October 09, 2025

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

BLAKE LIVELY,)
3 PLAINTIFF,) CASE NO.
) 1:24-CV-10049-LJL
4 VS.) (CONSOLIDATED WITH
) 1:25-CV-00449-LJL
5 WAYFARER STUDIOS LLC,)
JUSTIN BALDONI, JAMEY)
6 HEATH, STEVE SAROWITZ,)
IT ENDS WITH US MOVIE)
7 LLC, MELISSA NATHAN,)
THE AGENCY GROUP PR)
8 LLC, JENNIFER ABEL, JED)
WALLACE, AND STREET)
9 RELATIONS INC.,)
DEFENDANTS.)
10 _____
JENNIFER ABEL,)
11 THIRD-PARTY)
PLAINTIFF,)
12)
VS.)
13)
JONESWORKS LLC,)
14 THIRD-PARTY)
DEFENDANT.)
15 _____
WAYFARER STUDIOS LLC,)
16 JUSTIN BALDONI, JAMEY)
HEATH, IT ENDS WITH US)
17 MOVIE LLC, MELISSA)
NATHAN, JENNIFER ABEL,)
18 AND STEVE SAROWITZ,)
CONSOLIDATED)
19 PLAINTIFFS,)
)
20 VS.)
)
21 BLAKE LIVELY, RYAN)
REYNOLDS, LESLIE)
22 SLOANE, VISION PR,)
INC., AND THE NEW YORK)
23 TIMES COMPANY,)
CONSOLIDATED)
24 DEFENDANTS.)
25

ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE

OCTOBER 9, 2025

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ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE, produced as a witness at the instance of the Blake Lively and duly sworn, was taken in the above styled and numbered cause on Thursday, October 9, 2025, from 9:14 a.m. to 7:36 p.m., before Janalyn Elkins, CSR, in and for the State of Texas, reported by computerized stenotype machine, at the offices of Jackson Walker, 100 Congress Avenue, Suite 1100, Austin, Texas, pursuant to the Federal Rules of Civil Procedure and any provisions stated on the record herein.

1 incorporation for Street Relations from California to
2 Texas in 2025?
3 A. We were now living in Texas.
4 Q. Okay. But you moved in 2021, right?
5 A. Yes.
6 Q. So why didn't you change it in 2021?
7 A. I don't recall.
8 Q. Okay. Do you have a -- a title at Street
9 Relations?
10 A. Founder is what I've used.
11 Q. Are there any other officers or directors of
12 Street Relations?
13 A. No.
14 Q. How would you describe the services that Street
15 Relations offers in the digital space?
16 A. Specifically in the digital space?
17 Q. Specifically in the digital space.
18 A. That would depend on the circumstances.
19 Q. Okay. Can you give me -- if you had to
20 describe your full range, Street Relations' full range
21 of capabilities in the digital space, how would you
22 describe that full range of capabilities?
23 A. Minimal.
24 Q. What do you mean minimal?
25 A. We don't do anything as far as action in the

1 digital space. It's an observant monitoring role.
2 Q. Okay. Is that what you would say to a client
3 who came to you and asked you to describe what you were
4 capable, what services Street Relations was capable of
5 performing in the digital space?
6 MR. BABCOCK: Objection.
7 THE WITNESS: Could you rephrase the
8 question?
9 Q. (BY MR. GOTTLIEB) You -- you said that
10 the -- Street Relations' full range of capabilities was
11 minimal and that you don't do anything as far as action
12 in the digital space, it's an observant monitoring role.
13 And my question was is that how you would describe your
14 services to a client that came to Street Relations
15 interested in engaging your services?
16 A. It depends on the client, the client in
17 question.
18 Q. So maybe and maybe not?
19 A. It depends on the situation.
20 Q. Okay. Let me try my question one more time.
21 MR. BABCOCK: Could you hang on for a
22 second?
23 Would you give a little space between his
24 question and your answer? Because I was going to object
25 to one, but you beat me to it.

[redacted]

[redacted]

about services on email?
A. Not that I recall.
Q. How about on text message?
A. Not -- could you be more specific?
Q. On any form of electronic communication? Let's broaden it up.
A. And the question did I have any communication with her about any types of services?
Q. That you might provide to Wayfarer Studios?
A. Yeah, we discussed monitoring.
Q. Okay. In what -- on what platform did you have that conversation with Ms. Nathan?
A. I -- I -- I wouldn't know because I didn't know the client or the details yet.
Q. Were you in -- I'm not talk -- sorry. Maybe my question was unclear. I wasn't talking about what platform for monitoring. I was talking about the platform that you used to communicate with Ms. Nathan about that. Was it Signal?
A. We've communicated through Signal and phone calls.
Q. By August 8th, 2024, had you communicated with Melissa -- Melissa Nathan on Signal?
A. Related to this?
Q. On anything?

A. Oh, yes.
Q. Okay. Did you also communicate with Ms. Nathan on the -- do you -- do you have an Apple iPhone?
A. I do.
Q. Okay. Did you also communicate with Ms. Nathan as of August 8th, 2024 on the Apple messaging app, the iMessaging app?
A. Ever before?
Q. Yes.
A. I believe so.
Q. Would you say as between those two messaging applications as of August 8th, 2024, with respect to your communications with Melissa Nathan, you used one of those applications more than the other?
A. I -- I would say yes, Signal.
Q. You used Signal more?
A. Uh-huh.
Q. When do you recall -- do you -- do you recall a point in time when you started to use Signal more than regular text messaging with Melissa Nathan?
A. No.
Q. Okay. At some point in time you did, though?
A. No, I need a more specific question.
Q. Okay. Do you see, back to the email, Ms. Nathan says, (Reading:) He is aware we're going for

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Q. Well, you say in the email, (Reading:) This was forwarded without attachments.

Right?

A. I do say that, but I don't recall.

Q. And -- okay. And you say, (Reading:) This is exactly the kind of content (in theory, until I read them) that our team can elevate.

Right?

A. I do say that.

Q. So you seem to be saying, and correct me if I'm wrong, but you seem to be saying that whatever this attachment or article was, you hadn't read it yet?

A. I -- I can't speak to that. I'm not sure.

Q. You don't remember if that's what you're saying here?

A. I don't remember, no.

Q. Well, nonetheless, whether you had read the article or not, you say, (Reading:) This is exactly the kind of content that our team can elevate across all algorithmically driven platforms.

Correct?

A. Yes.

Q. Was your team capable of elevating content across algorithmically driven platforms?

A. I don't have a team.

Q. Is Street Relations capable of elevating content across all algorithmically driven platforms?

A. Absolutely not.

Q. So you were being untruthful to [redacted] when you said that "our team can elevate across all algorithmically driven platforms"?

MR. COOLEY: Objection.

THE WITNESS: Yeah, not at all.

