SEPTEMBER 26, 2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,

Plaintiff,

-vs-

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,

Defendants.

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September 26, 2025
10:21 a.m.

CONFIDENTIAL

DEPOSITION of JENNY SLATE in the above-captioned matter, taken pursuant to Notice, held the offices of Willkie Farr & Gallagher, 787 Seventh Avenue, New York, New York before Fran Insley, a Notary Public of the States of New York and New Jersey.

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MINOO BLAESCHE, ESQ., Jackson Walker (via Zoom)
KEVIN FRITZ, ESQ. (via Zoom)
DAN ACOSTA, Videographer
ZACH CZERENDA, Concierge

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LP

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THE VIDEOGRAPHER: Good morning. We are now going on the record at 10:21 a.m., on September 26, 2025.

Please note that microphones are sensitive and may pick up whispering and private conversations. Please mute your phones at this time. Audio and video recording will continue to take place unless all parties agree to go off the record.

This is media unit one of the video-recorded deposition of Jenny Slate taken by counsel in the matter of Blake Lively versus Wayfarer Studios LLC, et al., filed in the United States District Court Southern District of New York, Case No. 1:24-CV-10049-LJL.

We are currently located at the Willkie Farr & Gallagher LLP offices, at 787 Seventh Avenue, New York, New York, 10019.

My name is Dan Acosta. I'm the videographer. The court reporter is Fran Insley. And we are from the firm Veritext

Legal Solutions. I'm not authorized to administer an oath, I'm not related to any party in this action, nor am I financially interested in the outcome.

If there are any objections to proceeding, please state them now. Otherwise, counsel and all present will be noted on the stenographic record.

With that, will the court reporter please swear in the witness and then counsel may proceed.

MS. HUDSON: I think we're going to put appearances on the record before we swear in the witness.

Esra Hudson of Manatt on behalf of plaintiff, Blake Lively. Here with me today is Stephanie Roeser, also of Manatt, Katelyn Climaco, also of Manatt, and on the Zoom is Lindsey Strasberg, also on behalf of the plaintiff.

MS. JACK: Autumn Adams-Jack, with Willkie.

MR. SCHUSTER: Good morning. Mitch Schuster from Meister Seelig & Fein, on

behalf of the Wayfair defendants, along with Jordan Biener and Marie Kessel.

MS. PORTER: Good morning. Katherine Porter from Akin Gump Strauss Hauer & Feld, and with me is my colleague, Sam Raggio, and we are here for the witness, Jenny Slate.

MS. HUDSON: Before you swear in the witness, I'd just like to note also participating by Zoom is Jamey Heath, and it sounds like we had some additional participants join?

THE VIDEOGRAPHER: Yes, ma'am. We have a Justin that logged on, we have a Lindsey Strasberg, and we have a Mitra Ahouraian as well.

MS. HUDSON: Thank you.

And Justin, for the record, is Justin Baldoni. Now we can proceed. Thank you.

J E N N Y S L A T E ,

having been first duly sworn by the Notary Public, was examined and testified as follows:

testified as follows:

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MS. HUDSON: Before we get started, I would like to take care of a few housekeeping matters for the record.

This case is venued in Federal Court in the Southern District of New York. In this deposition we will be operating under FRCP32D3A, which provides that all objections except to the form of a question are reserved for trial.

Any objections?

MR. SCHUSTER: No objection.

MS. HUDSON: This deposition is marked confidential under the protective order in this case. All attorneys and participants are covered by and/or have signed the protective order.

EXAMINATION BY
MS. HUDSON:

Q. Would you please state your name for the record?

A. My name is Jenny Slate.

Q. Have you ever been deposed before, Ms. Slate?

A. No.

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SLATE - CONFIDENTIAL

Q. Since this is your first deposition, I'm going to go over some of the ground rules we'll be using here today so we're all on the same page, okay? So I'll be asking you a series of questions, and all of my questions, all of your answers, and anything that is said by anyone here in the room today will be taken down verbatim by the court reporter sitting here to your right. Because the court reporter is taking down verbatim everything we say, it's important that we don't talk over each other. So it can be a little unnatural sometimes unlike normal conversation; you really have to wait for one person to stop talking before another one starts talking, and if we start to interrupt each other, I might ask you a question again. Okay?

A. Yes.

Q. And you're nodding your head a little bit when I'm talking to you, which I appreciate. If I ask you a question and you nod your head, I might ask you is that a yes or is that a no because the court reporter can only record audible sounds, okay?

SLATE - CONFIDENTIAL

only record audible sounds, okay?

A. Yes.

Q. You're under oath here today, which means your testimony is under penalty of perjury. Do you understand that?

A. Yes.

Q. And it has the same effect as if you were testifying in court even though we're in this informal conference room. Do you understand that?

A. Yes.

Q. If you don't understand a question that I ask you, please ask me for clarification, and if you don't ask for clarification, then I will assume you understood the question as asked. Does that sound fair?

A. Yes.

Q. During this deposition, your attorney may object to some of the questions. Counsel for the Wayfarer parties may object to some of the questions. As you can see, there's no judge in the room today, so no one will be ruling on those objections, and that means they're just for the record and you can answer

the question after the objection, unless your attorney instructs you not to answer. Okay?

A. Understood.

Q. After the deposition, the court reporter is going to prepare a transcript and you'll have the opportunity to review everything that you said and make any changes that you feel are necessary to make the testimony accurate. I do have to caution you, though, if you make a material change to the transcript, it could affect your credibility. And so for that reason, I just ask that you give your best testimony that you can here today, okay?

A. What is the material change in this context?

Q. Well, I think it's going to depend on the answer, but as an example, if you said the light was red and then when you read the transcript you change it to green, that would be a material change. Understood?

A. I understand.

Q. Do you have any questions about any of the procedures before we get started?

of the procedures before we get started?

A. No.
Q. Are you taking any medication that would affect your testimony today?
A. No.
Q. Is there any reason why you can't give your best testimony today?
A. No.
Q. So we all understand the terms that we're going to be using here today. During the deposition I'm going to be referring to Wayfarer Studios, LLC as "Wayfarer." Will up understand that to be Wayfarer Studios, LLC if I use the term "Wayfarer"?
A. Yes.
Q. And I'm also be referring to "The Film" from time to time, and when I refer to "The Film" generically like that, I'll be referring to It Ends With Us, okay?
A. Yes.
Q. And for the purposes of the trial in this case which is going to be venued here in New York, can you please tell my in what city and state you reside?
A. I reside in Brooklyn, New York.

