

EXHIBIT 3

Part 3

123. When media sources made direct inquiries regarding potentially unflattering stories about Mr. Baldoni specifically, Ms. Nathan, Ms. Abel, and their teams worked to suppress those stories.

124. For example, on August 7, 2024, TAG indicated their intent to leverage “social” to “quiet/kill” media coverage regarding public suspicions regarding Mr. Baldoni’s disconnect from the Film’s cast.

125. On August 9, 2024, Ms. Nathan sent Ms. Abel two links to articles—one from the Hollywood Reporter entitled “*Did Blake Lively, Justin Baldoni Have a Rift Over ‘It Ends With Us’? Sleuthing TikTokers Think So,*” and one from the Daily Mail entitled “*Disturbing TRUTH behind why Blake Lively and her It Ends With Us stars are feuding with Justin Baldoni.*”²¹

126. The Daily Mail article reports on allegations that “Justin Baldoni was ‘chauvinistic’ and ‘borderline abusive’ on the set of *It Ends with Us*,” and discusses this and other claims with respect to the Film and its cast in detail.²²

127. Ms. Abel stated to Ms. Nathan, "I can tell you've done a lot of work here," and continued, "*Nothing about being unsafe. Fat comments. Sexual.*" She concluded, "Thank fucking god."

From: Jennifer Abel (owner)
To: Melissa Nathan

I can tell you've done a lot of work here

Priority: Normal

09/08/2024 17:21:04(UTC+0)

²¹ Carly Thomas, *Did Blake Lively, Justin Baldoni Have a Rift Over 'It Ends With Us'?* Sleuthing TikTokers Think So

The Hollywood Reporter (Aug. 8, 2024, 6:09 PM) <https://www.hollywoodreporter.com/movies/movie-news/blake-lively-justin-baldoni-it-ends-with-us-drama-what-we-know-1235969708/>; James Vituscka & Lillian Gissen, *Disturbing TRUTH behind why Blake Lively and her It Ends With Us stars are feuding with Justin Baldoni*, Dailymail.com (Aug. 9, 2024, 12:52 EDT), <https://www.dailymail.co.uk/tvshowbiz/article-13727789/it-ends-blake-lively-justin-baldonifeud.html>.

²² Vituscka & Gissen, *supra* n. 21.

1
2 From: Jennifer Abel (owner)
To: Melissa Nathan

3 Nothing about being unsafe. Fat comments. Sexual.
4 Priority: Normal

5
6 09/08/2024 17:21:17(UTC+0)

7 From: Jennifer Abel (owner)
8 To: Melissa Nathan

9 Thank fucking god
Priority: Normal

10 09/08/2024 17:21:23(UTC+0)

11 128. On August 8, 2024, Ms. Abel stated that the situation had moved “from just
13 monitoring and scenario planning . . . to [Ms. Nathan] and me having to have an off the record conversation
with outlets such as the today show.” Ms. Abel noted that because of Ms. Nathan’s relationships, those
outlets were being “kept at bay.”

14 129. On August 9, 2024, Ms. Nathan indicated to Ms. Abel that she was on the phone
15 with her sister, Sara Nathan, a journalist at the New York Post and contributor at *Page Six*, and remarked
16 that Mr. Baldoni’s religion should be taken “out” from media coverage. She went on to state, “And mostly
17 The [sic] **misogynistic**.”

18
19 From: Melissa Nathan
To: Jennifer Abel (owner)

20 Bahai needs to be out
And mostly
The misogynistic
Priority: Normal

21 09/08/2024 17:29:30(UTC+0)

22 23 130. Later the same day, Ms. Nathan texted Ms. Abel a link of an article on *Page Six* by
24 Sara Nathan entitled “*Truth behind ‘It Ends With Us’ feud rumors: Justin Baldoni made Blake Lively*
25 ‘uncomfortable,’ sources say,” stating, “I knew she would keep uncomfortable.”²³

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28 ²³ Sara Nathan, *Truth behind ‘It Ends With Us’ feud rumors: Justin Baldoni made Blake Lively ‘uncomfortable,’ sources say*, PageSix, (Aug. 9, 2024, 4:50 PM EDT) <https://pagesix.com/2024/08/09/entertainment/justin-baldoni-made-blake-lively-uncomfortable-sources/>.

1 131. On August 9, 2024, Ms. Abel and Ms. Nathan discussed suppressing two stories
2 that report Ms. Lively was “uncomfortable” on the set.

3 132. Ms. Nathan texted, “ALL Press is so overwhelming. We've [sic] confused people.
4 So much mixed messaging. It's actually really funny if you think about it . . .”