Q. (BY MR. GOTTLIEB) You were not at all being untruthful?

A. No.

Q. Okay. So Street Relations can't do that, right?

A. Correct.

Q. Okay. So who was your team capable of elevating across all algorithmically driven platforms?

A. If I'm referencing TAG, it would be whomever works for TAG to post stories.

Q. And you're saying you have no memory at all of what team you were referencing here?

A. No, I -- I think I said I'm referencing TAG as the team.

Q. Okay. So you think that TAG is capable of elevating content across all algorithmically driven platforms?

A. 100 percent.
Q. Okay. Who at TAG can do that?
MR. COOLEY: Objection.
THE WITNESS: To be specific, when you post a story or find a place for a story, you are elevating it across algorithmically driven platforms.
Q. (BY MR. GOTTLIEB) And so who at TAG was capable of posting or sharing stories creating content?
MR. COOLEY: Same.
THE WITNESS: I don't know specifically. That's their job, to create stories.
Q. (BY MR. GOTTLIEB) TAG's job is to create stories?
A. Yes. Or -- let me be specific with that. Is to help their clients get things posted as news stories, which would 100 percent elevate it across all algorithmically driven platforms.
Q. Okay. And -- and so you believe that when you were writing, (Reading:) So I can share with the teams and get it into the system, what you're talking about is sharing the content with TAG?
A. I do.
Q. And you believe the system is a reference to something that TAG has?
A. It's the system of posting or at least getting

content covered for their clients.

Q. Okay. And you recall the previous exhibit we looked at was on the 19th?

A. Uh-huh.

Q. At 7:29 p.m., and you said, (Reading:) Got that one in the system/on it?

A. Correct.

Q. So does it look like you followed through on what you said you would do here in Exhibit 10?

A. I don't recall what that is.

Q. Was this further help for [redacted]?

A. No. I didn't -- again, not engaged by [redacted]

Q. Well, sir, that was not my question. My question was, was this further help for [redacted] that you provided?

MR. COOLEY: Objection.

THE WITNESS: I can't answer that. I don't know.

Q. (BY MR. GOTTLIEB) Why? Why can't you answer that?

MR. COOLEY: Objection.

MR. BABCOCK: Same -- same objection.

THE WITNESS: I don't know if it helped him.

Q. (BY MR. GOTTLIEB) Did you believe you were providing him with help?

A. No.

Q. It's a very simple question -- no?

A. I believe that I was helping to share information.

Q. Is that not providing help?

A. It is.

Q. Okay. So if I want to ask you about whether you were formally engaged by someone from this point forward, I will be sure to ask formally engaged and specify my question. But can we agree if I ask you if you have helped someone, we're using the broad definition of help in any respect?

MR. BABCOCK: Objection.

MR. COOLEY: Join.

MR. BABCOCK: You don't need to make an agreement about that.

Q. (BY MR. GOTTLIEB) This is 11.

(Exhibit No. 11 was marked.)

Q. (BY MR. GOTTLIEB) Exhibit 11, sir, is a document bearing the Bates Nos. 3.0486 through .0488. This is a text chain. The date range is November 11th through November 14th, 2024. Appears to be between yourself, Ms. Nathan, Ms. Koslow, [redacted], and

VIDEOGRAPHER: Going off the record. The time is 12:29.

(Brief recess.)

VIDEOGRAPHER: Back on the record. The time is 1:34.

Q. (BY MR. GOTTLIEB) Hi, Mr. Wallace, back on the record. Hope you had a good lunch.

We were talking before about a period of time in October through November of 2024. We were looking at a bunch of messages. I think I asked you before about sort of, like, the recordkeeping that you have or that Street has for your work. If we wanted to recreate one of your days in that period of time after the fact, say, you know, mid-October, end of October 2024, would you have anything in terms of records other than, you know, your text messages, emails, and phone records?

A. Would I have anything other as records? Is that what you're asking? I'm sorry.

Q. Any information that you would have stored somewhere that would help us to recreate one of your days going back in time other than your -- what -- what is -- you have preserved in the form of text messages, whether Signal or Apple, emails, and phone records that show outgoing and incoming calls?

A. No.
Q. Do you keep --
A. Not that I'm aware of.
Q. I'm sorry.
A. Not that I'm aware of.
Q. Okay. Do you keep a calendar?
A. Yeah. There's -- there's a calendar of events.
Q. You -- you have a calendar personally?
A. Yeah. I mean, everyone has I on an iPhone.
Q. Okay. Do you ever put work calls or work meetings into your calendar on your iPhone?
A. Yes.
Q. Okay. And if you get invited to a Zoom or a Microsoft Teams meeting or something like that, that from time to time show up in your calendar on your iPhone?
MR. BABCOCK: Objection.
THE WITNESS: Yeah. If -- if someone sent me a link to that, you know, it just populates sometimes. You accept or deny.
Q. (BY MR. GOTTLIEB) All right. So sometimes you will have a -- depending on whether somebody sent you the invite to your -- your email or your -- otherwise sent you an invite that populates into your calendar?
A. I need to know more details.

[redacted]

a conversation in advance of her sending this message at 8:57 a.m.?

MR. BABCOCK: Objection.

MR. COOLEY: Join.

THE WITNESS: I don't recall.

Q. (BY MR. GOTTLIEB) Is it possible that before Ms. Nathan sent this statement of work at 8:57 a.m. that you and she discussed this statement of work?

MR. BABCOCK: Objection.

THE WITNESS: Yeah, I don't recall.

Q. (BY MR. GOTTLIEB) My question is just is it possible?

MR. BABCOCK: Objection. Sorry.

Q. (BY MR. GOTTLIEB) So -- that's a -- that's a yes or no --

MR. COOLEY: Join.

Q. (BY MR. GOTTLIEB) -- question?

A. Yeah, I don't think so.

Q. You don't think so. But do you know for certain that you and Melissa Nathan did not discuss the statement of work before she sent it at 8:57 a.m.?

MR. BABCOCK: Objection.

MR. COOLEY: Join.

THE WITNESS: We did not discuss the statement of work before she sent that.

Q. (BY MR. GOTTLIEB) You're certain of that as you sit here today?

A. As I recall.

Q. Okay. That's a different answer. So saying to the best of my recollection I don't recall discussing this is one answer. Saying that you're certain is another. So I'm just trying to discern the difference to understand your testimony?

A. We didn't have a discussion about the scope of work.

Q. Okay. And you're sure about that?

A. I'm sure about that.

Q. All right. Did you discuss it with her after she sent it?

A. I don't recall.

Q. Okay. So you might have discussed it with her after, but you're sure you didn't discuss it with her before?

A. Yeah, I don't recall.

Q. Do you see the next bullet down says, (Reading:) Use our team of specialists to build all the digital (Reddit, site, X, 4 Chan, discord, et cetera) messaging to trend and dominate in client's favor?