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Q. Brooklyn, okay. Thank you. What is your current profession?
A. I am an actor.
Q. And how long have you been an actor?
A. Roughly 15 years.
Q. Have you worked primarily on films, TV or another medium?
A. All of the above.
Q. Approximately how many films have you acted in?
A. I'm not sure.
Q. Can you give an estimate?
A. Somewhere between 10 to 20.
Q. And do you primarily do films with small independent studios or large studios or is it a mix of the two?
A. It's a mix.
Q. Do you also work in TV?
A. Yes.
Q. Approximately how many TV shows have you acted in?
A. Again, I'm not sure.
Q. Can you give an estimate?
A. Fifteen.

SLATE - CONFIDENTIAL

Q. And you were an actress in the film It Ends With Us, right?

A. Yes.

Q. And in that film you portrayed the character of Allysa?

A. Yes.

Q. And who was Allysa in the film?

A. Allysa is the sister of Ryle and the best friend of Lily.

Q. And Ryle and Lily are the main characters?

A. Yes.

Q. How did you come to portray Allysa in the film?

A. I was offered the role.

Q. By whom?

A. Through an email from my agents.

Q. So you didn't audition for it?

A. No.

Q. When you were offered the role, what did you do to determine whether you wanted to take it?

A. I read the script. Like the first thing I did? I'm sorry.

view?

MS. PORTER: Objection to form.

A. Any issues with improvisation?

Q. I'm going to withdraw the question and we'll move on to another topic.

Did Wayfarer provide you with any workplace harassment training in connection with it ends with us?

A. Not that I can remember.

Q. Do you recall receiving any training regarding a safe work environment or sexual harassment?

A. Not that I can remember.

Q. Did you understand whether there was a human resources department in connection with It End With Us that you could go with any concerns related to the film?

A. I assumed.

Q. Did you know if there was one?

A. No.

Q. Were you ever given an email or a hotline you could use to raise concerns?

A. Not that I can recall.

Q. I am going to hand you a document

Q. What conversation had occurred?

A. Before this text exchange there was a conversation on set where I felt that something inappropriate happened and I mentioned it.

Q. Can you tell us a little bit more about what was going on? What was the inappropriate thing that you felt had happened?

A. We were, in my memory, getting ready to shoot, and Blake and I and Justin were on set, and he mentioned that she looked, I can't remember the order of it, but sexy and then hot, or hot and then sexy, or that her look was sexy or hot. And I remember her saying something like, "That's not what I'm going for." And then he tried another modifier, either hot or sexy, again I forget the order, and I remember her saying something like, "Not that either." And I then said to Justin something like, you know, I was recently talking to a friend about how comments about actors' bodies and their wardrobes, and again this is paraphrasing, but it ranged from irrelevant or unnecessary to like inappropriate

and distracting, and it's, you know, can be a little bit awkward to call it out but like we're just not doing this anymore. And I felt that I needed to say that because that's how I felt. I didn't want to speak for Blake because I didn't know her well at the time, and we -- you know, I can only speak for myself, so, generally. But Justin seemed that he didn't like that I said that because he sort of like walked away in a huff, and then came back and said something like, "The reason why I use the word hot is because it's hot in here." So that was the situation as I remember it.

Q. Did you believe him?

MR. SCHUSTER: Objection.

A. Did I believe him...

Q. That the reason he used the term hot was because it was hot in there?

A. No.

Q. What did you think of that comment?

MR. SCHUSTER: Objection.

A. I was disappointed by it.

Q. Did it sound to you like he was making an excuse that was not truthful?

SLATE - CONFIDENTIAL

MR. SCHUSTER: Objection.

A. Yes.

Q. And why is that?

A. Well, I was there, I heard the descriptor used in the context that it was used.

Q. Did you feel that you understood the meaning of what he was saying when he said it?

MS. PORTER: Objection to form.

Q. Let me ask that again. How did you understand Mr. Baldoni's comment to Ms. Lively?

A. I understood his comment to -- that it was about her appearance.

Q. Did you feel that it was about her character or her?

MR. SCHUSTER: Objection.

A. I felt that it was about her body.

Q. Did you come to understand how Ms. Lively interpreted Mr. Baldoni's comment at some point?

A. Yes.

Q. And when was that?

A. Later that day.

Q. So going back to this text chain, it

A. I was concerned and... yeah, I was concerned.

Q. Why were you concerned?

A. All of those things in my mind are unprofessional, inappropriate, and really out of the ordinary.

Q. What about these incidents that Ms. Lively described to you made you feel they were inappropriate?

A. Invasion of privacy, you know, calling someone's trainer to find out their body weight. Unprofessional emotional expression.

Q. Is there anything else you and Ms. Lively spoke about in that conversation?

A. I can't recall other specifics, but I know that the conversation was around listening to each other, wanting to be supportive, needing to be affirmed, validated, and trying to figure out what was going on.

Q. Did you find it unsettling, what was going on?

A. Yes.

Q. Did Ms. Lively tell you that

SLATE - CONFIDENTIAL

Q. What do you recall those to be at that time?

A. Justin's inappropriate comments. Generally a kind of chaotic set. Yeah.

Q. When you say his inappropriate comments, you mentioned the hot and sexy comments to Ms. Lively. Were there any comments to you that you felt were inappropriate at that time?

A. Yes.

Q. And is this from Mr. Baldoni?

A. Yes.

Q. What did he say to you that you felt was inappropriate?

A. He said something like, "I can say this because my wife is here, but you look sexy in what you're wearing."

Q. And what about that did you feel is inappropriate?

A. I would say it breaks a pretty well understood norm to comment, give your personal opinion on how someone's body looks.

Q. When you say a pretty well understood norm, can you explain a little bit

more what you mean by that?

A. Sort of like what I said previously in the situation that I described between Blake and Justin and I. I assumed there was an understanding of we're not doing this anymore. It's not appropriate anymore. It never was appropriate, but it's not appropriate in a workplace.

Q. And even on a film set?

A. In any workplace.

Q. And is that the case even though your physical appearance is an element of acting?

MR. SCHUSTER: Objection.

Q. Well, let me strike that. Is it the case that your physical appearance is an element of acting?

A. Yes.

Q. And is it the case that you felt it was inappropriate in this workplace even though your physical appearance is an element of acting?

A. Yes.

Q. And why is that?

A. The comment was about me, not my character. It wasn't useful for my work. It wasn't anything I wanted. It was unwanted and had no place, in my professional experience.

Q. Did you feel that same way about the comments Mr. Baldoni made to Ms. Lively that you described earlier?

A. Yes.

Q. Did you feel that Mr. Baldoni was sexualizing you?

MR. SCHUSTER: Objection.

A. Yes.

Q. Did you say anything to Mr. Baldoni at the time when he made the "sexy" comment to you?

A. Yes.

Q. What did you say?

A. I was surprised and bummed out, sort of lightly stunned, and I think I said something like, "Yeah, it's a good look."

Q. Did you tell him that you didn't like the comment?

A. I did not.

Q. And why did you not do that at that

time?