6
7 From: Jennifer Abel (owner)
To: Melissa Nathan

8 So are we in the clear now?!

9 Priority: Normal

10 09/08/2024 23:00:50(UTC+0)

11 From: Jennifer Abel (owner)
To: Melissa Nathan

12 Did we survive?!

13 Priority: Normal

14 09/08/2024 23:00:53(UTC+0)

15 From: Melissa Nathan
To: Jennifer Abel (owner)

16 We survived

17 Priority: Normal

18 09/08/2024 23:00:57(UTC+0)

19 From: Melissa Nathan
To: Jennifer Abel (owner)

20 ALL Press is so overwhelming
We've confused people

21 So much mixed messaging

22 Priority: Normal

23 09/08/2024 23:03:21(UTC+0)

24 From: Melissa Nathan
To: Jennifer Abel (owner)

25 It's actually really funny if you think about it

26 Priority: Normal

27 09/08/2024 23:03:39(UTC+0)

133. Ms. Nathan further texted Ms. Abel that the “worst is over” and that Mr. Baldoni likely would not be “cancelled,” corroborating that the nature of the ongoing campaign was designed to harm Ms. Lively and conceal Mr. Baldoni’s conduct on set.

From: Melissa Nathan
To: Jennifer Abel (owner)

I really think the worst is over. I do think the next few months definitely will be a tiny bit bumpy but not cancelled

Priority: Normal

09/08/2024 23:05:33(UTC+0)

134. The following day, Ms. Abel stated that "The narrative online is so freaking good and fans are still sticking up for Justin and there literally has been no pickup of those two articles which is actually shocking to me. ***But I see this as a total success, as does Justin. You did such amazing work.***" Ms. Nathan responded, "So did you."

From: Jennifer Abel (owner)
To: Melissa Nathan

Hal Yes I had some people text me too and I just didn't respond. The narrative online is so freaking good and fans are still sticking up for Justin and there literally has been no pickup of those two articles which is actually shocking to me. But I see this as a total success, as does Justin.

10/08/2024 02:25:06 (UTC+0)

From: Jennifer Abel (owner)
To: Melissa Nathan
You did such amazing work
Priority: Normal

10/08/2024 02:25:13(UTC+0)

From: Melissa Nathan
To: Jennifer Abel (owner)

Narrative is **CRAZY** good
So did you.

Priority: Normal

10/08/2024 02:25:45(UTC+0)

1 135. Ms. Nathan texted later that same day, “The majority of socials are so pro Justin
 2 and I don’t even agree with half of them lol[.]”
 3

4 From: Melissa Nathan
 To: Jennifer Abel (owner)

5 The majority of socials are so pro Justin and I don’t even agree with half of them lol
 Priority: Normal

6 10/08/2024 16:34:59(UTC+0)

7 136. She continued, “I mean, that was just a lot of work just talking everyone off the
 8 fucking ledge for those two pieces[.]” Ms. Nathan followed up again, texting, ““He doesn’t realise how
 9 lucky he is right now[.] [W]e need to press on him just how fucking lucky[.] *The whispering in the ear[,]*
 10 *the sexual connotations like Jesus fucking Christ[.] Other members feeling uncomfortable watching*
 11 *it[,] I mean there is just so much.”*
 12

13 From: Melissa Nathan
 To: Jennifer Abel (owner)

14 He doesn’t realise how lucky he is right now we need to press on him just how fucking
 lucky
 Priority: Normal

15 10/08/2024 16:39:19(UTC+0)

16 From: Melissa Nathan
 To: Jennifer Abel (owner)

17 The whispering in the ear the sexual connotations like Jesus fucking Christ
 Other members feeling uncomfortable watching it I mean there is just so much
 Priority: Normal

18 10/08/2024 16:39:44(UTC+0)

19 From: Jennifer Abel (owner)
 To: Justin Baldoni

20 Nothing. Very very little pickup. Fans remain supportive of you and believe the issue of the
 “feud” is because she took control of the movie
 Priority: Normal

21 11/08/2024 18:20:22(UTC+0)

137. The following day, Ms. Abel confirmed to Mr. Baldoni that there had been “Nothing. Very very little pickup” and that fans “believe the issue of the ‘feud’ is because she took control of the movie.”

138. Earlier, on August 9, 2024, Ms. Nathan had shared with Ms. Abel that she had been informed “we are crushing it on Reddit.”

From: Melissa Nathan
To: Jennifer Abel (owner)
" we are crushing it on Reddit "
Jed
Priority: Normal
09/08/2024 17:49:57(UTC+0)

139. Ms. Nathan's reference to "Jed," is a reference to Mr. Jed Wallace, an independent contractor based in Austin, Texas, who was retained by TAG to perform social media services on behalf of Wayfarer and Mr. Baldoni in connection with TAG's engagement. The quotation appears to be a reference to efforts by Mr. Wallace to seed and influence online forums on Reddit attacking Ms. Lively and defending Mr. Baldoni.

140. The same day, an employee of TAG texted a link to a salacious story about Ms. Lively's family and noted, “[t]he tides are swirling around Ryan now FYI.” Along these same lines, the team had previously shared an upsetting TikTok video which called for Blake “to divorce Ryan,” writing, “[y]ou guys will love this.” TAG then described this post as “[v]ery helpful.”