A. I do.

Q. Are you aware of any team of specialists that

exists that can do that?

A. I'm not.

Q. Is Melissa Nathan a technically sophisticated person?

MR. COOLEY: Objection.

MR. BABCOCK: Objection.

THE WITNESS: Yeah, I'd -- I'd need a more specific question.

Q. (BY MR. GOTTLIEB) Do you think Melissa Nathan understands, for example, the -- the concept of something being algorithmically weaponized?

MR. BABCOCK: Objection.

MR. COOLEY: Join.

THE WITNESS: I don't know.

Q. (BY MR. GOTTLIEB) Do you think she understands how to influence content on 4chan?

MR. BABCOCK: Objection.

MR. COOLEY: Objection.

THE WITNESS: I don't know.

Q. (BY MR. GOTTLIEB) Would it surprise you to learn in her testimony under oath in this case she testified that she doesn't even have social media?

MR. BABCOCK: Objection.

THE WITNESS: I -- I -- I don't -- I don't -- have no idea if that would surprise me or not.

It would be news.

Q. (BY MR. GOTTLIEB) Okay. But your testimony is you don't know anyone who could build all of the digital messaging from these platforms to trend and dominate in the client's favor; is that right?

MR. COOLEY: Objection.

THE WITNESS: Correct.

Q. (BY MR. GOTTLIEB) And you can't do that personally?

A. I cannot.

Q. Okay. So assuming that Melissa Nathan is also not capable of doing this personally, given your testimony that you can't do it personally and you don't know anybody who can do this personally, is this a truthful representation of the statement of work that you, TAG, and Bryan Freedman could provide?

MR. BABCOCK: Objection.

MR. COOLEY: Objection.

THE WITNESS: I -- I have no idea what some of these things are.

Q. (BY MR. GOTTLIEB) So -- so no, this would not be a truthful and accurate representation of a service that collectively, you, Melissa Nathan, and Bryan Freedman could provide?

MR. BABCOCK: Objection.

MR. COOLEY: Objection.
THE WITNESS: Not from my perspective.
Q. (BY MR. GOTTLIEB) Why do you think Melissa Nathan repeatedly sends out statements of work that represent digital services that you can't provide?
MR. BABCOCK: Objection.
MR. COOLEY: Objection.
THE WITNESS: Can you repeat that question?
Q. (BY MR. GOTTLIEB) Why do you think Melissa Nathan repeatedly sends out statements of work to clients referencing digital services that you are not capable of providing?
MR. BABCOCK: Objection.
MR. COOLEY: Same.
THE WITNESS: I have no idea.
Q. (BY MR. GOTTLIEB) Does it concern you?
MR. BABCOCK: Objection.
THE WITNESS: I -- I don't know enough about it --
Q. (BY MR. GOTTLIEB) As you sit here today --
A. -- that it concerns me.
Q. Sorry. I didn't mean to interrupt.
As you sit here today, we've now looked at a few of these, right?
A. Uh-huh.

Q. Okay. And I'm just asking you as a businessman who runs his own business, who has a representation, does it bother you at all that you are being held out to provide services that you are sitting here telling me under oath not only can you not provide them you don't even know what they are?

MR. BABCOCK: Objection.

MR. COOLEY: Objection.

Q. (BY MR. GOTTLIEB) Does that bother you?

MR. BABCOCK: Same objection.

MR. COOLEY: Objection.

THE WITNESS: I don't know that she's talking about me.

Q. (BY MR. GOTTLIEB) Okay. If she's talking about you, if her testimony is in providing description of digital services she was talking about you and Street Relations, then would it bother you?

MR. BABCOCK: Objection.

MR. COOLEY: Objection.

THE WITNESS: I don't have enough details there.

Q. (BY MR. GOTTLIEB) Would you want to keep working with somebody who's making misrepresentations to clients about what you can do?

MR. COOLEY: Objection.

[redacted]

[redacted]

(Exhibit No. 18 was marked.)

Q. (BY MR. GOTTLIEB) This is Exhibit 18. And Mr. Wallace, you've been handed a document marked as Exhibit 18 bearing the Bates Nos. Street 3.0348 through 0355. And let me know once you've had a chance to look through it.

A. Okay.

Q. You've had a chance to look through Exhibit 18?

A. I have.

Q. And Exhibit 18 is an email exchange be an attachment that involves you, a number of people from TAG, and someone from [redacted]; is that right?

A. Yes.

Q. Is [redacted] a client that you did any work for around this time?

A. They were a client of TAG's.

Q. Okay. A client of TAG's. Did you or Street do any work for them in connection with TAG's services?

A. I had a few consulting calls with them.

Q. Okay. And this August -- this is August 3rd, 2024. Is that around the same time that you began working for -- performing the work that you did on behalf of Wayfarer Studios?

A. No. It was later for Wayfarer.

Q. A few days later?

A. August 9th.

Q. This was around the same time that you began talking to Ms. Nathan about Mr. Baldoni and Wayfarer; is that right?

A. I don't recall.

Q. Okay. At most, then, I think what you're saying it was six days apart from when you were engaged?

A. According to this date, yes.

Q. Okay. And there is a scope of work for [redacted] that is attached to the end of this email chain; is that right?

A. Yes.

Q. And [redacted] -- oh, lost your microphone.

A. My bad.

Q. No worries.

Am I right that [redacted]

A. Yes.

Q. Okay. And at 8:28 p.m. on Friday, August 2nd, you reply to the introduction that [redacted] has sent; is that right?

A. Yes.

Q. [redacted] I'm sorry for the circumstances but happy to connect and help build a solution.

Do you see that?

A. I do.

Q. And you say, (Reading:) I see the date of the article and have my forensic team building a quick report on the sentiment and how it engages so we can discuss all the paths to solve.

Do you see that?

A. I do see.

Q. Who is your forensic team you were referring to here?

A. I don't have one.

Q. Who were you referring to when you wrote "my forensic team"?

A. I don't recall.

Q. Do you think you had someone out there that was building a quick report on the sentiment?

A. No, not at this point.

Q. Do you think you asked anyone whether human, AI, or otherwise to build a sentiment report at this

point in time?

A. I did not.

Q. So this was a misrepresentation that you made to [redacted]

A. It was forward thinking before I looked into the case.

Q. I'm not sure I understand what you're saying?

A. I hadn't had a chance to review. I was going to review myself first.

Q. Okay. So you didn't yet have anyone building a quick report. But what you're telling me, I think, is that your intention was to prepare some kind of a sentiment report?

A. I don't know enough details. I don't recall.

Q. Okay. But you certainly recall that it was not correct that you had a forensic team at that time building a quick report on the sentiment?

A. Correct.

Q. Then you ask if you can connect on Monday, right?

A. Yes.

Q. Then you say, (Reading:) I'd like to introduce you to my crisis comms specialist that focuses on diversity and culture, Melissa Nathan.