A. I didn't feel comfortable.

Q. Why not?

A. Because I think it was either my first or second day on set. He was my boss, and I just wanted to do my work and leave.

Q. Going back to the text chain in Ms. Lively's response to you, she says, in the second line, "I'm sorry for what you've experienced and I wish I would have been there to witness it for you." Was Ms. Lively not present when Mr. Baldoni made the "sexy" comment to you?

A. I don't remember her being there.

Q. Did you talk about that comment in your conversation with her in the trailer on May 23rd?

A. I must have.

Q. And then at the end of this entry in the text exchange Ms. Lively says, "You were able to be bold without being inflammatory which is such a tightrope and I really appreciate it." Did you understand this to be referencing the statement that you made to

weirded out by that.

Q. How did you find out?

A. Because as I was -- I found out because when I was leaving the room he made a joke along the lines of "I may or may not have recorded that whole thing."

Q. Did you say anything at the time?

A. I can't remember what I said.

Q. Did you and Ms. Lively talk about that?

A. Then?

Q. At any time. Let's first talk about it then. Did you talk about it then?

A. Blake immediately said something along the lines of that that wasn't legal to do that.

Q. How did Mr. Baldoni respond?

A. I can't really recall what he did.

Q. Did he react well?

A. I can't remember. I was very flustered.

Q. And going back to the time where Mr. Baldoni referred to Ms. Lively as sexy and hot and you made your statements, you said that

SLATE - CONFIDENTIAL

he walked away. Did he seem upset?

MR. SCHUSTER: Objection.

A. Yes, he seemed -- he seemed upset.

Q. And what about his manner led you to believe that he was upset?

A. Kind of a -- like walking off in a huff type of mannerisms.

Q. Going back to Exhibit 5, at the end here you say, "How you feeling? I'm so dead today, my apologies." And then Ms. Lively says, "You are not dead to my eyes. I'm having a funky time today. You?"

A. Uh-uh.

Q. Do you see that?

A. Yes.

Q. Was that the next shoot day? The timing is a little off on this potentially because we can't tell if it's -- well, it's GMT time, so, but it looks like it's the next day. Do you recall?

A. I can see what you can see here.

Q. Okay, but do you have any recollection of it being the next day when you began this next text exchange?

about what was happening?

A. No.

Q. Did you arrive at your feelings independently, based on your own experiences?

A. Yeah.

MS. HUDSON: Alright. Should we take a little break?

MS. PORTER: Yes.

THE VIDEOGRAPHER: We are going off the record. The time is 11:46 a.m. This ends media unit one.

(Off the record.)

THE VIDEOGRAPHER: We are now going on the record. The time is 11:59 a.m. This is the beginning of media unit two.

Q. Ms. Slate, I'm going to hand you another document that we're going to be marking as Exhibit 7.

(Whereupon Exhibit 7 was marked for identification.)

MS. HUDSON: Exhibit 7 is a text chain between Ms. Slate and Ms. Lively, dated May 25th, 2023, Bates stamped JS374 through 376.

SLATE - CONFIDENTIAL

Q. Ms. Slate, do you recognize this as a text exchange between you and Ms. Lively that you participated in?

A. Yes.

Q. And it looks like this continues the prior conversation where Ms. Lively said she was feeling funky. Do you agree?

MR. SCHUSTER: Objection.

A. Yes.

Q. And you respond, "So funky?"

MS. PORTER: Objection.

Can you point us to which prior conversation you're referencing?

MS. HUDSON: Sure. Exhibit 5, JS370.

Q. Do you see the last exchange from Ms. Lively, she says, "I'm having a funky time today. You?" And then it looks like you respond, "So funky" in Exhibit 7.

A. Yeah. Oh, I see. I'm sorry. I was confused by the time. Yes.

Q. And do you recall this exchange, as you look at it?

A. As I look at it, yes.

SLATE - CONFIDENTIAL

Q. Do you remember what you meant by funky?

A. Being unsettled, feeling weird.

Q. Did it feel like there were issues that were unresolved?

MR. SCHUSTER: Objection.

MS. PORTER: Objection to form.

MS. HUDSON: I'll withdraw that and restate it.

Q. Did you feel like there was something that could be done to help you feel settled and less weird, as you describe it?

MR. SCHUSTER: Objection.

A. I wasn't sure.

Q. Ms. Lively says then that she feels like she needs to say something tonight after wrap. Do you see that?

A. Uh-huh. Yes, I do.

Q. And then you respond that "If you want someone to be there to advocate for/with you, I'm there." Were you glad that Ms. Lively was willing to speak up?

A. Yeah.

Q. And then if you go down below at

SLATE - CONFIDENTIAL

Q. Did you see this as a general invitation to go into her trailer anytime she was pumping breast milk?

MR. SCHUSTER: Objection.

A. No.

(Whereupon Exhibit 8 was marked for identification.)

Q. I'm going to hand you what we marked as Exhibit 8. In addition to sharing your concerns with your manager, did you also share your concerns with your agent?

A. Eventually, yes.

Q. And is your agent Josh Pearl?

A. At the time, yes.

MS. HUDSON: The document that we just marked as Exhibit 8 is a text exchange, dated May 27, 2023, between you and Josh Pearl, Bates stamped JS506 through 507.

Q. Do you recognize this as a text exchange between you and Mr. Pearl that you participated in?

A. Yes.

Q. And Mr. Pearl was your agent at the

time?

A. At the time he was my agent.

Q. And in the first text in this chain you asked him if Stacy has gotten in touch with him, right?

A. Yes.

Q. And then you go on to tell him that "This week was really intense for a few reasons. It's like fascinating and also so shitty. Justin and Jamey are truly unfit. I'm not scared or anything, just repulsed and deeply irritated, and I know Blake is experiencing that on a much more serious level." Is there anything that was occurring on set other than the incidents that you have described?

MS. PORTER: Objection to form.

A. Other than what I've described? I'm not exactly sure, like, how to answer that, honestly. I think -- I think what I described are the issues other than, you know, Covid and the strike, the general chaos that I sort of described, and the behavior that was as described here. I think that's that.

Q. And this reflects the feelings you were having at the time accurately?

A. Yes.

Q. And Mr. Pearl responds, "Are you okay to continue?" Do you see that?

A. Yes.

Q. Were you considering not continuing with the film at that time?

A. No.

Q. And then you go on to say that you're okay to keep going. But you say, "I feel like it's about to get really bad and I'm not sure what Blake's limit is but she's really taken a lot of crap from them, like crazy shit, and I'm not kidding when I tell you that Justin and Jamey me freak me out. Like they tell really weird lies and Justin is astoundingly wrongheaded." When you say they tell really weird lies, what did you have in mind at the moment?