From: Jennifer Abel (owner)
To: You guys will love this: <https://www.tiktok.com/@ZTNgyTu68/>
Basically saying that Blake needs to divorce Ryan because he's made her into a meme.
He's ruining her biggest movie of the year, forcing her to ostracize Justin, rewriting the script etc.
Priority: Normal

1 141. On August 10, 2024, Ms. Nathan stated to Ms. Abel that “socials are really really
 2 ramping up.” She continued, “*It’s actually sad because it just shows you have [sic] people really want*
 3 *to hate on women.*”

4
 5 From: Melissa Nathan
 To: Jennifer Abel (owner)
 6 And socials are really really ramping up
 Priority: Normal
 7 10/08/2024 16:41:23(UTC+0)

8 From: Melissa Nathan
 To: Jennifer Abel (owner)
 9 It's actually sad because it just shows you have people really want to hate on
 women
 10 Priority: Normal
 11 10/08/2024 16:41:38(UTC+0)

12 142. The same day, a member of the TAG team advised of “a shift on social, due largely
 13 to Jed and his team’s efforts to shift the narrative towards shining a spotlight on Blake and Ryan.”

14
 15 From: Jennifer Abel (owner)
 To:
 16 Hi team — so far, extremely limited pickup on Daily Mail or Page Six. We'll continue to keep
 an eye out and send pieces as needed, but so far it's been steady coverage on pure
 speculation. We've also started to see a shift on social, due largely to Jed and his team's
 efforts to shift the narrative towards shining a spotlight on Blake and Ryan. Again we'll
 continue to send links and screenshots but wanted to send an update in the meantime.
 Priority: Normal
 17 10/08/2024 16:35:40(UTC+0)

18 143. Further, Ms. Nathan and her team at TAG helped generate or otherwise influence
 19 the content put forth by various TikTok accountholders.

20 144. During the same period of time, Ms. Nathan, Ms. Abel, and their teams were
 21 “heavily monitoring,” had “friendlies updating” them, and sought to address unflattering commentary
 22 regarding Mr. Baldoni, while augmenting the spread of stories that were favorable to Mr. Baldoni.

23 145. For example, on August 9, 2024, Ms. Abel circulated a screenshot of a post by a
 24 woman stating, “Justin, the creator of a show called My Last Days, exploits the struggles of individuals
 25 facing terminal illnesses for his own gain. He found my friend, who is battling a serious illness, and

1 followed her life closely. Despite her grace in not speaking ill of him, I sensed from the start that
 2 something was deeply wrong. Justin weaponizes therapeutic language, presenting himself as thoughtful
 3 and supportive, yet his actions reveal a very different reality. He portrays himself as an ally to women
 4 and the vulnerable, but it's all a façade—he manipulates the vernacular of care to mask his true intentions.
 5 In reality, none of the proceeds from the show benefited the individuals he profiled. He even had the
 6 audacity to depict her hometown, a vibrant and affluent community, as a small, impoverished town. His
 7 portrayal was not just inaccurate but insulting. Once the show aired, Justin took his profits and vanished,
 8 leaving nothing but a sense of exploitation in his wake. His behavior was not just tacky and gross—it was
 9 a betrayal of the very people he claimed to uplift.”

11 146. In response to the article, Ms. Abel stated, “I’m assuming this is not true in the
 12 slightest . . . Either way, ***we’ve flagged to Jed and his team for more serious action on the social side.***”

14
 15 From: Jennifer Abel (owner)
 16 I'm assuming this is not true in the slightest — this girl is on a very dangerous crusade to
 more followers. Either way, ***we've flagged to Jed and his team for more serious action on the***
 social side. We'll monitor heavily for any shift in narrative seen based on this narrative re My
 Last Days and any other commentary on it.

17 Priority: Normal

18 08/08/2024 00:38:58(UTC+0)

19 147. Similarly, on August 13, 2024, the team discussed ways to use the “digital team”
 20 to “amplify []” positive stories about Mr. Baldoni.

21 148. Likewise, on August 18, 2024, an employee of TAG suggested that they “***chat with***
 22 ***Jed***” in response to other allegations made online regarding Mr. Baldoni.

23
 24 From:
 25 To:
 26 To:
 27 To:
 28 To:

So this girl is claiming that Justin invited her up to his hotel room years ago... I didn't want to
 share the vid but did a screen record and this is her account so you guys can look at it.
 Part of me wants his former assistant, to comment and say this never happened.
 Ridiculous.

Priority: Normal

18/08/2024 15:13:01(UTC+0)

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From:
To: Melissa Nathan
To: Jennifer Abel (owner)

Let us chat to Jed as well on this

Priority: Normal

18/08/2024 15:30:54(UTC+0)

149. On any occasion, any member of Wayfarer or the social “manipulation” team could text the link to a positive story about Mr. Baldoni, or a negative story about Ms. Lively, and ask that someone “boost” the story to the public, or “engag[e] in the comments” to fuel the desired narrative.