Do you see that?

A. I do.
Q. Does Melissa Nathan focus on diversity and culture?
A. Among other things. She's very good with that.
Q. Does she focus on diversity and culture more than she focuses on entertainment?
MR. COOLEY: Objection.
THE WITNESS: I don't know that those are different.
Q. (BY MR. GOTTLIEB) Are they the same in your view?
A. Could be.
Q. You say, (Reading:) Melissa and/or her team can connect with you today so we can get their perspective. Let me know if you're open to that; I can get their feedback team, my forensic team's results, and then we can connect on Monday.
Do you see that?
A. I do.
Q. But you had no intention of getting your forensic team's results by Monday. Is that what I understand you to be saying?
A. I need more details.
Q. Why do you need more details than what you wrote?

A. I -- I don't recall exactly.

Q. Well, I mean, how often do you tell people that you have some team working on something, when it's not true?

A. It's puffery.

Q. This is puffery? Okay.

You say, (Reading:) Either way this is our wheelhouse and I'm happy to discuss.

Do you see that?

A. I do.

Q. What are you trying to convey when you tell somebody "this is our wheelhouse"?

A. It's crisis management.

Q. And you're trying to convey to [redacted] that the problem she's facing is in the wheelhouse of you and Ms. Nathan, right?

A. I don't know specifically. Crisis management is the wheelhouse.

Q. But you're not talking about crisis management generally to [redacted], right? You're talking about the problems she's facing?

A. We don't know the details yet.

Q. So you were saying then that all crisis management is in your wheelhouse?

A. I don't know exactly what there -- what's being

[redacted]

the Texas case. In fact, Ms. Lively has prevented us from taking discovery in the Texas case. So if -- if your questions are limited to the New York case where the accusations are clear about what she's alleging, I'll let him answer. But I don't want him answering questions about the Texas case.

MR. GOTTLIEB: Well, as you recall in Ms. Lively's deposition, you, in your limited time, and it was limited, asked her questions about the Texas 202 position, correct?

MR. BABCOCK: Well, I asked her what I asked her.

MR. GOTTLIEB: Okay.

MR. BABCOCK: But I wasn't asking her about the Texas case.

Q. (BY MR. GOTTLIEB) I'm not asking you specifically about allegations in your Texas complaint. Okay?

A. Okay.

Q. But at any point in time, perhaps other than your allegations in your Texas complaint, have you ever claimed or alleged that Ms. Lively fabricated her allegations of sexual harassment?

A. Not that I recall.

Q. Has -- have you ever had, to your knowledge, a

1 Q. Okay. At any point in time, did you gain that
2 understanding?
3 A. As I said, he's my lawyer since 2020. That was
4 my first phone call. We were trying to process what it
5 meant.
6 Q. All right. Did you understand when you
7 received this email and the attached cease and desist
8 letter that you were required to preserve all documents
9 concerning Ms. Lively's sexual harassment allegations
10 against Mr. Baldoni and other Wayfarer parties?
11 MR. BABCOCK: I don't need to say this, but
12 exclude conversations with a -- your lawyer. Lawyers.
13 THE WITNESS: Yes.
14 Ask the question again, I'm sorry.
15 Q. (BY MR. GOTTLIEB) Did you understand that this
16 letter required you to preserve all documents concerning
17 Ms. Lively's sexual harassment allegations against
18 Mr. Baldoni and other Wayfarer parties?
19 A. I did.
20 Q. And did you understand that the document or
21 the -- sorry. Did you understand that you were required
22 to preserve all documents concerning Ms. Lively's
23 retaliation allegation against the Wayfarer parties?
24 A. I did.
25 Q. Did you understand that preservation

1 requirement to extend to electronically stored
2 information?
3 A. Yes.
4 Q. And you saw the long description of
5 electronically stored information in this letter as you
6 were reviewing it?
7 A. I did.
8 Q. You saw that that included things like WhatsApp
9 and Signal?
10 A. I did.
11 Q. And emails and text messages?
12 A. Yes.
13 Q. Okay. What steps did you take, and I don't
14 want to know about conversations that you had with your
15 counsel. But what steps, if any, did you personally
16 take to preserve documents after receiving this letter?
17 A. I called my lawyer.
18 Q. Okay. Apart from talking to your attorneys,
19 which I will not ask you about, did you take any steps
20 personally to engage in document preservation for your
21 devices?
22 A. I did what they suggested.
23 Q. Okay. Did you -- did you personally go into
24 your phone and change any settings, retention settings
25 on your Signal app after receiving this letter?

A. I don't recall doing that.
Q. Okay. Do -- do you recall examining the retention settings on the Street Relations email accounts?
A. I don't recall.
Q. Do you -- do you know one way or the other whether the Street Relations email account have retention settings on them?
A. Yeah, they retain everything --
Q. For how long?
A. -- from my understanding. I don't recall.
Q. Okay. So you don't know if that's indefinite or for some period of time?
A. I don't as we sit here.
Q. Okay. Do you recall going into your WhatsApp account and changing any settings in that?
A. I don't recall.
Q. And how about in iMessage, do you recall looking at any settings that you might have had with respect to data retention on the cloud for -- for Apple or for your device with Apple?
A. I don't recall.
Q. You, from time to time, use the -- the voice note feature; is that right?
A. Yes.

Q. And am I right that the voice note feature is configured in a way on Apple devices where voice notes will not automatically be saved to devices?

A. I -- I don't know the specifics.

Q. Okay.

A. What's the question again, what you're asking?

Q. Do you know if on your device, the -- the voice notes that you send or receive are automatically saved to your device or whether you have to save them yourself?

A. I -- I don't know offhand.

Q. Okay. So you don't know one way or the other whether, for example, if you send a voice note to someone in the context of a text thread whether that is saved, that being the voice note, along with the text thread?

A. I'd need to know more specifics.

Q. Okay. But you don't know, right?

A. I -- not offhand.

Q. Okay. Apart from your Street Relations email, do you use any other email account?

A. There's a Mac address.

Q. Okay.

A. Nothing for business.

Q. Have you ever received or sent, whether

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

THE WITNESS: Yeah, I -- I -- I don't -- I don't recall.

Q. (BY MR. GOTTLIEB) So you can't rule it out?

MR. COOLEY: Objection.

THE WITNESS: I -- I need to know more details.

Q. (BY MR. GOTTLIEB) You've got to answer my question, sir. It's a yes or no question. Can you rule out the possibility that you were on a Signal chain with Katie Case and Melissa Nathan as this -- on the date of this message here, August 8th, 2024?

MR. COOLEY: Same objection.

MR. BABCOCK: Me too.

THE WITNESS: Yeah, I -- I don't know what indicates this is a Signal message, so I'd need to know more information.

