're using your definition in different 18:03:52
17 ways. The way you have defined the smear campaign 18:03:57
18 for purposes of today is the digital manipulation 18:04:00
19 that occurred in August of 2024. That's when the 18:04:03
20 film was released. So that's what I understood us 18:04:07
21 to be talking about. 18:04:10

22 Are you asking -- are you asking about 18:04:11
23 from the time the film was completed being shot or 18:04:14
24 from when it was released? 18:04:18

25 Q Did you go to Toronto Film Festival on a 18:04:19

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1	movie that involved Anna Kendrick also?	18:04:24
2	A When?	18:04:28
3	Q Did you go to any -- it was actually	18:04:30
4	Austin.	18:04:33
5	Did you go to Austin on a film that	18:04:34
6	involved Anna Kendrick?	18:04:36
7	A Yes. I just don't want to misstate my	18:04:41
8	testimony. So when you say "since It Ends With	18:04:42
9	Us," I just want to be clear for the record that I	18:04:45
10	understood you to be saying since it ends with us	18:04:47
11	came out, because you're timestamping it from the	18:04:49
12	smear campaign.	18:04:51
13	So I have done a movie since it ends with	18:04:52
14	us finished shooting. I have not done a movie	18:04:55
15	since it ends with us came out and the retaliation	18:04:57
16	campaign started.	18:05:02
17	Q Have you received any offers of	18:05:03
18	employment?	18:05:07
19	ATTORNEY HUDSON: Objection.	18:05:08
20	A "Of employment"? I don't know what that	18:05:11
21	means.	18:05:12
22	Q Well, has anybody offered you a role in a	18:05:13
23	movie or asked you to take a look at a movie to be	18:05:16
24	an actress or a writer or a director or an actor	18:05:18
25	or any role?	18:05:26

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1	A Since --	18:05:28
2	ATTORNEY HUDSON: Objection.	18:05:29
3	A Since when?	18:05:29
4	Q Since it ends with us came out.	18:05:30
5	A Not that I'm aware of.	18:05:35
6	Q Who are your family members that have been	18:05:39
7	substantially harmed?	18:05:44
8	ATTORNEY HUDSON: Objection.	18:05:50
9	A My husband and children.	18:05:51
10	Q Anyone else?	18:05:54
11	A I believe that my mother and my siblings	18:05:57
12	have been emotionally harmed. And I believe my	18:06:06
13	sister and her husband have been harmed as well.	18:06:15
14	Q You've won some accolades since it ends	18:06:20
15	with us has come out; is that true?	18:06:27
16	ATTORNEY HUDSON: Objection.	18:06:29
17	A I don't know.	18:06:30
18	Q Were you selected in -- having something	18:06:31
19	to do with either Time 100 or People 100?	18:06:36
20	Did anybody honor you?	18:06:42
21	ATTORNEY HUDSON: Objection.	18:06:46
22	A I don't think that's characterized as	18:06:46
23	winning an accolade. But, yes, I was honored at	18:06:50
24	the Time 100 -- in the Time 100 list and at the	18:06:53
25	event.	18:06:56

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1	great your rooftop scene writing was?	18:27:13
2	ATTORNEY HUDSON: Objection.	18:27:15
3	A No, that's not how I would characterize	18:27:16
4	what happened.	18:27:18
5	Q How would you characterize what happened?	18:27:19
6	A I -- Taylor was coming to my apartment	18:27:22
7	anyway to hang out. Justin was still there. I	18:27:26
8	was very afraid of the state of the script, given	18:27:34
9	that he had been adding naughty doctor scenes and	18:27:38
10	then some, which we've discussed earlier.	18:27:46
11	And I was aware at this point that I could	18:27:53
12	not get out of the film. I was also aware that	18:27:55
13	Justin was not -- it didn't feel like he was	18:28:02
14	making forward progress. He had changed the	18:28:10
15	script significantly from the one I had signed on	18:28:14
16	to. I didn't know he was changing it	18:28:18
17	significantly.	18:28:22
18	He told me -- he sent me a script and I	18:28:23
19	said, "Can you send me a version with stars on	18:28:27
20	it," which is what happens when you change a line,	18:28:34
21	a star shows up in the margin.	18:28:36
22	And he said, "Oh, I'm 15 drafts in from	18:28:38
23	the original. If I sent you a version with stars	18:28:41
24	on it, the whole thing would be starred."	18:28:43
25	So the entire film that I had agreed to	18:28:46