150. On August 18, 2024, Mr. Baldoni circulated a TikTok video in which the poster criticized Ms. Lively for not speaking about domestic violence in press interviews. A member of Ms. Nathan’s team responded that she would “let digital know.”²⁴

151. During the same period of time, when media sources inquired about HR complaints that were made on the set of the Film, Ms. Nathan, Ms. Abel, and their teams worked to suppress coverage of these HR complaints.

152. Further, on or around August 14, 2024, media outlets directly inquired about HR complaints made on set because they were “being told there were at least three HR complaints filed against Justin Baldoni on the set of ‘It Ends With Us’” and inquired “if the complaints were investigated and what the results were.”

153. By this time, individuals at TAG, Ms. Nathan, and Ms. Abel were aware of the existence of HR complaints, and sought clarity as to the specific HR complaints at issue in order to better counter them in the press.

²⁴ See @thickjewishgirl, TikTok, <https://www.tiktok.com/@thickjewishgirl/video/7404186295993453870>, (Aug. 17, 2024).

1
From:2
To:3
To:Melissa Nathan
Jennifer Abel (owner)4
Hey guys re the tmz thing re the HR complaints — our understanding is that 2 were from
5
Blake and _____ re the "sexy" comment. Is the additional one from _____ re the thing with
6
Jamey and her apartment in nyc? Just want to clarify.7
Priority: Normal8
14/08/2024 19:02:28(UTC+0)9
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154. Approximately one minute later, Ms. Abel asserted the “need to position” the claims as “claims that are already out there about the kiss and the weight comment,” referencing earlier public reporting by TMZ on Mr. Baldoni’s “lingering” kiss with Ms. Lively and Mr. Baldoni’s comments regarding Ms. Lively’s weight on set.²⁵

From:

Jennifer Abel (owner)

To:

To:

To:

To:

To:

I think we need to position it as the claims that are already out there about the kiss and the weight comment

Priority: Normal

14/08/2024 19:03:32(UTC+0)

155. On or around the same date, Ms. Nathan directly engaged with several media platforms, discussing the issue of the HR complaints made against Mr. Baldoni while on the set of the Film.

156. On August 15, Ms. Nathan texted Ms. Abel that “DM hounded me re[:] HR complaints.” She stated that “DM” is not running any content about it, continuing “Jen, this went so well I am fucking dying[.] I have to call you later in a bit and tell you how this went. It was genius. So okay, ***we have the four majors standing down on HR complaint [sic].*** I think we are fine on that bit.”

157. During the same period of time, Ms. Nathan and her team at TAG planted or otherwise were involved in generating or influencing the content publicly put forth on social media,

²⁵TMZ, *Blake Lively, Justin Baldoni She Felt Kissing Scene Lingered Too Long ... Feels He Fat-Shamed Her* (Aug. 14, 2024, 7:55 AM), <https://www.tmz.com/2024/08/14/blake-lively-justin-baldoni-fat-shamed-it-ends-with-us/>.

1 including Reddit and TikTok, as well as online media sources.

2 158. For example, on August 13, 2024, various text messages were exchanged between
 3 Ms. Abel and the journalist Sara Nathan (who, as explained above, is Melissa Nathan's sister).²⁶ These
 4 messages consisted of drafts of a story outlining Ms. Lively's role in making final cuts to the Film.
 5

6 159. After Sara Nathan circulated draft language related to Ms. Lively's involvement in
 7 the different cuts of the film, Ms. Abel sent Sara Nathan revisions to the draft, which Sara Nathan offered
 8 to "amend."

9 160. On the same day, an article authored by Sara Nathan, titled *Blake Lively approved*
 10 *final cut of 'It Ends with Us' amid feud with co-star director Justin Baldoni*, was published in *Page Six*,
 11 owned by the New York Post.²⁷

12 161. The article addressed, among other topics, Ms. Lively's role in approving the final
 13 cut of the Film but emphasizes how Ms. Lively "contribut[ed] to almost every aspect of [the Film];" that
 14 her husband "wrote one of the most important scenes in the movie," and that she was "begged" to remove
 15 one of her song choices from the Film, despite Mr. Baldoni's ownership of the "rights to the book via his
 16 production company, Wayfarer."

17 162. The language contained in the article is almost a verbatim copy of the language
 18 exchanged between Sara Nathan and Ms. Abel via text and reflects multiple of Ms. Abel's revisions to
 19 Sara Nathan's original proposed draft.