A. I don't recall.

Q. And then you say, "I really don't get how he did a TED Talk. He is worse than most of the bros I've encountered, not because

he's predatory but because of his general fragility and misogyny, like not seeming to be aware of any of the obvious no-no's." What were you referring to there in terms of his fragility and misogyny and not being aware of any of the obvious no-no's?

A. The defensiveness of that sort of huffy behavior. The inappropriate behavior. Those types of things.

Q. Were you referring to the TED Talk that your other agent had told you about before you took the role?

A. Yes.

Q. And you understood that to be a TED Talk in which he described himself as a male feminist?

A. Something like that, yeah.

Q. And did you feel that his behavior was not consistent with someone who proclaims to be a male feminist?

MR. SCHUSTER: Objection.

MS. HUDSON: Well, strike that.

Q. Why did you reference his TED Talk here?

A. I referenced it because of what I say here, his behavior was really at odds with someone who is apparently an expert enough to do a TED Talk.

Q. And then Mr. Pearl asks you if you had spoken with Alex. Did you understand that to be Alex Saks?

A. Are you -- when he says, "How's Alex been?"

Q. Yes.

A. I'm sorry. I'm reading through this 'cause I haven't --

Q. No problem. We're going through this kind of quickly. I'm going to ask you another question, so ignore that one. You say you haven't spoken to Alex because "when we had brunch she said she had been friends with Justin for a while and I just felt weird." Is that accurate?

A. Yes.

Q. As to why you didn't speak with Alex?

A. Yes.

Q. And what was your understanding of

Alex Saks and Mr. Baldoni's relationship?

A. I didn't know a lot about it, but she said she had known Justin for a few years.

Q. And you said at that point, "He had made the comment to me about looking sexy, but I had decided to just to try to push past it even though it made me feel so unsettled and deeply, deeply disappointed and irritated." Does that accurately describe how you felt?

A. Yes.

Q. And then you tell Mr. Pearl that Ms. Lively had alerted Ms. Giannetti at Sony and that Ms. O'Neil was also planning to talk to Ms. Giannetti, correct?

A. Yes.

Q. And then your last line here in this text chain is, "I do kind of feel like there might be a limit to what people can take. There are also a lot of crew people who are pretty upset." Who on the crew did you understand to be upset at that time?

A. People in the hair and makeup department and a couple of PAs.

Q. And who in hair and makeup?

Q. With respect to Mr. Heath going into Ms. Lively's trailer, did you hear about that from anyone other than Ms. Lively?

A. I don't think so.

Q. What do you recall her telling you about that at whatever point it was?

A. I don't recall anything specific, but just that she felt like they were just coming in. Yeah.

Q. You say you don't recall when Ms. Lively told you this. Was it during the first phase of filming?

A. I think so.

Q. And there was a break in the filming because of the WGA strike, correct?

A. Yes.

Q. And that happened sometime in late June?

A. I believe so. Sometime in June.

Q. Of 2023?

A. Yes.

Q. And with respect to Ms. Lively telling you that Mr. Baldoni was improvising physical intimacy, did she tell you about that

during the first phase of filming?

A. I think so, yes.

Q. And what do you recall her telling you?

A. I recall her saying that he was biting her lip when they were kissing.

Q. Did she tell you that he improvised physical contact that was not written in the script?

A. Yeah, that's what she felt.

Q. Did you feel something like that would be appropriate?

MR. SCHUSTER: Objection.

A. Something like what?

Q. Did you have any views on whether it was appropriate for Mr. Baldoni to improvise kissing or other physical intimacy that wasn't written in the script?

MR. SCHUSTER: Objection.

A. I think it's appropriate to do what you planned to do in the scene.

Q. So in your view if it wasn't planned it would not be appropriate?

MR. SCHUSTER: Objection.

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Q. Did Ms. O'Neil report back to you about the conversation that she had with Ms. Giannetti?

A. Yes.

Q. Do you remember that conversation with Ms. O'Neil outside of what's written in this text?

A. Not specifically.

Q. In the text you say that "Ms. O'Neil went through the general points of the unprofessional behavior and the feeling that I have that's affecting the work." Do you see that?

A. Yes.

Q. Did you feel that it was affecting your work?

A. Yes.

Q. Did you feel that the work environment in general was altered by the behavior of Mr. Baldoni and Mr. Heath?

MR. SCHUSTER: Objection.

A. Yeah, yes.

Q. And then you also wrote that you "ended up telling your manager the whole deal,

like just all of the weird stuff that Justin and Jamey have pulled." Do you recall specifically what you told your manager with respect to that?

A. Not specifically at this point, no.

Q. And then you also wrote to Ms. Lively that you planned to speak with Alex the next day and tell her about your discomfort and feelings of being unsettled. Do you see that?

A. I do.

Q. So at that point had you decided to speak with Ms. Saks notwithstanding the fact that she had a longer relationship with Mr. Baldoni?

A. It appears so.

Q. And what prompted you to want to raise your concerns with Ms. Saks?

A. I don't recall.

Q. And then in Ms. Lively's response she says, "Because I haven't spoken to Justin or Jamey or Alex about the inappropriate behavior yet, you can just speak to what you've witnessed and experienced. I told Ange but I

asked her not to mention so that I could personally tackle since I have to try to salvage some degree of chemistry and camaraderie with Justin who's not only my director but love interest and we're not even one-third of the way done." What did you understand Ms. Lively to be communicating to you here?

MR. SCHUSTER: Objection.

A. The way I took that was that she felt that her work would suffer if she brought it up then, and that I should just talk about what had happened for me.

Q. To Ms. Giannetti?

A. Yes.

Q. And then if you go down, there's an entry from Ms. Lively at 2:44 a.m., where she says, "You were standing there for the thing he said to me when he said I look hot. I said that's not what I'm going for, and he said, okay, sexy, and then made a joke once he asked if he crossed a line, and I said yes, that he must have missed the sexual harassment meeting." Now, you described this incident in

your own words earlier. Do you recall Mr. Baldoni saying at the end of that that he must have missed the sexual harassment meeting?

A. I don't specifically recall that.

Q. Do you have any reason to doubt Ms. Lively's recollection of that?

MR. SCHUSTER: Objection.

A. No.

Q. When you saw this you didn't think immediately, well, that's not right, he didn't say that?

MR. SCHUSTER: Objection.

Q. And correct her, correct?

A. In these texts?

Q. Yes.

A. Yeah, I don't correct her.

Q. If Ms. Lively had recounted something that you believe was inaccurate, would you have said to her you remembered it differently?