Q. (BY MR. GOTTLIEB) Okay. You were communicating with people at TAG by this time in August of 2024, right, on Signal?

A. Sure, yes.

Q. Including Melissa Nathan?

A. Correct.

Q. Okay. And you just don't recall whether this is among the Signal messages that -- or Signal chains that you were on?

1 interested in the outcome of the action.
2 Certified to by me this 10th day of October
3 2025.
4
5

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OCTOBER 10, 2025

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY, PLAINTIFF	)	CASE NO. 1:24-CV-10049-LJL (CONSOLIDATED WITH 1:25-CV-00449-LJL
VS.	)	
WAYFARER STUDIOS LLC, JUSTIN BALDONI, JAMEY HEATH, STEVE SAROWITZ, IT ENDS WITH US MOVIE LLC, MELISSA NATHAN, THE AGENCY GROUP PR LLC, AND JENNIFER ABEL, DEFENDANTS	)	
_____	)	_____
JENNIFER ABEL, THIRD-PARTY PLAINTIFF	)	
VS.	)	
JONESWORKS LLC THIRD-PARTY DEFENDANT	)	

ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE
OCTOBER 10
CONFIDENTIAL

ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE, produced as a witness at the instance of the Jonesworks and duly sworn, was taken in the above styled and numbered cause on Friday, October 10, 2025, from 9:06 a.m. to 2:25 p.m., before Janalyn Elkins, CSR, in and for the State of Texas, reported by computerized stenotype machine, at the offices of Jackson Walker, 100 Congress Avenue, Suite 1100, Austin, Texas, pursuant to the Federal Rules of Civil Procedure and any provisions stated on the record herein.

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2 MAGGIE KANE (Concierge)
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EXHIBITS

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1 VIDEOGRAPHER: Good morning. We are going
2 on the record at 9:06 a.m. Central Standard Time on
3 October 10, 2025. This is Media Unit 1 of the
4 video-recorded deposition of Jed Wallace taken by
5 counsel for the Plaintiff in the matter of Stephanie
6 Jones, et al. versus Jennifer Abel, et al. Filed in the
7 United States District Court for the Southern District
8 of New York, Case No. 125-CV-00779-LJL. The location of
9 the deposition is 100 Congress Avenue, Austin, Texas.
10 My name is Timothy Desadier representing Veritext, and I
11 am the videographer. The court reporter is Janalyn
12 Elkins from the firm Veritext.
13 Counsel and all present will now state
14 their appearances and affiliations for the record,
15 beginning with the noticing attorney.
16 MS. TAHLER: Kristin Tahler from Quinn
17 Emanuel for Stephanie Jones and Jonesworks.
18 MS. ANASTASIO: Morgan Anastasio, Quinn
19 Emanuel for the same.
20 MR. GOTTLIEB: Mike Gottlieb from Willkie
21 Farr & Gallagher on behalf of Ms. Lively.
22 MS. TAUSTINE: Melissa Taustine from
23 Willkie Farr & Gallagher on behalf of Blake Lively.
24 MS. PRATHER: Laura Prather, Haynes & Boone
25 on behalf of Ms. Lively.

MR. COOLEY: Miles Cooley and Theresa Troupson, Liner Freedman Taitelman + Cooley on behalf of the Wayfarer Defendants.

MR. BABCOCK: Chip Babcock with Jackson Walker on behalf of the witness.

JED WALLACE,

having been duly sworn, testified as follows:

MR. BABCOCK: Kristin, do we want this confidential or do you care?

MS. TAHLER: Yeah, no, I think -- I think we should designate it confidential.

MR. BABCOCK: Okay. And -- and I believe there's an -- an agreement that the deposition will last no longer than four hours.

MS. TAHLER: Yes, there's that agreement.

MR. BABCOCK: Okay.

MS. TAHLER: And there may be moments of AEO, but it doesn't look like that's going to be an issue today, because I don't think we have any clients on.

MR. BABCOCK: Great. Perfect.

EXAMINATION

Q. (BY MS. TAHLER) All right. Good morning, Mr. Wallace.

A. Good morning.

Q. My name is Kristin Tahler. I represent Stephanie Jones and Jonesworks in this. Is your full name, sir, Jed Avery Wallace?

A. It is.

Q. And you understand that today, you're under oath just as you were yesterday, right?

A. I do.

Q. And you're required to give full and truthful testimony?

A. I do.

Q. Is there any reason that you can't give full and truthful testimony today?

A. No.

Q. Is there anything that would impede your ability to recall past events?

A. No.

Q. So the same rules apply as of -- as yesterday, so I'm not going to go through that in detail with you, but just a couple of things. One, if you -- if I ask a question and you don't understand, please ask for clarification. Otherwise, I'm going to assume that you understood it.

A. Okay.

Q. Okay? And then the second, and you did a great job with this yesterday, so I don't think it will be a

1 privileged.
2 Q. (BY MS. TAHLER) Let's -- what about [redacted]
3 [redacted]? Did you ever do any work with Mr. Freedman in
4 connection with [redacted]?
5 MR. COOLEY: Objection.
6 THE WITNESS: Not that I recall.
7 Q. (BY MS. TAHLER) You don't recall one way or
8 another?
9 A. I don't recall.
10 Q. What about with [redacted] did you do any work with
11 Mr. Freedman in connection with [redacted]?
12 MR. COOLEY: Objection.
13 THE WITNESS: Not that I recall.
14 Q. (BY MS. TAHLER) What about [redacted]?
15 MR. COOLEY: Is there -- is there a
16 question? What about him?
17 Q. (BY MS. TAHLER) Did you do any work with
18 Mr. Freedman in connection with [redacted]?
19 MR. COOLEY: Objection.
20 THE WITNESS: No.
21 Q. (BY MS. TAHLER) Are you familiar with [redacted]
[redacted]?
23 MR. COOLEY: Objection.
24 THE WITNESS: In my -- the actor?
25 Q. (BY MS. TAHLER) Yes.

A. Yes.
Q. Did you do any work with Mr. Freedman in connection with Dwayne Johnson?
MR. COOLEY: Objection.
THE WITNESS: No.
Q. (BY MS. TAHLER) Mr. Wallace, who is paying your legal fees in connection with this matter?
A. That would be Wayfarer.
Q. Do you have an indemnification agreement with them?
MR. COOLEY: Objection.
THE WITNESS: I'm not aware of anything like that.
Q. (BY MS. TAHLER) You're not aware of any agreement you have with Wayfarer?
MR. COOLEY: Objection.
THE WITNESS: I'm not.
Q. (BY MS. TAHLER) Are you being paid for any consulting services in connection with this matter?
A. No.
Q. Are you being compensated at all for your time as an expert in connection with this matter?
A. Not whatsoever.
Q. Mr. Wallace, what is your preferred method of communication for work?