20 163. TAG publicly shared this article on one or more social media platforms, including
 21 Reddit, prompting various negative comments in relation to Ms. Lively and her husband and the narrative
 22 that Ms. Lively "steamrolled" or "bulldozed" Mr. Baldoni and the Film "for her own personal gain."²⁸

26 ²⁶ Sara Nathan, PageSix, <https://pagesix.com/author/sara-nathan/> (last visited Dec. 11, 2024)

27 ²⁷ Sara Nathan, *Blake Lively approved final cut of 'It Ends with Us' amid feud with co-star director Justin Baldoni*, PageSix
 28 (Aug. 13, 2024, 4:20 PM), <https://pagesix.com/2024/08/13/celebrity-news/blake-lively-approved-final-cut-of-it-ends-with-us-amid-feud/>.

28 ²⁸Somethingfunnynice, Reddit post
https://www.reddit.com/r/Fauxmoi/comments/1erm7jz/exclusive_blake_livelyApproved_final_cut_of_it/?rdt=54494#:~:text=Blake%20Lively%20Approved%20the%20final,end%20result%2C%20multiple%20sources%20 (2024); Fred Steggars, Page

1 164. The very same day, Ms. Nathan sent an article from the Daily Mail entitled “*Is*
 2 *Blake Lively set to be CANCELLED? String of ‘hard to watch’ videos that have surfaced following ‘tone*
 3 *deaf’ Q&A to promote It Ends With Us could tarnish 36-year-old star’s golden Hollywood image for*
 4 *good.*”²⁹

5 165. Ms. Abel stated, “You really outdid yourself with this piece,” and Ms. Nathan
 6 responded, “That’s why you hired me right? I’m the best.”

7 166. Following the August 2024 launch of Ms. Lively’s hair care line, Blake Brown,
 8 which she spent seven years building, the Instagram account of the brand was flooded by harassing and
 9 derogatory comments, including many posted by user accounts that had no followers and no prior posts
 10 (suggesting inauthenticity), and which did not relate to the brand’s products. To take just one example,
 11 one comment posted on the Blake Brown account (by a user that, as of December 19, 2024, shows user
 12 metrics indicating 0 posts, 0 followers, and 0 following), commented: “How about you stop paying the
 13 media to trash and smear Justin that would be a good start you awful human being.” Another user (also
 14 with 0 posts, 0 followers, and 0 following) posted: “We want Justin’s cut of the movie!! He actually care
 15 about DV.”³⁰

16 167. Mr. Baldoni and Mr. Sarowitz, along with Mr. Heath, not only encouraged efforts
 17 to target Ms. Lively and her family, but they went as far as to provide input and ideas on ways to negatively
 18 influence the narrative against Ms. Lively and her family.

22
 23 Six comment, <https://pagesix.com/2024/08/13/celebrity-news/blake-lively-approved-final-cut-of-it-ends-with-us-amid-feud/> (Aug. 13, 2024) (“Sounds like Lively used her power even though he had bought the rights and was the director. And then she pushed him out. It’s obvious all the info comes from her camp.”); IFNOTMEWHO, Page Six comment, <https://pagesix.com/2024/08/13/celebrity-news/blake-lively-approved-final-cut-of-it-ends-with-us-amid-feud/> (Aug. 13, 2024) (“Kinda sounding like a mean girl behind all the makeup and fake smiles. No longer a fan.”).

24
 25 ²⁹ See Alanah Kholsa & Jo Tweedy, *Is Blake Lively set to be CANCELLED? String of ‘hard to watch’ videos that have surfaced*
 26 *following ‘tone deaf’ Q&A to promote It Ends With Us could tarnish 36-year-old star’s golden Hollywood image for good*,
 27 *Dailymail.com* (Aug. 16, 2024, 7:17), <https://www.dailymail.co.uk/femail/article-13749783/Blake-Lively-cancelled-interview-Ends-film.html>.

28 ³⁰ See @judy_bees, Blake Brown Beauty Instagram comment, <https://www.instagram.com/p/C-oLDRqNyOl/?igsh=MWJkbGwxbGplOXo3dQ%3D%3D>, (Aug. 13, 2024), (“How about you stop paying the media to trash and smear Justin that would be a good start you awful human being.”); @ronn.iejac, Blake Brown Beauty Instagram comment, <https://www.instagram.com/p/C-oLDRqNyOl/?igsh=MWJkbGwxbGplOXo3dQ%3D%3D>, (Aug. 13, 2024) (“We want Justin’s cut of the movie!! He actually care about DV.”).

168. For instance, on August 9, 2024—the Film’s release date—after sharing certain
 2 negative articles about himself with Ms. Abel, Mr. Baldoni stated, “there’s no way we can just let this
 3 go.”

169. Additionally, on August 15, 2024, Mr. Baldoni texted Ms. Nathan and Ms. Abel,
 5 stating that his business partner, Mr. Sarowitz, suggested “flipping the narrative” arising from unnamed
 6 sources who had made false claims about Mr. Reynolds’ involvement in the script of the Film, and
 7 suggested ways to manipulate those rumors to make Mr. Reynolds appear to be anti-feminist. There was
 8 no truth to these claims.