MR. SCHUSTER: Objection.

A. I don't feel like I can speak to that hypothetical.

Q. That's fair. If you go to the next

page, at 3:18 a.m. there's a text from Ms. Lively where she says, "It's a culmination. The difference is if someone said something to one of us, if we made them uncomfortable, neither of us would behave the way he does after. That's what's odd. He keeps referencing it or disconnects entirely or gets snippy and impatient as a director." Is that the experience that you had as well?

MR. SCHUSTER: Objection.

A. Yes.

Q. Did you understand this to be in reference to Mr. Baldoni?

A. Yes.

Q. And then Ms. Lively says, "He was so huffy after the sexy thing I felt awful for saying something." Was that consistent with your experience?

A. Yes.

Q. And then if you skip down to 3:28 a.m., Ms. Lively says, "What you said though is very self-aware. Neither of us are people who can't take a joke or who can't work or understand blue. We're not that fragile.

You just can't record people without asking. You can't speak to people sexually while not in character or while talking about the character, and if you overstep, you move on. It's the weirdness after that makes it feel bad. Like if we speak up, the vibes on set get funky and the work suffers." Did you feel that Ms. Lively in this exchange accurately reflected what was happening on set with Mr. Baldoni?

MR. SCHUSTER: Objection.

A. In that situation that I experienced, where he talked about her looking sexy or hot, yes.

Q. And then the recording here, did you understand that to refer to the recording of the Zoom?

A. Yes.

Q. And did you agree that in your view you and Ms. Lively were not fragile and could take a joke?

MR. SCHUSTER: Objection.

A. Yeah.

Q. If you go to the end of this text

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A. No.

Q. I'm going to hand you a document marked as Exhibit 12.

(Whereupon Exhibit 12 was marked for identification.)

MS. HUDSON: Exhibit 12 is a text exchange, dated June 1st, 2023, Bates stamped JS333 through 35.

Q. Do you recognize this as a text exchange between you and Alex Saks that you participated in?

A. Yes.

Q. And can you tell that it's Ms. Saks just from the context?

A. Yes.

Q. And in this message Ms. Saks sends you a note from Mr. Baldoni. Do you see that?

A. Yes.

Q. And how would you characterize this note? You said earlier that he did not give you an apology. Do you not see this as an apology note?

A. No, I don't see it as an apology.

Q. How would you characterize this

note?

A. I would characterize this note as an acknowledgment that he received information from Ange and that, as he said, adjustments will be made accordingly.

Q. How did you feel having received this note?

A. I felt that it was, you know, not taking direct accountability and like lame, but it was also enough for me to feel like I could focus up and do our work and... yeah.

MS. HUDSON: With that, I think it's 1 o'clock. Should we break for lunch?

MS. PORTER: How are you feeling?

THE WITNESS: Yeah, sure.

MS. HUDSON: We'll take 30 minutes.

THE VIDEOGRAPHER: Going off the record. The time is 1:01 p.m. This ends media unit two.

(Time noted: 1:01 p.m.)

(Lunch recess.)

AFTERNOON SESSION

THE VIDEOGRAPHER: We are now going back on the record. The time is 1:38 p.m.

group of people on June 4th, 2024?

A. Yes.

Q. And it looks like the subject matter of this text exchange is something called the EPK. Can you tell me what an EPK is?

A. It's -- EPK, let's hope I'm right, stands for, I want to say, electronic press kit but I might be wrong. And usually what that is is sometimes they do it on set, sometimes they do it after production has wrapped, in the post-production time. They ask you questions about the production, your role, stuff like that and then they can use it for promotional materials.

Q. And it looks like what --

MS. PORTER: I was just going to mention, I think in your question you asked 2024, but it's 2023, just to -- for the record.

MS. HUDSON: Thank you, yes. For the record the -- counsel is correct. The date of the text is June 4th, 2023. Thank you for correcting that.

Q. It looks like you have been -- you

were sent some questions to answer for the EPK as part of this text chain; is that right?

A. Yes.

Q. And you say here to your team here, "Hey, guys - I don't want to do anything with Justin. I don't want to talk about him, like... nothing. And the same goes for Jamey, who is truly unprofessional. I also haven't read the book, so definitely no q's about that. I'm just not sure how visible I want to be in this campaign, and looking over this list, I'm wondering if actually we should wait a beat. What is Blake going to do? I'll ask her myself on Tuesday."

So was it your feeling at this time that you did not want to do anything with respect to press or promotion of this film?

A. It seems that that was my position at the time.

Q. And it says here that, "I'm going to ask" -- "I'll ask her myself on Tuesday." Had you not discussed this issue with Ms. Lively by this time?

A. I can't specifically recall but I

guess not.

Q. Did Ms. Lively tell you to tell your team that you didn't want to do press or publicity?

A. No.

Q. This was something that you did independently?

A. Yes.

Q. I'll hand you what we will be marking as Exhibit 17. Exhibit 17 is an email exchange dated June 4th, 2023, between Samantha Cooper, Jenny Slate, Paris Reise, Alexander Crotin, Karen Gardener, Stacy O'Neil and Jenny Slate, CAA team regarding Jenny Slate upcoming publicity schedule as of June 4th, 2023. Bates stamped JS520 through 522. Do you recognize this as an email exchange that you had with the people that I just described on June 4th, 2023?

(Whereupon Exhibit 17 was marked for identification.)

A. Yes.

Q. And in the beginning email below from Paris Reise, there is a schedule of various publicity events. Do you see that?

A. Yes.

Q. And in response to this schedule, you say, "Hi there - my concerns are only increasing about our director and producer Jamey. I'd like to do the bare minimum here, let's talk on the phone and cut it way down, please!" Again, is this how you were feeling at this time about doing anything related to publicity for the film?

A. Yes.

Q. And at some point did you -- were you involved at all in publicity or press for the film?

A. Yes.

Q. And I'm going to hand you a document that we will mark as Exhibit 18. Exhibit 18 is a text exchange between Ms. Slate and Josh Pearl dated July 26, 2024 Bates stamped JS512 to 514. Do you recognize this as a text exchange that you participated in with Mr. Pearl?

(Whereupon Exhibit 18 was marked for identification.)

A. Yes.

A. I think what the text is what it says.

Q. And it's an accurate description of how you were feeling about them at the time?

A. At this time, July 26th, yes.

Q. Now, you said that you did participate in some press and publicity for the film. Is the fact that Ms. Lively's cut with Sony was the one that was being released -- strike that.

Did the fact that Ms. Lively's cut with Sony, was the one that was being released, impact your willingness to do press or publicity for the film?