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1 was changing significantly. I knew I couldn't get 18:28:49
2 out of the film. I was trying to do anything I 18:28:54
3 could to make it better -- because I requested 18:28:58
4 that we go back to the draft that I had agreed to 18:29:04
5 join the movie on, and he said we've already been 18:29:08
6 prepping this one, we can't go back. 18:29:11

7 I didn't know any of that was happening. 18:29:14
8 I tried -- I sent him pages. He was busy that 18:29:15
9 weekend. I think he had a friend in town. And I 18:29:21
10 didn't feel like he was taking it very seriously 18:29:25
11 that the script was of concern. 18:29:31

12 And other people in my life, mutual people 18:29:35
13 that he knows as well, were very concerned about 18:29:37
14 the state of the script. 18:29:41

15 And I sent Taylor the script on her way to 18:29:46
16 my apartment because Justin was still there, and I 18:29:49
17 asked her to read them. I told her she didn't 18:29:52
18 have to, I didn't want her to feel pressured to do 18:29:57
19 that, but I hoped that she would. And if she 18:30:00
20 liked them, if she could express enthusiasm, 18:30:03
21 because I was hoping that that would create some 18:30:07
22 excitement and that he might pay closer attention 18:30:12
23 to them. 18:30:20

24 Q Isn't it true you told her that whether or 18:30:22
25 not she readed them -- she read your pages, that 18:30:27

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1	record and the time is 6:33 P.M.	18:33:45
2	(Recess.)	18:33:54
3	THE VIDEOGRAPHER: We are back on the	18:41:24
4	record and the time is 6:42 P.M.	18:42:43
5	EXAMINATION BY	18:42:46
6	ATTORNEY BABCOCK:	18:42:47
7	Q Ms. Lively, my name is Chip Babcock. This	18:42:47
8	is Joel Glover. We represent Jed Wallace and	18:42:50
9	Street Relations, Inc.	18:42:53
10	A Okay.	18:42:54
11	Q Nice to meet you across the table.	18:42:54
12	A Nice to meet you.	18:42:56
13	Q Sorry about the circumstances, but it is	18:42:58
14	what it is.	18:43:00
15	A I appreciate it.	18:43:00
16	Q I've just handed you Exhibit 1000, not	18:43:01
17	1,001. That's just a notice of deposition. It's	18:43:04
18	not a big deal, we just like to keep records. So	18:43:06
19	you're here and thank you for being here.	18:43:10
20	(Exhibit 1000, marked for identification.)	18:43:12
21	A Okay. Do I need to take the time to read	18:43:12
22	this?	18:43:14
23	Q No.	18:43:14
24	A Okay.	18:43:14
25	Q You can if you want, but there is just	18:43:15

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1	legal gobbledygook in there, so not a problem.	18:43:18
2	Would you tell me what your definition is	18:43:22
3	of personal knowledge?	18:43:25
4	ATTORNEY HUDSON: Objection.	18:43:28
5	A Knowledge that I retain myself without	18:43:29
6	the -- in this context, without attorneys.	18:43:45
7	Q Good. I was hoping you'd say that,	18:43:50
8	because all of my questions are going to be asking	18:43:53
9	you about your personal knowledge.	18:43:55
10	A Okay.	18:43:57
11	Q And I don't want you to rely on your	18:43:57
12	attorneys, something your attorneys may have told	18:44:00
13	you, for reasons why there have been objections	18:44:02
14	previously.	18:44:05
15	A Yeah.	18:44:05
16	Q She can still object if she wants --	18:44:06
17	A Okay.	18:44:09
18	Q -- but she doesn't have to, because I'm	18:44:09
19	not asking about that.	18:44:11
20	Have you ever met Jed Wallace?	18:44:12
21	A I have not, no.	18:44:15
22	Q Have you ever talked with him?	18:44:16
23	A Not to my knowledge, no.	18:44:17
24	Q Okay. Have you ever corresponded with	18:44:21
25	him?	18:44:23