11 From: Justin Baldoni
 To: Melissa Nathan
 To: Jennifer Abel (owner)
 12 No worries -
 Quickly
 13 My partner Steve asked about flipping the narrative from this leak this am about ryan saying
 script was a disaster and he saved the movie -
 14 Priority: Normal

15/08/2024 17:58:26(UTC+0)

17 From: Justin Baldoni
 To: Melissa Nathan
 To: Jennifer Abel (owner)
 18 To- something about ryan claiming the female hired was feminist writer didn't know how to
 tackle a female film etc
 Using their own words against them -
 19 Priority: Normal

20 15/08/2024 17:59:16(UTC+0)

22 170. Ms. Nathan assured Mr. Baldoni that “[t]his is an easy flip,” before indicating that
 23 she was already working on a story for Variety that would achieve this goal.

24 171. As of August 16, 2024, Ms. Nathan was continuing to confer with additional
 25 reporters to release stories that would cast Ms. Lively and/or Mr. Reynolds in a negative light.

27 172. Meanwhile, Ms. Lively neither publicly commented nor directed any of her
 28 representatives to comment to or engage with the print media, social media or otherwise about the hostile
 work environment Mr. Baldoni, Mr. Heath and Wayfarer created. Indeed, throughout the time period

1 discussed herein, Ms. Lively did not provide her publicist with details about the hostile work environment
 2 that she, alongside the other cast members and crew, had experienced.

3 173. Moreover, Ms. Lively expressly instructed her publicist not to engage with press
 4 inquiries, including ones regarding the on-set behavior of Mr. Baldoni, Mr. Heath, or Wayfarer.

5 174. Experiencing the very sudden tidal wave of the increasingly negative public
 6 attention building around her, however, Ms. Lively began to suspect that the extraordinarily rapid shift in
 7 public sentiment and press coverage that began *immediately after* the rest of the cast and crew attended
 8 the world premiere was likely orchestrated by the men about whom she had raised HR complaints.

9

10 **G. Mr. Baldoni Retaliated Because HR Complaints Regarding His Behavior Threatened His
 11 Feminist Brand.**

12 175. On information and belief, Mr. Baldoni was desperate to suppress any suggestion
 13 that he engaged inappropriate conduct, much less sexually harassing conduct, because it would entirely
 14 undermine his carefully curated public image as a feminist ally.

15 176. In 2017, Justin Baldoni presented a Ted Talk entitled, “Why I’m Done Trying to
 16 be ‘Man Enough.’” Mr. Baldoni challenged men to “be man enough to stand up to other men when [they]
 17 hear ‘locker room talk,’ when [they] hear stories of sexual harassment.”³¹ Mr. Baldoni asked listeners,
 18 “will you actually stand up and **do something so that one day we don’t have to live in a world where**
 19 **a woman has to risk everything and come forward** to say the words “me too?”³²

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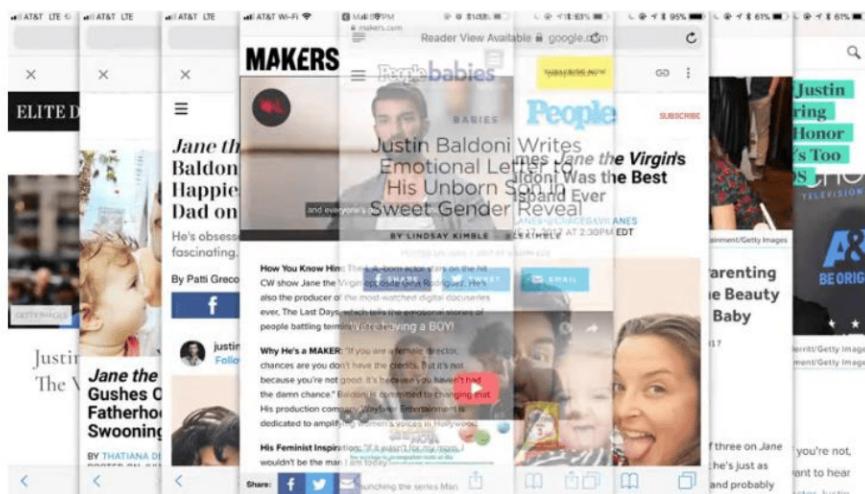
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28 ³¹ Pangambam S, *Justin Baldoni: Why I’m Done Trying to Be “Man Enough” (Transcript)*, The Singju Post (Jan. 16, 2018, 4:45), <https://singjupost.com/justin-baldoni-why-im-done-trying-to-be-man-enough-transcript/?singlepage=1>.

³² *Id.* (emphasis added).