A. I don't think that it mattered to me whose cut it was. I think it just mattered to me that the cut was watchable.

Q. At some point, did you see the cut of the film?

A. I never saw the full, like, completed movie.

Q. What made you decide to participate in press or publicity for the film at all?

A. I didn't want to let my cast mates

down. I didn't want to be dramatic. It seemed that everybody was participating and I just wanted to make it easy, yeah.

Q. Did you do any publicity or promotion with Mr. Baldoni?

A. No.

Q. Did you tell anyone that you would not do press or publicity with Mr. Baldoni specifically?

A. I believe so.

Q. Beyond what you had told your team in 2023? Let me just clarify.

Did you consistently take the position that you would not do press or publicity with Mr. Baldoni from 2023 up through the time that you were doing publicity and promotion?

A. Yes.

Q. And what did you do in terms of publicity and promotion for the film?

A. What I recall is two content days and a press junket, and that also included, like, a -- like, a taped appearance for a morning TV show and I went to the premier and,

you know, the photo call there.

Q. And were you -- did you receive direction about how to talk about the film, talking points, things along those lines from anyone?

A. I believe there was -- you know, there were talking points from either Sony or, you know, usually there is -- there are those. I'm not usually someone that reviews those and I don't remember reviewing them.

Q. Is -- did you have your own views of how you were going to speak about the film?

A. Nothing planned.

Q. Do you recall how you spoke about the film during that -- those promotional activities?

A. I recall wanting to avoid drama in the, sort of, like, social media sphere and wanting to support Blake's performance and -- and speaking to that.

Q. Okay. And did you speak about the movie as a film of female empowerment?

A. It's quite likely. I don't recall exactly.

Q. Is that how you saw the film?

A. I saw the film as a film about domestic violence and the capacity for a person to try to extricate themselves from the traumatic cycles and a love story, sorry.

Q. At some point, did you learn that there was negative internet chatter about the film after it was -- at or around the time it was released?

A. Yes, at some point.

Q. And how did you first learn that?

A. I can't recall how I first learned it.

Q. Are you somebody who is frequently on social media?

A. No.

Q. Do you manage your own social media?

A. I do not.

Q. Does your publicity team manage your social media?

A. No.

Q. Who manages your social media?

A. I have an assistant and when I need to post something, she does it for me.

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of how you were feeling at the time and what you believed?

A. Yes.

Q. I'm going to hand you a document we are marking as Exhibit 21. At some point, did you learn that Ms. Lively had filed a complaint against Mr. Baldoni, Mr. Heath, Wayfarer and others?

(Whereupon Exhibit 21 was marked for identification.)

A. Yes.

Q. And did you also understand that there was New York Times story reporting on the complaint?

A. Yes.

Q. And did you read The New York Times story?

A. Yes.

Q. And did you read the complaint that was filed at or around that same time?

A. I did not.

Q. Okay. Did Ms. Lively, at some point, ask you if you would say something in support of her?

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support of her?

A. As I recall, yes.

Q. I'm going to direct your attention to Exhibit 21, which is a text exchange dated December 23, 2024 between you and Ms. Lively, Bates stamped JS504 through 505. And at the top of this text chain is a text from Ms. Lively where she says, "Your experience in this is every bit as valid as mine. We were all unwilling participants in the circus that they created. Before, during and after the film. I want you to take care of you and your family and always do what's right for you and them. If you ever want to join in any way you're comfortable, the door is always open. But that never means you need to come in. I love you above all else."

Did you feel -- well, how did you view that?

A. I took her at her word.

Q. And then it looks like you decided to write a statement; is that right?

A. Yes.

Q. And what made you decide to do that?

A. I talked to my husband. I talked to

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people that I trust. I thought about what is important to -- to me and that's how I ended up writing.

Q. In this statement, did you post it on your Instagram?

A. No.

Q. What did -- what did you do with the statement?

A. I gave it to Alex, my publicist and told her to place it.

Q. And the statement that is included in here at 7:19 p.m., is that the statement that was released publically?

A. Yes.

Q. And at the end of that exchange you say, "I love you so much, what has happened is so much more terrifying and gross than what I could have ever imagined, even with that disgusting experience on that, I just never imagined that anything like this was even possible. Thank you so much for protecting me, and for all of your love and support."

When you wrote that, were you communicating your genuine feelings?

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25 communicating your genuine feelings?

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A. Yes.

MS. HUDSON: I have no further questions at the time -- at this time and I reserve the remainder of my time for rebuttal.

MR. SCHUSTER: How much is the remainder?

MS. HUDSON: I have about eight minutes.

THE VIDEOGRAPHER: Counsel, do you want to go off the record for a moment?

MS. HUDSON: Sure.

THE VIDEOGRAPHER: We are now going off the record. The time is 2:33 p.m. This ends Media Unit 3.

(Off the record.)

THE VIDEOGRAPHER: We are now going back on the record. The time is 2:47 p.m. And this is the beginning of Media Unit 4.

EXAMINATION

BY MR. SCHUSTER:

Q. Good afternoon, Ms. Slate.

A. Hi.

Q. My name is Mitch Schuster. I'm with

the law firm of Meister Seelig & Fein. I represent the defendants in this action. By the defendants, I'm referring to Wayfarer Studios, LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie, LLC, Melissa Nathan, the Agency Group, PRLLC, Jennifer Abel, Jud Wallace and Street Relations, Inc.

During the course of the deposition, I might refer to those parties as the defendants. Is that okay with you?

A. Yes.

Q. And I'm going to ask you if you could be guided by the instructions that Ms. Hudson did such a great job of giving you this morning, and I think things will flow smoothly and efficiently. However, if at any time I ask a question that you don't understand, I'm going to ask that you let me know so that I have the opportunity to rephrase it so that you do understand it, okay?

A. Okay.

Q. And you do understand you are still under oath?

A. Yes.
Q. I will do my best not to repeat questions that you were asked earlier, but inevitably, I fear it's going to happen, so I'm going to apologize in advance, okay?
A. Thank you.
Q. Have you ever been known by any other names other than Jenny Slate?
A. No.
Q. You looked like you were still thinking.
A. Oh, sorry. Like, nicknames?
Q. Any professional name, maiden name, married name.
A. No, just Jenny Slate.
Q. Okay. Have you ever been convicted of a crime?
A. No.
Q. Have you consumed any alcoholic beverages within the last 24 hours?
A. Yes.
Q. Can you tell us what you consumed?
A. Yes. I had a cocktail yesterday night.

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Q. Okay. Have you taken any drugs within the last 24 hours?

A. No.

Q. Have you taken any medication that has been prescribed for you within the last 24 hours?

A. Yes.

Q. Okay. Is that -- will that medication in any way impact your ability to testify truthfully today?

A. No.

Q. Have you failed to take any medication that has been prescribed for you?

A. No.

MS. PORTER: Objection to form.