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1 A Not to my knowledge, no. 18:44:23

2 Q Do you know what he looks like? 18:44:25

3 A I don't. 18:44:27

4 Q Okay. You do know he lives in Texas? 18:44:28

5 ATTORNEY HUDSON: Objection. 18:44:31

6 A I do. 18:44:32

7 Q Okay. You listed -- I thought I heard -- 18:44:33

8 I may ask you questions you've already been asked, 18:44:41

9 but I didn't catch everything down there. 18:44:43

10 You listed everybody you thought had 18:44:46

11 harassed you, and I don't think I heard 18:44:49

12 Mr. Wallace's name. 18:44:53

13 But the question is, is Mr. Wallace among 18:44:54

14 the people that harassed you or not? 18:44:56

15 ATTORNEY HUDSON: Objection. 18:44:59

16 A I have never met Jed Wallace, so I do not 18:44:59

17 think he participated in physical, sexual 18:45:02

18 harassment. 18:45:08

19 Q Okay. 18:45:08

20 A I believe he was a part of the retaliation 18:45:08

21 campaign that was a result of that -- 18:45:11

22 Q And that's -- 18:45:15

23 A -- harassment. 18:45:15

24 Q Were you done with your answer? 18:45:16

25 ATTORNEY HUDSON: Sorry. I just want to 18:45:16

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1 about some publication, some things that are 18:47:31
2 tangible -- you know, you can read them, and I'm 18:47:35
3 just trying to find out if you're aware of 18:47:37
4 anything that Jed Wallace has published about you 18:47:39
5 that you complain about that would be part of a 18:47:46
6 smear campaign. 18:47:49

7 ATTORNEY HUDSON: Objection. 18:47:50

8 A Sorry, I don't think I understand the 18:47:53
9 question. 18:47:56

10 Q In -- in the law that the thousands of 18:47:56
11 people who are witnessing this deposition practice 18:48:03
12 a lot, there is a thing called libel, which is 18:48:07
13 written defamation disparagement, and then there 18:48:11
14 is a slander, which is oral defamation or 18:48:16
15 disparagement. So I'm focusing on written. 18:48:19

16 Is there anything you've seen in writing 18:48:22
17 that you believe that Mr. Wallace has authored 18:48:24
18 that is defamatory, disparaging or says mean 18:48:28
19 things about you? 18:48:33

20 A That's happening currently? 18:48:36

21 Q Well, let's start with currently, sure. 18:48:37

22 A Currently, I don't read news about me or 18:48:39
23 go on social media about me. So personally, I 18:48:48
24 don't have knowledge, no. 18:48:55

25 Q Okay. And that's as of today. 18:48:57

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1	And going backward in time, can you	18:49:02
2	identify any written thing that you believe	18:49:06
3	Mr. Wallace published about you that is	18:49:09
4	defamatory, disparaging, in any way offending to	18:49:14
5	you?	18:49:18
6	ATTORNEY HUDSON: Objection.	18:49:18
7	A A specific article or -- no, I don't know	18:49:19
8	a specific -- I don't know a specific article.	18:49:29
9	Q Okay. And it could be a post, anything in	18:49:32
10	writing that you can look at it like I'm looking	18:49:34
11	at this screen and reading.	18:49:37
12	And you're not aware of anything that he's	18:49:39
13	authored that you can actually see whether it's a	18:49:41
14	post, an article, or a video or something like	18:49:45
15	that, correct?	18:49:48
16	ATTORNEY HUDSON: Objection.	18:49:48
17	A I can't cite a specific article. I -- my	18:49:49
18	understanding from the documents I received is	18:49:59
19	that he was a part of this campaign which	18:50:03
20	contained a lot of content. But to be able to	18:50:13
21	name one specific article, if that's what you're	18:50:18
22	asking, no.	18:50:21
23	Q Yeah. Okay.	18:50:22
24	And you were right to focus on one	18:50:23
25	specific article, and I also wanted to focus on	18:50:27

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1 one specific author, which would be Mr. Wallace. 18:50:30