1 177. During the TED Talk, Mr. Baldoni displayed numerous screenshots of media
 2 coverage of himself, from various sources, as examples of his decision to use his “social platform as a
 3 kind of this Trojan horse wherein [he] could create a daily practice of authenticity and vulnerability.” Mr.
 4 Baldoni then claimed “[t]he response has been incredible. It’s been affirming, it’s been heartwarming. I
 5 get tons of love and press and positive messages daily.”³³



Why I'm done trying to be "man enough"

8,678,912 views | Justin Baldoni | TEDWomen 2017 • November 2017

15 178. Around the same time of that TED Talk in 2017, Mr. Baldoni announced the launch
 16 of a male talk show through his media company, Wayfarer Entertainment, called *Man Enough*. Through
 17 that show, Mr. Baldoni sought to have “public conversations on camera that [he] had never seen men
 18 have.”³⁴

20 179. In one episode of his show *Man Enough*, Mr. Baldoni hosted a round table with
 21 “really strong men,” including Mr. Heath and others, in reaction to the #MeToo movement—to
 22 “collectively learn from each other, from experts, and hear firsthand from women and try to figure out
 23 how we can be better allies in our responses and in our actions.”³⁵ In the episode, Mr. Baldoni questions

26 33 Justin Baldoni, *Why I'm Done Trying to be "Man Enough,"* TED, at 8:10–8:28 (Nov. 2017),
 27 https://www.ted.com/talks/justin_baldoni_why_i_m_done_trying_to_be_man_enough?subtitle=en.

28 34 Justin Baldoni, *Man Enough: Undefining My Masculinity*, HARPERONE (2021) at 8; see also *Man Enough*, IMDB,
 29 <https://www.imdb.com/title/tt7754654/> (last visited Dec. 15, 2024).

35 Jamie Primeau, *Justin Baldoni Knows The Most Important Way For Men To Be Better #MeToo Allies Is To Listen*, Bustle
 (July 24, 2018), <https://www.bustle.com/p/justin-baldonis-man-enough-features-a-candid-metoo-conversation-about-how-men-can-be-better-allies-9857238>.

1 the group, “Who at this table has seen something and didn’t say anything . . . I mean objectification,
 2 harassment, and then not said anything?”³⁶

3 180. In 2021, the *Man Enough* franchise added a podcast, also produced by Wayfarer
 4 Studios.³⁷ The *Man Enough* podcast has featured episodes entitled “Strength in Unity: Men Supporting
 5 Women In Leadership,” “From Misogyny’s Victim To Male Privilege . . .,” and “Modern Dating: Consent,
 6 Boundaries And Respect.”³⁸

7 181. Mr. Baldoni stated in his 2017 TED Talk, men “are the problem” they created the
 8 “glass ceiling”;³⁹ and if they want “to be part of the solution, then words are no longer enough.”⁴⁰ By Mr.
 9 Baldoni’s account, he became a “feminist fighting for gender equality . . . so quickly that [he] hadn’t even
 10 realized that’s what [he] was or was trying to do.”⁴¹

11 182. In Mr. Baldoni’s own words, his “activism” “starts in the mirror, with an audience
 12 of one.”⁴² Mr. Baldoni has stated that he “feel[s] a deep responsibility” to “tear down the walls” of “power
 13 and privilege”⁴³ and “believe[s] the world needs men to show up, not in big ways, but in hundreds and
 14 thousands of little ways” to “create a better, more equitable, just world.”⁴⁴

15 183. Over the past approximately seven years, and as relevant to this Complaint, Mr.
 16 Baldoni has made the following statements:

17 (a) “Let’s just shut up and finally listen to the women in our lives.”⁴⁵

22 ³⁶ Man Enough, YouTube, at 12:35 – 12:45 (July 26, 2018), <https://www.youtube.com/watch?v=i21xmCbd8iw&t=1070>.

23 ³⁷ Justin Baldoni, Liz Plank, and Jamey Heath, *The Man Enough Podcast Premiere*, YouTube (June 21, 2021), <https://www.youtube.com/watch?v=EFEEEm9DEy6w#:~:text=New%20episode%20of%20The%20%23ManEnoughPodcast%20every%20Monday%2C,Premiere%20episode%20with%20Karamo%20Brown%20out%20now>.

24 ³⁸ Episode Pages, The Man Enough Podcast <https://manenough.com/podcast/> (last visited Dec. 15, 2024).

25 ³⁹ See Justin Baldoni, *supra* n. 33 at 15:45–15:51. Regarding the “glass ceiling,” in a recent interview, Mr. Baldoni stated that “[d]irecting is a very lonely job” because he was “at the top of the totem pole”—all without acknowledging that Ms. Lively’s cut of *It Ends With Us* was released, not his. See *How to Fail With Elizabeth Day*, Dec. 3, 2024, <https://podcasts.apple.com/gb/podcast/how-to-fail-with-elizabeth-day/id1407451189>.

26 ⁴⁰ See Justin Baldoni, *supra* n.33 at 15:52–15:55.