1 A. Like this, I'm talking.
2 Q. When you are writing someone, what is your
3 preferred method of communication?
4 A. Depends on the circumstances.
5 Q. Would you say that most of your communications
6 that are work related are via Signal?
7 A. It depends on the circumstances. I can't say
8 that.
9 Q. In what circumstances would Signal be your
10 preferred method of communication?
11 MR. BABCOCK: Objection.
12 MR. COOLEY: Join.
13 THE WITNESS: Could you -- could you
14 rephrase that question?
15 Q. (BY MS. TAHLER) Well, you just said it depends
16 on the circumstances that would dictate the type of
17 communication you were -- or the way that you were
18 communicating. And I'm wondering in what circumstances,
19 picking up on your answer, you would want to use Signal?
20 A. Yeah, I can't speak to that right now without
21 more details. I'm not certain.
22 Q. Are there particular circumstances that are in
23 your mind right now that you would want to have a
24 conversation on Signal with respect to your work?
25 MR. COOLEY: Objection.

1 THE WITNESS: Not in particular.
2 Q. (BY MS. TAHLER) From time to time, you ask
3 people to switch over to Signal; isn't that right?
4 MR. COOLEY: Objection.
5 THE WITNESS: I mean, I'd have to know more
6 details.
7 Q. (BY MS. TAHLER) Do you have any recollection
8 of having a conversation with people and asking to
9 switch over to Signal?
10 A. I -- could you rephrase that question?
11 Q. Yeah. Do you have any recollection of being on
12 a text chain or an email chain with a group of people
13 and asking to switch over to communication via Signal?
14 A. Not specifically.
15 Q. We're going to look at an exhibit that we
16 looked at yesterday, which is AEO, but...
17 MR. BABCOCK: Do we need to go AEO?
18 MS. TAHLER: Yes.
19 MR. BABCOCK: How do we do that?
20 MS. TAHLER: I think we don't need to right
21 now because there's nobody -- we'll just mark it AEO in
22 the transcript.
23 MR. BABCOCK: Okay.
24 MS. ANASTASIO: Janalyn, do you have the
25 exhibit copies from yesterday?

1 Katie Case?
2 A. I don't recall.
3 Q. Was it within the last year?
4 A. No.
5 Q. Within the last five years?
6 A. Yeah, I don't recall.
7 Q. About how many times do you recall
8 communicating with Katie Case?
9 A. I -- I have no idea.
10 Q. Did you work with Katie Case in connection with
11 work that you did for Rebel Wilson?
12 A. Not that I recall.
13 Q. Do you recall Katie Case having any involvement
14 in work that you did for Rebel Wilson?
15 A. Not that I recall.
16 Q. Is it possible?
17 A. I'd need more details. I'm not certain.
18 Q. What about the Alexander Brothers, did Katie
19 Case have any -- did you do any work related to the
20 Alexander Brothers with Katie Case?
21 MR. COOLEY: Objection.
22 THE WITNESS: Yeah, not that I recall.
23 Q. (BY MS. TAHLER) Do you recall being on a
24 Signal chat with Katie Case and Melissa Nathan in August
25 of 2024?

if requested?

MR. COOLEY: Objection.

THE WITNESS: I -- I cannot do that.

Q. (BY MS. TAHLER) Do you know people who can do that?

MR. COOLEY: Objection.

THE WITNESS: Not that I recall.

Q. (BY MS. TAHLER) We're going to mark a couple of exhibits now, so bear with me while we go through that.

A. Okay.

MS. ANASTASIO: We're at 41.

THE REPORTER: 42.

MS. ANASTASIO: 42. So this will be 42.

(Exhibit Nos. 42-46 were marked.)

Q. (BY MS. TAHLER) Mr. Wallace, you've been handed several exhibits. Before we get into the details of the exhibits, are you familiar generally that in May 2024, a website and a number of social media accounts that were unfavorable to Stephanie Jones appeared online?

A. I don't know the specifics, but I've heard that.

Q. Where did you hear that from?

A. I believe the lawsuit. And early on, a

conversation with Stephanie.

Q. You've been handed a printout of the website that I'm referring to, a second website that was put up, and then a Twitter account, a Facebook account, and a Pinterest account, all that link back to that website.

Have you seen these documents before online?

A. Can -- can I read through them?

Q. Yeah. I'm not going to ask you detailed questions about the website, so you don't have to --

A. Okay.

Q. -- read the whole thing. But if you want to familiarize yourself.

A. Okay. Thanks.

Q. Mr. Wallace, you've just reviewed Exhibits 42 through 46, which are a series of websites and negative social media accounts about Stephanie Jones.

Have you seen these documents online before today?

A. I did see this website.

Q. You did see Exhibit 42?

A. I believe so.

Q. When did you see Exhibit 42?

A. I don't recall.

Q. Were you involved in the creation of

1 Exhibit 42?
2 A. No.
3 Q. Were you involved at all in getting Exhibit 42
4 online?
5 A. No.
6 Q. Were you involved at all in the copy that is
7 drafted for Exhibit 42?
8 A. No.
9 Q. Did you contribute to its existence in any way?
10 A. No.
11 Q. We've discussed Katie Case earlier,
12 Mr. Wallace. Are you aware that Katie Case testified in
13 this matter?
14 A. I don't know the specifics. I'm aware she
15 testified.
16 Q. Have you reviewed her testimony?
17 A. I have not.
18 Q. You understand Ms. Case testified under oath
19 under penalty of perjury, do you?
20 A. Okay, yeah.
21 Q. Like you are today?
22 A. Yes.
23 Q. And I will represent to you -- were you on a
24 Signal chat with Ms. Case and Ms. Nathan in 2024, in May
25 of 2024?

(Brief recess.)

VIDEOGRAPHER: Back on the record. Time is 10:08.

Q. (BY MS. TAHLER) Mr. Wallace, when we broke, we were looking at a series of websites and social media accounts related to Ms. Jones. Could you look at what's been marked as Exhibit 44?

A. Yes.

Q. Exhibit 44 is a series of tweets related to the stephaniejonesleaks website.

Do you see that?

A. Tweets or accounts?

Q. Accounts. Apologies.

A. Yes.

Q. Did you have any involvement of any tweets that went into this -- that were posted onto any of those accounts?

MR. COOLEY: Objection, form.

THE WITNESS: Yeah, I did not.

Q. (BY MS. TAHLER) Ms. Case testified that she drafted tweets about Ms. Jones and posted to one of those sites. Are you aware of that?