2 And are you aware of any specific article 18:50:35

3 that he authored himself, maybe in conjunction 18:50:37

4 with others, but that he authored himself? 18:50:41

5 ATTORNEY HUDSON: Objection. 18:50:44

6 A With his name on it? No. I understand 18:50:45

7 Mr. Wallace's work to be quite clandestine, so I'm 18:50:51

8 not aware of anything that has his name on it, no. 18:51:00

9 Q How do you know his work was quite 18:51:03

10 clandestine? 18:51:06

11 A That's how it's been described to me by 18:51:07

12 everyone who knows him, that -- yeah, that 18:51:13

13 everyone who I've spoken with who knows him. It's 18:51:17

14 also what was described in the documents we 18:51:21

15 received, both in the Joneswork documents, as well 18:51:27

16 as documents in discovery. 18:51:35

17 Q Who described him to you as quite 18:51:36

18 clandestine? You said that people told you that, 18:51:39

19 who told you that? 18:51:43

20 A I don't know that those were the words 18:51:44

21 that were used. 18:51:45

22 Q Sure. 18:51:47

23 A That was the general sort of descriptor, 18:51:48

24 or the general idea. 18:51:52

25 ATTORNEY HUDSON: And you're excluding 18:51:53

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1	counsel?	18:51:55
2	ATTORNEY BABCOCK: Always.	18:51:56
3	A I was told by Stephanie Jones about his --	18:51:59
4	the nature of the way he works and how he works	18:52:09
5	and -- so Stephanie Jones.	18:52:15
6	There are -- well, outside of attorneys,	18:52:24
7	yeah, he has that reputation. Yeah, a lot of what	18:52:31
8	I know of that is through attorneys.	18:52:38
9	But I -- also in the messages, I don't	18:52:41
10	remember if it was Jennifer Abel or Melissa Nathan	18:52:47
11	who described his work as untraceable. And there	18:52:51
12	were other messages which --	18:52:59
13	Q Okay. So the three names of people who	18:53:04
14	might have described him as quite clandestine	18:53:06
15	would be Stephanie Jones, Melissa Nathan, and	18:53:09
16	Jennifer Abel.	18:53:13
17	Would that be correct?	18:53:15
18	A There were others. I don't remember if it	18:53:16
19	was Katie Case or Brianna Koslow, who also	18:53:19
20	described his work in the documents that we've...	18:53:28
21	Q Does Ms. Koslow also go by Butler?	18:53:32
22	ATTORNEY HUDSON: Objection.	18:53:35
23	A I don't know.	18:53:36
24	Q Okay. In any event, are Ms. Case and	18:53:36
25	Koslow, are they part of the conspiracy against	18:53:41

1 of the narratives were assault on your character, 18:56:31
2 that you were a mean girl, and that you're a 18:56:36
3 bully? Those would be three of the -- when you 18:56:39
4 say "many assaults"? 18:56:41

5 A Yes. 18:56:43

6 Q Okay. Can you name anything else? I 18:56:45
7 mean, I understand it was a lot of negativity, and 18:56:47
8 it was swirling around, but can you name anything 18:56:49
9 else specifically other than those three things 18:56:52
10 that you mentioned earlier in your testimony? 18:56:56

11 A It was a really painful time, so it was a 18:56:59
12 time that I was trying to stay offline as much as 18:57:05
13 possible. And I have four children, four young 18:57:10
14 children, so I was not spending time online every 18:57:17
15 day. It was too much. 18:57:22

16 So I don't remember specific articles or 18:57:25
17 narratives because I was doing my best to stay 18:57:34
18 away from it. 18:57:43

19 Q Okay. So as we sit here today, and I 18:57:44
20 understand there may be reasons why you don't know 18:57:48
21 sitting here today, but character, mean girl, and 18:57:51
22 bully would be three, and you can't remember any 18:57:55
23 else, correct? 18:57:58

24 ATTORNEY HUDSON: Objection. 18:58:01

25 A There were a lot -- there were a lot of 18:58:02

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1 narratives. Yeah, I remember those. Those stick 18:58:06
2 out to me the most. But because it's been 18:58:13
3 unrelenting since August, it's been a year of 18:58:19
4 this, so I've really had to disconnect from the 18:58:21
5 media or social media. So it's hard to know where 18:58:27
6 to start. 18:58:37