Q. Have you read the complaints in this matter?

A. Not completely.

Q. Have you been following the case?

A. Through my representatives.

Q. When you say "representatives," who are you referring to?

A. Publicists, lawyers, agents, and managers.

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managers.

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Q. And do you inquire of your representatives as to the status of the case, do they bring the status of the case to your attention or something else?

MS. PORTER: I'm going to instruct the witness not to answer any -- provide any answer that reveals the substance of our communications with her attorneys.

Q. Yes. And I'm not asking about the substance of communications. I'm just asking whether they reach out to you or you reach out to them?

A. My publicist reaches out to me if there is something I need to know.

Q. What types of things has your publicist reached out to talk with you about where she felt that you needed to know as it relates to this case?

A. Articles that need to be fact checked.

Q. Anything else?

A. No.

Q. Okay. Are you represented by counsel today?

publicist or anyone who's identified in a text message, have you used it with any -- have you described them in a derogatory way to anyone else who was not contained with the text messages that we've looked at today?

MS. HUDSON: Objection.

MS. PORTER: Objection to form.

A. I am sure. I was very angry.

Q. What were you so angry about? Is it anything other than what we have already discussed? I don't want to force you to repeat it, but is there anything other than what we have already discussed that caused you to be so angry at Mr. Baldoni, Mr. Heath and/or any of the other defendants?

MS. PORTER: Objection to form.

MS. HUDSON: Objection.

A. I guess could you rephrase that?

Q. Okay. I think you said you were so angry, and I'm trying to find out, is there anything other than the events, which you've already talked to us about, that caused you to be so angry? We went through a list of about nine incidents. Is there anything else that

caused you to be so angry that resulted in you referring to them in a derogatory way?

MS. PORTER: Objection to form.

MS. HUDSON: Objection.

A. It's hard to say right now. It was a long time ago and it was a real cluster of stress, stressful situations.

Q. Anything about that stressful situation, that so stressful situation that has stayed with you that you could recall today as you sit here?

MS. PORTER: Objection to form.

MS. HUDSON: Objection.

A. For me, only in the form of lessons, lessons learned on how I make my decisions.

Q. Okay. When you accepted this role, though, you had some reservations. Is that fair to say?

A. I had light reservations.

Q. Okay. Had you spoken to anyone about Justin Baldoni before accepting the role?

A. No.

Q. Had you read anything online about Justin Baldoni before accepting the role?

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A. I knew that he had been on Jane the Virgin. Is that what it is called? Yeah.

Q. I think so.

A. Yeah, yeah.

Q. Other than that initial Zoom where you got that general vibe about him, did you do any other research about him?

A. No.

Q. Did you ever do any research about Blake Lively?

A. No.

Q. Had you ever heard anything about Blake Lively before working with her on this project?

MS. HUDSON: Objection.

MS. PORTER: Objection to form.

A. Heard anything?

Q. Let me rephrase the question.

Had you ever heard anything negative about Blake Lively before beginning this project with her?

A. No.

Q. Had you ever read anything online that was negative about Blake Lively?

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that was negative about Blake Lively?

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A. No.
Q. And the only bad vibe you had going into this project was a bad vibe you had about Justin Baldoni; is that correct?
A. Yeah, yes.
Q. Do you know who Leighton Meester is?
A. I don't know her but I know who she is.
Q. Who is she?
A. An actress.
Q. Do you have any opinions about her?
MS. HUDSON: Objection.
A. No.
Q. Do you know that Blake Lively worked with her on a show?
A. Yes.
Q. Have you heard that Blake Lively and Leighton Meester avoid each other like the plaque?
MS. HUDSON: Objection.
A. No.
Q. Do you know if that's true or you've never heard that?
MS. HUDSON: Objection.

A. Yeah, I have never heard that.
Q. Do you know why it might have been said?
MS. HUDSON: Objection.
A. I can't speculate.
Q. Does of the allegation that Leighton Meester and Blake Lively avoid each other like the plaque impact your opinion of Blake Lively?
MS. HUDSON: Objection.
A. No.
Q. Do you know who Anna Kendrick is?
A. Again, I don't know her personally, but of course, I know who she is.
Q. Do you have an opinion about her?
A. No.
MS. HUDSON: Objection.
Q. Are you aware of rumors that Blake Lively and Anna Kendrick do not get along?
MS. HUDSON: Objection.
A. No.
Q. Does the allegation that Anna Kendrick and Blake Lively do not get along impact your opinion of Blake Lively?
MS. HUDSON: Objection.

MS. HUDSON: Objection.

A. No.
Q. I mean, as you sit here today, you have a good opinion of Blake Lively, correct?
A. I don't have a current opinion of someone I haven't spoken to in months.
Q. Do you anticipate speaking with Blake Lively when this case is concluded?
A. I don't know.
Q. Do you have a hope that your friendship will resume with Blake Lively when this case is concluded?
A. I can't say.
Q. Is there a reason why you would not want to resume your friendship with Blake Lively at the conclusion of this case?
A. No.
Q. Are you aware that Blake Lively and Ryan Reynolds allegedly began their relationship while he was still married to Scarlett Johansson?
MS. HUDSON: Objection and move to strike, counsel.
MR. SCHUSTER: You can object, but that's it. There are no speaking

e
y?

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objections. And you can't --

MS. HUDSON: Actually, you are -- you cannot go into my client's sexual history.

MR. SCHUSTER: Okay. Make your objection and then let's have a conversation, but don't make speaking objections.

MS. HUDSON: That's fine. Let's have a conversation. I object to this line of testimony because it violates the law.

Q. Okay. Are you aware that Blake Lively married Ryan Reynolds on a slave plantation in South Carolina?

MS. HUDSON: Objection.

A. I did know that they were married on a plantation.

Q. Have you ever read any of the comments about the fact that Blake Lively married Ryan Reynolds on a slave plantation?

MS. HUDSON: Objection.

A. No.

Q. Does the fact that Blake Lively

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Q. Does the fact that Blake Lively

married Ryan Reynolds on a slave plantation in South Carolina change your opinion about her in any way?

MS. HUDSON: Objection.

MS. PORTER: Objection to form.

A. That's not something I thought about.

Q. As you sit here today, does that impact your opinion of Blake Lively?

MS. HUDSON: Objection.

A. No.

Q. Are you aware of Blake Lively's lifestyle brand called Preserve?

MS. HUDSON: Objection.

A. I think I remember that she had that, but I don't know anything about it.

Q. Are you aware that there were allegations of a toxic, unprofessional and disorganized workplace culture?

MS. HUDSON: Objection.

A. No.

Q. Are you aware that former staffers at her company accused the company of chaos and mismanagement?

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Q. Did Blake Lively ever tell you that any of the defendants questioned her about her sexual fantasies or sexual performance?