A. I am not.

Q. Did you have any involvement with Ms. Case in tweets that were posted to any of those accounts?

1 A. I did not.
2 Q. I'll represent to you that Katie Case testified
3 that she spoke with you in connection with the tweets.
4 Does that refresh any recollection that you worked with
5 Ms. Case in connection with tweets that were posted to
6 any of the accounts in Exhibit 44?
7 MR. BABCOCK: Objection.
8 THE WITNESS: It does not.
9 Q. (BY MS. TAHLER) Mr. Wallace, are you -- is it
10 your testimony today that if Katie Case testified under
11 oath that she spoke to you in connection with tweets
12 that were posted to one of the accounts in Exhibit 44
13 that Ms. Case gave false under-oath testimony?
14 MR. BABCOCK: Objection.
15 THE WITNESS: Yeah, I have no idea what her
16 testimony was.
17 MR. COOLEY: Same.
18 THE WITNESS: Can't answer that.
19 Q. (BY MS. TAHLER) I'm representing to you that
20 Ms. Case testified that she worked with you in
21 connection with tweets that were posted to one of the
22 accounts at Exhibit 44. And I'm asking you if it is
23 your testimony that Ms. Case testified about that
24 falsely?
25 MR. BABCOCK: Objection.

1 MR. COOLEY: Same.
2 THE WITNESS: I can't speak to that.
3 Q. (BY MS. TAHLER) So Ms. Case's testimony could
4 be accurate; is that right?
5 MR. BABCOCK: Objection.
6 MR. COOLEY: Same.
7 THE WITNESS: I can't answer that.
8 Q. (BY MS. TAHLER) It's possible that Ms. Case
9 spoke to you about tweets that were posted to one of the
10 accounts in Exhibit 44?
11 A. I don't recall.
12 Q. So it's possible?
13 A. I can't answer that.
14 Q. You can answer yes or no if it's possible.
15 MR. BABCOCK: Objection.
16 THE WITNESS: I -- I don't --
17 MR. COOLEY: Joining.
18 THE WITNESS: -- have all the details. I'm
19 not certain how to answer that.
20 Q. (BY MS. TAHLER) There are no more details to
21 give. I'm simply asking you yes or no. Is it possible
22 that Katie Case spoke to you about tweets that were
23 posted to one of the accounts in Exhibit 44?
24 MR. COOLEY: Objection.
25 MR. BABCOCK: Same objection.

A. It related to Rebel's claims or related to, you know, her -- the -- her claims on set, I believe.

Q. Rebel's claims on set?

A. I -- Rebel's claims. Let's leave it at that.

Q. Rebel's claims on set of the movie The Deb?

A. I -- I don't recall.

Q. Were Rebel's claims outrageous?

A. I -- I don't recall.

Q. When was this article?

A. I have no idea.

Q. Do you recall whether this discussion was sometime in 2024?

A. I don't know exactly.

Q. We're going to mark 51.

(Exhibit No. 51 was marked.)

MR. BABCOCK: Thank you.

Q. (BY MS. TAHLER) Mr. Wallace, you'll -- you're now marking -- strike that.

You're now reviewing what's been marked as Exhibit 42. It is a --

MR. BABCOCK: 51.

Q. (BY MS. TAHLER) 51, sorry. Exhibit 51, what is a website appearing at amandaghostsucks.com.

MR. BABCOCK: Catchy.

Q. (BY MS. TAHLER) Mr. Wallace, do you recognize

this website?

A. I do not. Let me read through it, please. Okay.

Q. Mr. Wallace, do you recognize Tab 51 -- or strike that. Excuse me. Exhibit 51?

A. Yeah. I -- I -- I don't recognize it.

Q. Have you ever seen the -- Exhibit 51 before?

A. The website, I have not seen.

Q. Anything else contained in Exhibit 51 that you've seen before?

A. I can't answer that without really digging in. But I don't recall.

Q. I'm just wondering why you clarified the website in your previous answer.

A. Yeah, I mean, just reading through the first page, I saw some of the content.

Q. And have you seen some of the content before?

A. Seems like it's similar to the Daily Mail article.

Q. Other than the Daily Mail article, do you have any recollection of seeing any of the content before?

A. No. Maybe on social media. I'm not certain.

Q. Do you have any recollection of discussing any of the content contained in Exhibit 51 before?

A. I got to dig deeper into the content. I don't

1 Q. (BY MS. TAHLER) You're not certain whether or
2 not a website amandaghostsucks and a website
3 stephaniejonesleaks are similar?
4 MR. COOLEY: Objection.
5 MR. BABCOCK: Objection.
6 THE WITNESS: Yeah, I -- I don't know.
7 That's a broad statement. They both have URL addresses.
8 Q. (BY MS. TAHLER) Okay. Mr. Wallace, Katie Case
9 wrote the copy for Exhibit 51; isn't that right?
10 A. I don't know.
11 Q. Sitting here today, do you believe it's
12 possible that Ms. Case wrote the copy for Exhibit 41?
13 MR. COOLEY: Objection.
14 MR. BABCOCK: Objection.
15 THE WITNESS: Yeah, I can't speak to that.
16 I'm not sure.
17 Q. (BY MS. TAHLER) And you were involved in
18 creating Exhibit 51 as well; isn't that right?
19 A. That is not right.
20 Q. You had no involvement in Exhibit 51?
21 MR. COOLEY: I'm sorry. One second.
22 Objection.
23 THE WITNESS: Could you repeat the
24 question, please?
25 Q. (BY MS. TAHLER) Yes. Did you have any

1 involvement in what came to be Exhibit 51?
2 MR. COOLEY: Objection.
3 THE WITNESS: I did not.
4 Q. (BY MS. TAHLER) Did you have any discussions
5 with anyone related to what would become Exhibit 51?
6 MR. COOLEY: Objection.
7 THE WITNESS: Not that I recall.
8 Q. (BY MS. TAHLER) Did you ever discuss
9 Exhibit 51 with Ms. Nathan?
10 A. Not that I recall.
11 Q. What about Roza Kalantari?
12 A. Not that I recall.
13 MS. ANASTASIO: This will be 52.
14 (Exhibit No. 52 was marked.)
15 Q. (BY MS. TAHLER) Mr. Wallace, you are now
16 reviewing what's been marked as KCase-several zeros-4949
17 through 4962. This is a communication, sir, between
18 Ms. Case and Ms. Nathan. You are not on the
19 communication, but you are referenced in it. So if
20 you'd like to review it, I'm going to have some
21 questions.
22 A. Okay.
23 Q. Mr. Wallace, have you ever seen Exhibit 52
24 before today?
25 A. What exhibit? The entire exhibit?