7 Q Sure. 18:58:39

8 Even though it's been unrelenting for a 18:58:42
9 year, you can't identify anything other than 18:58:44
10 character, mean girls, and bully as you sit here 18:58:47
11 today, correct? 18:58:50

12 ATTORNEY HUDSON: Objection. 18:58:51

13 A No, like I said, there were -- there were 18:58:52
14 so many narratives -- 18:58:59

15 Q Sure. 18:59:00

16 A -- I don't know where to start. 18:59:01

17 I'm not -- I don't think I'm understanding 18:59:05
18 what you're asking of me. 18:59:07

19 Q Why don't we start with us. Just a little 18:59:09
20 joke there, sorry. 18:59:15

21 Anytime you're in a case like this where 18:59:17
22 words are -- either spoken or in writing are at 18:59:21
23 issue, it's important for the defendants to find 18:59:24
24 out what words you're complaining about. And you 18:59:26
25 testified earlier, and I did hear this, that you 18:59:31

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1 were upset that your -- they said your character 18:59:36
2 was -- you know, they called you a liar or 18:59:40
3 something like that, and that you're a mean girl 18:59:42
4 and you're a bully. So those are specific things 18:59:44
5 that we can react to. But just to say there is a 18:59:49
6 lot of stuff isn't helpful when you're trying to 18:59:52
7 defend a case. So that's why I'm trying to -- 18:59:54
8 that's what I'm getting at. 18:59:55

9 A I understand. 18:59:58

10 Q So if there is anything other than 18:59:58
11 character, mean girls, and bully, tell me now. 19:00:00
12 And otherwise, we'll go on to some other things, 19:00:03
13 because I have limited time to ask you questions. 19:00:06

14 A I understand. 19:00:08

15 The difficulty I'm having in knowing how 19:00:09
16 to answer this is that under each of those pillars 19:00:11
17 is a flood of different stories and content and 19:00:16
18 narrative. So I can look at those as headlines, 19:00:23
19 but if we're meant to be more granular within 19:00:32
20 that, that's not what I'm not understanding. 19:00:36

21 Q Okay. Well, that's helpful, because those 19:00:38
22 are the three headlines or the three pillars as 19:00:40
23 you -- and then there may be variations underneath 19:00:43
24 those three pillars, fair? 19:00:45

25 A What -- can you say the three? I don't 19:00:48

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1	ATTORNEY HUDSON: Objection.	19:02:35
2	A No, that's not what I'm saying.	19:02:36
3	Q Okay. I didn't think so. I just wanted	19:02:37
4	to be clear.	19:02:39
5	All right. I just want to get a timeline	19:02:40
6	of things.	19:02:48
7	The production started in early May of	19:02:49
8	2023, is that right, of the movie it ends with us?	19:02:51
9	A The filming itself started, I believe,	19:02:56
10	yeah, in May of 2023.	19:02:58
11	Q Okay. And was that in California?	19:02:59
12	A No, it was in New Jersey.	19:03:04
13	Q Oh, I thought everything was in	19:03:09
14	California.	19:03:10
15	Okay. And then there was a writers'	19:03:11
16	strike that stopped it in June of '23 -- 2023,	19:03:16
17	correct?	19:03:24
18	A Correct.	19:03:25
19	Q And then production resumed maybe on	19:03:26
20	January 5th of 2024; is that right?	19:03:33
21	A That sounds correct.	19:03:35
22	Q Okay. Was that also in New Jersey or was	19:03:36
23	that in California?	19:03:38
24	A That was in New Jersey. We shot a couple	19:03:39
25	days in California at the end.	19:03:42