27 ⁴¹ Justin Baldoni, *supra* n.34 at 8.

28 ⁴² *Id.* at 24.

⁴³ *Id.* at 1.

⁴⁴ *Id.* at 24.

⁴⁵ *Id.* at 11.

(b) “[M]en are going to have to start doing now is recognizing when they [made women uncomfortable] and didn’t realize it. I think that’s when the other side of the ‘Me Too’ movement is ‘I’m Sorry.’”⁴⁶

(c) “Growing up, how many times did I hear ‘bros before hoes?’ . . . [H]ow demeaning, how sexist . . . We’ve built this system—the opposite of accountability—and now it’s time to figure out how, as men, we can break that system, and it starts with showing what a real man is. A real man is someone that says, ‘Hey man, we’re still friends, but that’s not cool.’”⁴⁷

(d) "Imagine . . . being sexually assaulted, finally coming forward about this traumatic thing that has happened to you . . . and having people acting like *you* were to blame."⁴⁸

(e) “[I]t’s important for us men to realize how crucial a role bystanders can play in stopping and preventing assault and harassment, how we must be a part of the movement and call for respect and equality for women, act upon that call to action, and continue to perpetuate positive behaviors among ourselves and our communities.”⁴⁹

(f) "Are you confident enough to listen to the women in your life . . . And will you be man enough to stand up to other men when you hear 'locker room talk', when you hear stories of sexual harassment?"⁵⁰

(g) "All of us have a situation, or a pattern that we need to end the cycle of."⁵¹

⁴⁶ Laurel Pinson, *Jane the Virgin' Star Justin Baldoni Wants to End Toxic Masculinity: 'The Glass Ceiling Exists Because Men Put It There*, GLAMOUR (Dec. 4, 2017), <https://www.glamour.com/story/jane-the-virgin-star-justin-baldoni-wants-to-end-toxic-masculinity>.

47 *Id.*

⁴⁸ Justin Baldoni, *Boys Will Be Human: A Get-Real Gut-Check Guide to Becoming the Strongest, Kindest, Bravest Person You Can Be*, HARPERCOLLINS (2022) at 242–43.

⁴⁹Leah Fessler, *Actor Justin Baldoni has crucial advice for men who've offended women, but still want to be feminists*, Quartz (Oct. 30, 2018), <https://qz.com/work/1408444/hww4-justin-baldoni/>.

⁵⁰ Dressember, *A TEDTALK REVIEW OF JUSTIN BALDONI'S 'WHY I'm DONE TRYING TO BE MAN ENOUGH'*, (2017) <https://www.dressember.org/blog/justinbaldonitedtalk>.

⁵¹ *Justin Baldoni Talks "It Ends with Us" movie adaptation*, CBS Mornings, (Aug. 7, 2024), <https://www.cbsnews.com/video/justin-baldoni-talks-it-ends-with-us-movie-adaptation/>.

1 (h) "First of all, I want men to stop asking the question, why do women stay. I want
 2 men to take accountability. I want men to hold other men accountable."⁵²

3 (i) "[T]here's never an excuse, no matter how much trauma a man has, there is never
 4 an excuse to lay hands and hurt a woman, physically or emotionally. And we have to also understand that
 5 the majority of domestic violence isn't physical, these are, the scars are invisible, these are things that,
 6 you know it's emotional it's gaslighting, it's all of the various things that so many people experience."⁵³

7 (j) "I think we judge enough women and victims . . . but the real question is, why do
 8 we keep allowing men to harm . . ."⁵⁴

9
 10 184. In sum, Mr. Baldoni has crafted a public image of himself as not just an ally, but
 11 also a fierce advocate for women. Contrary to this image, as set forth in detail above, Mr. Baldoni has
 12 spent the last several months and significant resources on his goal of wanting to "bury" and "destroy" Ms.
 13 Lively for raising concerns about his and his CEO's harassing behavior and other disturbing conduct.

14
 15 **G. Ms. Lively, Her Family, and Her Businesses Have Suffered and Have Been Substantially
 16 Harmed By the Wayfarer Parties' Conduct.**

17 185. While there was considerable online coverage of the Film and Ms. Lively leading
 18 up to the Film's nationwide release in U.S. theaters on August 9, 2024, that coverage was mostly neutral.
 19 Some online discussions referenced an apparent "feud" between the cast members, but they included a
 20 smaller percentage of negative and positive mentions.

21 186. Soon, however, Ms. Lively and her team became aware of an increase in negative
 22 media articles and social media coverage about her.

23
 24
 25
 26
 27
 52 *Id.*

28 53 *Justin Baldoni Reflects On Experience Of Directing & Acting In 'It Ends With Us'*, AccessDaily via
 AccessHollywood (Dec. 5, 2024) <https://www.accessonline.com/videos/justin-baldoni-reflects-on-experience-of-directing-acting-in-it-ends-with-us>.

54 *Id.*