1 THE WITNESS: Yeah, I do not -- I do not
2 understand that.
3 Q. (BY MS. TAHLER) Do you recall looking at
4 similar websites with respect to Ms. Jones?
5 MR. COOLEY: Objection.
6 THE WITNESS: In the earlier exhibits that
7 you shared?
8 Q. (BY MS. TAHLER) Yes.
9 A. I -- I recall that.
10 Q. Okay. Mr. Wallace, we've already discussed a
11 little bit, but who are the Alexander Brothers?
12 A. Can you be more specific?
13 Q. Do you know who the Alexander Brothers are?
14 A. Related to what?
15 Q. Do you know who Tal Alexander is?
16 A. Oh, the -- yeah, I know who the Alexander
17 Brothers are.
18 Q. Who are the Alexander Brothers?
19 A. Real estate agents, as I understand it.
20 Q. Were the Alexander Brothers ever your clients?
21 A. Not my clients.
22 Q. Did you ever do any type of work on their
23 behalf?
24 A. Not that I recall.
25 Q. So it's possible that you did work on their

1 behalf?
2 A. No, I don't know. I can't answer one way or
3 the other. I don't recall.
4 Q. And I'm just asking yes or no. Is it possible
5 that you did some sort of work on their behalf?
6 MR. BABCOCK: Objection.
7 MR. COOLEY: Join.
8 THE WITNESS: Yeah, I -- I can't answer
9 that. I'm not certain.
10 Q. (BY MS. TAHLER) Mr. Wallace, did you work on a
11 website related to the Alexander Brothers?
12 A. I did not.
13 MS. ANASTASIO: 63.
14 (Exhibit No. 63 was marked.)
15 MS. ANASTASIO: This will be 63.
16 Q. (BY MS. TAHLER) Mr. Wallace, you're now
17 reviewing what's been marked as Exhibit 63. It is a
18 website available at alexanderbrothersextorted.com.
19 Do you see that?
20 A. Yeah, I'm reviewing now.
21 Q. I'm not going to ask you any detailed questions
22 about it, sir.
23 A. Okay, yeah.
24 Q. Mr. Wallace, are you aware that this website
25 came online around August 22nd, 2024?

1 A. I am not.
2 Q. At the time, the -- the Alexander Brothers were
3 being accused of sexual misconduct. Are you aware of
4 that?
5 A. I'm not aware of their story.
6 Q. Are you aware whether or not Katie Case had any
7 role in drafting the copy for this website?
8 A. I don't know that.
9 Q. Katie Case testified under oath that she
10 performed work in connection with the Alexander Brothers
11 with you and Melissa Nathan -- Nathan. Does that
12 refresh your recollection that you did some work in
13 connection with the Alexander Brothers in connection
14 with Ms. Case?
15 MR. BABCOCK: Objection.
16 MR. COOLEY: Join.
17 THE WITNESS: Yeah, it does not.
18 Q. (BY MS. TAHLER) Do you recall doing any work
19 for the Alexander Brothers with Ms. Case?
20 A. I don't recall.
21 Q. Do you have any basis to dispute Ms. Case's
22 under-oath testimony?
23 MR. BABCOCK: Objection.
24 MR. COOLEY: Objection.
25 THE WITNESS: Yeah, I can't do that. Same

1 as earlier answers, not one way or the other.
2 Q. (BY MS. TAHLER) Sitting here today, do you
3 have any basis to dispute Ms. Case's under-oath
4 testimony?
5 MR. COOLEY: Same objection.
6 MR. BABCOCK: Objection.
7 THE WITNESS: I -- I don't know what her
8 testimony was, nor do I have any basis to answer that
9 question.
10 Q. (BY MS. TAHLER) I'm just telling you -- I'm
11 representing to you that Ms. Case testified that she
12 performed work related to the Alexander Brothers with
13 you and Melissa. And I'm asking yes or no. Do you have
14 any basis to dispute that under-oath testimony?
15 MR. BABCOCK: Object to the question.
16 MR. COOLEY: Same.
17 THE WITNESS: Yeah, I can't answer that. I
18 don't have all the circumstances.
19 Q. (BY MS. TAHLER) Can you tell me what
20 circumstances you would need?
21 MR. BABCOCK: Objection.
22 MR. COOLEY: Join.
23 THE WITNESS: No, I can't.
24 Q. (BY MS. TAHLER) Mr. Wallace, do you recall our
25 discussing earlier David Bono?

1 recall?
2 A. Not that I recall.
3 Q. Mr. Wallace, in connection with that work you
4 were doing for Wayfarer, do you have any recollection of
5 ever speaking with Ms. Jones?
6 MR. COOLEY: Objection.
7 THE WITNESS: Related to Wayfarer?
8 Q. (BY MS. TAHLER) Yes.
9 A. I do not have any recollection.
10 Q. Do you have any recollection of ever being --
11 being copied on any communications with Ms. Jones in
12 connection with the work you were doing for Wayfarer?
13 A. Not that I recall.
14 Q. Did you ever understand that Ms. Jones was
15 involved at all in the work that you were doing for
16 Wayfarer?
17 MR. COOLEY: Objection.
18 THE WITNESS: Yeah. Could you rephrase
19 that question?
20 Q. (BY MS. TAHLER) I'm wondering whether or not
21 you had any understanding that Ms. Jones was involved in
22 all -- at all in any of the work you were doing for
23 Wayfarer.
24 A. I knew Ms. Jones represented Wayfarer at one
25 point.

Q. But with regard to your work, you never spoke to her, right?

A. I don't recall.

Q. Sitting here today, you don't have a recollection of speaking with her in connection with Wayfarer; is that right?

A. Not in collect -- connection with Wayfarer, no, I don't recall.

MS. ANASTASIO: 72.

(Exhibit No. 72 was marked.)

MR. BABCOCK: Are you done with 1?

MS. TAHLER: I am.

MR. BABCOCK: Let's put that one back in the stack so that we don't lose it.

THE WITNESS: You handed me this one.

Q. (BY MS. TAHLER) Mr. Wallace, you're now reviewing what's been marked as Exhibit 72. It's a document Bates stamped Jonesworks_MN_ several zeros 1249 through 1258.

Mr. Wallace, I'm not going to ask you about any of the details of the article that you're being forwarded.

A. Okay.

Q. Mr. Wallace, is Exhibit -- Exhibit 62 a forward that Melissa sent you on or about August 13th, 2024?

1 REPORTER'S CERTIFICATION
DEPOSITION OF JED WALLACE
2 TAKEN OCTOBER 10, 2025
3 I, Janalyn Elkins, Certified Shorthand
4 Reporter in and for the State of Texas, hereby certify
5 to the following:
6 That the witness, JED WALLACE, was duly sworn
7 by the officer and that the transcript of the oral
8 deposition is a true record of the testimony given by
9 the witness;
10 That the original deposition was delivered to
11 KRISTIN TAHLER;
12 That a copy of this certificate was served on
13 all parties and/or the witness shown herein on
14 _____.
15 I further certify that pursuant to FRCP No.
16 30(f)(i) that the signature of the deponent was not
17 requested by the deponent or a party before the
18 completion of the deposition.
19 I further certify that I am neither counsel
20 for, related to, nor employed by any of the parties in
21 the action in which this proceeding was taken, and
22 further that I am not financially or otherwise
23
24
25

interested in the outcome of the action.

Certified to by me this 11th day of October 2025.

JANALYN ELKINS
Texas CSR 3631
Expiration Date 1/31/2027
Veritext Legal Solutions
Firm Registration No. 571