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1	Q Okay. Was the movie shot anywhere other	19:03:46
2	than New Jersey or California?	19:03:49
3	A I believe they did additional photography	19:03:52
4	and wide shots and inserts -- not inserts, but	19:03:58
5	wider shots of scenery in other locations.	19:04:06
6	Q Do you know where those other locations	19:04:09
7	were?	19:04:12
8	A I don't.	19:04:13
9	Q You weren't involved in them; they just	19:04:13
10	shot them other places?	19:04:16
11	A Yes.	19:04:17
12	Q Okay. Great.	19:04:17
13	ATTORNEY BABCOCK: Joel, I need 1055.	19:04:21
14	(Exhibit 1055, marked for identification.)	19:04:21
15	BY ATTORNEY BABCOCK:	19:04:21
16	Q Last night, we received a second amended	19:04:27
17	complaint, and it's a big thick old thing, and I'm	19:04:31
18	not -- and what I've done is to redline the	19:04:36
19	changes. So it's not how it was filed. It's just	19:04:42
20	how -- how it looks now.	19:04:47
21	And I have a couple of questions about it,	19:04:49
22	not a whole lot, but if -- if you'll turn to	19:05:00
23	paragraph 332, which you'll find on page 118, the	19:05:05
24	second amended complaint, which this is -- have	19:05:13
25	you ever seen it before, by the way?	19:05:17

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1 Q What is astroturfing? 19:09:45

2 A My understanding of astroturfing is when a 19:09:49
3 conversation or sentiment is inorganic. And 19:10:00
4 unlike a grassroots marketing campaign, it is fake 19:10:09
5 in that it is a sentiment that is where there is a 19:10:17
6 particular person, group, or organization behind 19:10:24
7 it. 19:10:27

8 Q Okay. And you say in this complaint that 19:10:27
9 the "coordinated astroturfing campaign to 19:10:37
10 discredit and bury Ms. Lively." 19:10:42

11 What do you mean by bury you, the 19:10:46
12 astroturfing campaign was meant to bury you? 19:10:49

13 ATTORNEY HUDSON: Objection. 19:10:52

14 Q Do you know what that means, what is meant 19:10:52
15 by that? 19:10:54

16 ATTORNEY HUDSON: Objection. 19:10:55

17 A I do. 19:10:56

18 Q And what is meant by that? 19:10:56

19 A They were descriptives that were used by 19:10:58
20 Justin Baldoni, Jennifer Abel, and Melissa Nathan. 19:11:05
21 The term "bury," she wants -- he wants to feel 19:11:08
22 like she can be buried. 19:11:10

23 Q Okay. And -- 19:11:10

24 A And Melissa Nathan said, "We can bury 19:11:14
25 her." 19:11:16

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1	Q Okay.	19:11:16
2	A So that's why that word was chosen.	19:11:17
3	Q This is going to seem like a facetious or	19:11:19
4	silly question, but you didn't take that to mean	19:11:22
5	they were going to physically bury you, just they	19:11:27
6	were going to reputationally bury you? Is that	19:11:29
7	how you took it or not?	19:11:32
8	A When they said that, I felt	19:11:33
9	reputationally.	19:11:39
10	When Steve Sarowitz said that there would	19:11:39
11	be two dead bodies by the time that he was done	19:11:42
12	with us, yeah, I considered that that might be	19:11:45
13	literal.	19:11:48
14	Q You thought you might -- you might be in	19:11:49
15	physical jeopardy?	19:11:51
16	A You -- as a mother, you feel like anything	19:11:53
17	is -- could be possible in those moments. It's	19:12:00
18	terrifying.	19:12:06
19	Q Yeah. Putting aside the physical	19:12:07
20	jeopardy, was -- was the reference to burying and	19:12:12
21	two dead bodies inclusive of reputational injury	19:12:18
22	or not?	19:12:22
23	ATTORNEY HUDSON: Objection.	19:12:23
24	A I'm sorry, I don't understand the	19:12:23
25	question.	19:12:25

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1 When Mr. Freedman allegedly made these 19:21:17
2 defamatory comments on behalf of Mr. Wallace, did 19:21:20
3 he make them prior to the lawsuit -- to that 19:21:25
4 lawsuit, which has now been dismissed, being sent 19:21:29
5 to New York? 19:21:32