MS. HUDSON: Objection.

A. I --

MS. HUDSON: Counsel, before we go into this, I would like to just invoke FRCP, I'm sorry --

MR. SCHUSTER: I'll withdraw the question.

MS. HUDSON: FRA412.

MR. SCHUSTER: I'll withdraw the question.

MS. HUDSON: Okay.

Q. Going back to the occasion when Justin referred to Blake as sexy or hot or hot and then sexy, was that during filming or as something was about to be filmed?

A. In my memory, it was, like, start of the day and, like, setting up a shot, like, getting ready to rehearse, something like that.

Q. And where physically did that scene take place? Was that in an office, was that on a studio? And I apologize if I'm using the

wrong terminology.

A. It was in a bar.

Q. Okay. Do you recall that bar being particularly hot at that time?

MS. HUDSON: Objection.

A. I don't know, maybe.

Q. Okay. Do you recall what Blake was wearing?

A. I remember that she was in her, like, own clothes, not wardrobe.

Q. Do you remember if she was wearing a jacket?

A. Yes, in my memory, it was, like, a -- like, some sort of button up or something, and from what I remember, but maybe I'm wrong, that she had, like, a blazer that I think she said was Ryan's blazer.

Q. As best you can recall, what was the interaction between Blake and Justin as it relates to that comment?

A. What I've already described.

Q. That fully describes your memory of that event?

MS. PORTER: Objection to form.

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MS. HUDSON: Objection.

A. I think so.

Q. What did -- what happened after Justin made that comment?

MS. HUDSON: Objection.

A. In my memory, that was when I said that -- you know, as I described before, that the comments were kind of like ranged from being, like, irrelevant, doesn't matter when people think about what we look like in our clothes, to, you know, kind of disruptive, like, distracting and not doing that anymore. I can't remember the -- if Justin left, like, between when he said the sexy hot stuff and then came back and then I said that or I can't remember how many times he left. Maybe it was once, maybe twice, but then after I said that, I, in my memory, he left, kind of, as I described before -- kind of, like, huffed away and then came back and said the thing about the reason why he said the word hot was because it was hot in the bar.

Q. Did he ever apologize for that comment?

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A. No, not that I can remember.

Q. Who else was present at that time?

A. Blake, there were lots of crew members, people around.

Q. Okay. Do you know if the interaction was audio recorded?

A. No.

Q. Do you know if there is a video recording of that interaction?

A. No.

Q. During the course of this production, did you ever hear Blake Lively use the term sexy?

A. Nothing comes to mind.

Q. Did you ever discuss sex or your sex life?

MS. PORTER: Objection to form.

MS. HUDSON: Objection.

A. With Blake?

Q. With any -- with anybody in connection with this movie.

MS. HUDSON: Objection.

A. Nothing more than what the text message shows about a joke that I made about

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A. This is not my lawsuit.

Q. Okay. Is there a reason why you did not join Blake Lively in this lawsuit?

MS. HUDSON: Objection.

MS. PORTER: Objection to form.

A. I felt that I settled my issues on set and I wanted to move on.

Q. Thank you. Do you know if Blake Lively told Sony that you would not attend the premier if Justin attended?

MS. HUDSON: Objection.

A. I don't know that.

Q. Did you ever tell anyone that you would not attend the premier if Justin Baldoni attended?

MS. HUDSON: Objection.

A. No.

Q. Do you know if Blake Lively ever told Sony that Colleen Hoover would not attend the premier if he attended?

MS. HUDSON: Objection.

A. I don't know anything about what Blake said to anyone at Sony. I wouldn't know that.

has to use the words, quote, "sexual harassment," end quote to legally qualify as a complaint of sexual harassment?

MR. SCHUSTER: Objection.

MS. PORTER: Objection.

A. No.

MS. HUDSON: No further questions.

MS. PORTER: I have one follow-up question for the witness, if that's okay.

EXAMINATION

BY MS. PORTER:

Q. Ms. Slate, do you recall earlier counsel asked you about a series of rumors regarding Ms. Lively?

A. Yes.

Q. Do you have anything else you would like to add regarding that line of questioning?

MR. SCHUSTER: Just note my objection.

THE WITNESS: What's that?

MR. SCHUSTER: No, I just noted an objection for the record.

A. Yes. I just wanted to make clear after thinking about it, just to make it clear,

that in no way do I condone being unkind to people. You know, a toxic work place, certainly not, you know, celebrating or getting married on a slave plantation. I certainly do not think that those are good things that people should do, but when the context is what feels like, kind of, like a quick output of things that I can't corroborate that feel like rumors to me, I don't know if they are true or the context or what happened and I wasn't there, I can't comment on -- truthfully on how that would change my opinion of the person, but it doesn't mean at all that I condone those -- you know, those things generally.

Q. And you don't have any knowledge one way or the other about any of -- about the rumors that were -- you were asked about a series of questions, you don't have knowledge one way or the other about the context or the veracity of any of those rumors?

A. I don't.

MS. PORTER: No further questions from me.

MR. SCHUSTER: Thank you.

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THE VIDEOGRAPHER: Am I safe to close out the video for the day?

MR. SCHUSTER: Yes.

MS. HUDSON: Yes.

THE VIDEOGRAPHER: We are going off the record. The time is 6:48 p.m. and this concludes the testimony given of Jenny Slate. The total number of media unit used was seven and will be retained by Veritext Legal Solutions.

Thank you everyone and have a good evening.

(Time noted: 6:48 p.m.)

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A C K N O W L E D G M E N T

STATE OF :
:ss
COUNTY OF :

I, JENNY SLATE, hereby certify that I have read the transcript of my testimony taken under oath in my deposition on the 26th day of September, 2025; that the transcript is a true, complete record of my testimony and that the answers on the record as given by me are true and correct.

JENNY SLATE

Signed and subscribed to before me this day of , 2025.

Notary Public of the State of

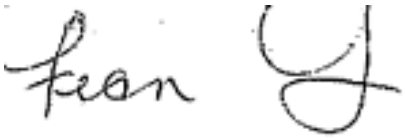
C E R T I F I C A T E

I, FRAN INSLEY, hereby certify that the Deposition of JENNY SLATE was held before me on the 26th day of September, 2025; that said witness was duly sworn before the commencement of testimony; that the testimony was taken stenographically by myself and then transcribed by myself; that the party was represented by counsel as appears herein;

That the within transcript is a true record of the Deposition of said witness;

That I am not connected by blood or marriage with any of the parties; that I am not interested directly or indirectly in the outcome of this matter; that I am not in the employ of any of the counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 27th day of September, 2025.



FRAN INSLEY