6 ATTORNEY HUDSON: Objection. 19:21:32

7 Q How about that? 19:21:33

8 ATTORNEY HUDSON: Objection. 19:21:36

9 A My understanding is that Mr. Freedman's 19:21:37
10 harmful statements started as soon as the first 19:21:45
11 case started, which would be mine. So December of 19:21:55
12 2024. 19:22:01

13 Q Okay. The premiere of it ends with us, 19:22:01
14 the film, was on August 6th of 2024; is that 19:22:16
15 right? 19:22:22

16 A I don't know the exact date, but that 19:22:22
17 sounds correct. 19:22:24

18 Q Okay. 19:22:25

19 ATTORNEY BABCOCK: Have you got 1051? 19:22:27

20 I may have a document that might help. 19:22:29

21 THE WITNESS: Thanks. 19:22:32

22 ATTORNEY BABCOCK: You can -- attach that 19:22:34
23 one. 19:22:38

24 (Exhibit 1051, marked for identification.) 19:22:38

25 BY ATTORNEY BABCOCK: 19:22:57

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1 Q 1051, if you go to the fourth page, next 19:22:57
2 to last page, it says, "Tuesday, August 6th, 19:23:06
3 7:00 P.M., it ends with us premiere, location AMC 19:23:12
4 Lincoln Square, 1998 Broadway, New York, 19:23:16
5 New York." 19:23:20

6 Does that refresh your recollection as to 19:23:20
7 when the premiere was? 19:23:23

8 A Sorry, I wasn't there yet. 19:23:24

9 This is 8981? Tuesday, August 6th, it 19:23:26
10 ends with us premiere. Yes. 19:23:33

11 Q Okay. And the -- the film's release was 19:23:35
12 on August 9th; is that right? 19:23:43

13 A In the United States, yes. It released at 19:23:45
14 different times in different international 19:23:51
15 territories. But for the sake of our 19:23:52
16 conversations today, when I've talked about the 19:23:55
17 day the film was released, I was talking about 19:23:59
18 August 9th. 19:24:01

19 Q Okay. And you testified earlier that that 19:24:02
20 was when you first became aware of the negative 19:24:03
21 argument or the -- sorry, the negative article 19:24:07
22 about you, right? 19:24:12

23 ATTORNEY HUDSON: Objection. 19:24:13

24 A Not an article, no. It felt -- no, not 19:24:13
25 one article. 19:24:22

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1	don't remember specifically who else was there.	19:26:29
2	It was a very emotional and upsetting day. It was	19:26:32
3	hard for me and Isabella to continue our work. We	19:26:40
4	kept breaking because we were incredibly	19:26:42
5	distraught.	19:26:45
6	Q And the statements by the Sony people that	19:26:46
7	you identified were in person in Copenhagen; is	19:26:49
8	that right?	19:26:55
9	A Yes.	19:26:55
10	Q Okay.	19:26:56
11	A There were also Sony representatives in	19:26:57
12	New York and in California and internationally.	19:27:00
13	And my publicist, Leslie Sloane, I believed to be	19:27:06
14	in New York at the time that she called to let me	19:27:11
15	know of the negativity and of the hiring of	19:27:15
16	Melissa Nathan.	19:27:19
17	ATTORNEY BABCOCK: Okay. Object as	19:27:26
18	nonresponsive.	19:27:27
19	Q On December 20th of 2024, you filed a	19:27:28
20	complaint with the civil rights division of the	19:27:38
21	California agency in charge of the Fair Employment	19:27:45
22	and Housing Act, correct?	19:27:55
23	ATTORNEY HUDSON: Objection.	19:27:56
24	A I'd have to read the document to know --	19:27:56
25	Q Sure. I'm going to show it to you.	19:28:02

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1	A -- that you recited it accurately.	19:28:06
2	(Exhibit 1048, marked for identification.)	19:28:06
3	BY ATTORNEY BABCOCK:	19:28:10
4	Q Here you go. Let me hand you	19:28:10
5	Exhibit 1048. There you go.	19:28:15
6	And 1048 is a three-page document that	19:28:23
7	lists Jed Wallace and Street Relations as two of a	19:28:28
8	number of respondents to your complaint of	19:28:36
9	employment discrimination before the State of	19:28:39
10	California, correct?	19:28:42
11	A Jed Wallace's name is listed amongst the	19:28:44
12	defendants, yes.	19:28:50
13	And what was the second part of your	19:28:51
14	question? I'm sorry.	19:28:53
15	Q Street Relations Inc. was also listed,	19:28:54
16	correct, as a respondent?	19:28:56
17	A Yes.	19:28:58
18	Q All right. And this complaint was	19:28:59
19	verified by your outstanding lawyer, Esra Hudson,	19:29:04
20	who is sitting next to you, I think; is that	19:29:08
21	right?	19:29:10
22	ATTORNEY HUDSON: Objection.	19:29:12
23	ATTORNEY BABCOCK: I would object if I	19:29:13
24	were you.	19:29:14
25	Q It's on the last page, I think.	19:29:20

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1	A Yes.	19:29:22
2	Q And she was your lawyer with respect to	19:29:22
3	this complaint, correct?	19:29:24
4	A Yes.	19:29:25
5	Q And the complaint indicates that there is	19:29:26
6	a -- an attachment that says, "Please see attached	19:29:32
7	complaint for specific details."	19:29:36
8	Do you remember that? Do you remember	19:29:40
9	that it had an attachment?	19:29:42
10	A My initial complaint?	19:29:44
11	Q Yes.	19:29:46
12	A Yes.	19:29:46
13	Q Okay.	19:29:48
14	(Exhibit 1049, marked for identification.)	19:29:48
15	BY ATTORNEY BABCOCK:	19:29:52
16	Q Let me hand you 1049.	19:29:52
17	And is that is the attachment?	19:29:54
18	A Well, I'm unable to read all of the pages	19:29:55
19	right now, so I'm going to have to go on trust to	19:29:58
20	know if it's the attachment, so I don't know,	19:30:02
21	but...	19:30:05
22	Q Does that kind of look like what the	19:30:06
23	attachment was?	19:30:08
24	ATTORNEY HUDSON: Objection.	19:30:09
25	A It kind of looks like what the attachment	19:30:10

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1	was.	19:30:12
2	Q Okay. If it turns out not to be, then	19:30:13
3	it's going to be on me, not on you, how about	19:30:15
4	that? Is that fair?	19:30:18
5	A That's -- let's hope so.	19:30:18
6	Q And then the -- that same day, one of your	19:30:23
7	lawyers, Mr. Gottlieb, sent a letter to a number	19:30:33
8	of the people who are now defendants here,	19:30:41
9	correct?	19:30:43
10	ATTORNEY HUDSON: Objection.	19:30:44
11	ATTORNEY BABCOCK: Do you have those	19:30:50
12	Gottlieb letters? I believe it's going to be 1043	19:30:50
13	through 1045. Actually, one letter with some	19:31:05
14	attachments.	19:31:13
15	Maybe I got the wrong number. It's this	19:31:17
16	one.	19:31:21
17	(Exhibit 1042, marked for identification.)	19:31:21
18	BY ATTORNEY BABCOCK:	19:31:45
19	Q Let me hand you what's been marked as	19:31:45
20	1042, sorry. I stated the wrong number.	19:31:48
21	Have you ever seen this exhibit before?	19:32:15
22	It's -- it's sent on behalf of not only	19:32:19
23	Mr. Gottlieb but Ms. Hudson as well.	19:32:23
24	A I need to take a minute to look at it to	19:32:26
25	know if it looks familiar.	19:32:29

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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, ANITA M. TROMBETTA, RMR, CRR, and Certified
3 California Shorthand Reporter, the officer before
4 whom the foregoing deposition was taken, do hereby
5 certify that the foregoing transcript is a true
6 and correct record of the testimony given; that
7 said testimony was taken by me stenographically
8 and thereafter reduced to typewriting under my
9 direction; that reading and signing was requested
10 [or not requested, as appropriate]; and that I am
11 neither counsel for, related to, nor employed by
12 any of the parties to this case and have no
13 interest, financial or otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand and affixed my notarial seal this 31st day of
16 July, 2025.

17 My commission expires: 10.07.2025

18
19
20 
21 _____

22 Anita M. Trombetta, RMR, CRR
23
24
25