

# Exhibit 4

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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,

Plaintiff,

vs.

CASE NO. 24-CV-10049-LJL (LEAD CASE)

25-CV-449 (LJL) (MEMBER CASE)

WAYFARER STUDIOS LLC, ET AL.

Defendants.

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JENNIFER ABEL,

Third-party Plaintiff,

vs.

JONESWORKS, LLC,

Third-party Defendant.

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WAYFARER STUDIOS LLC, et al.

Consolidated Plaintiffs,

vs.

BLAKE LIVELY, et al.

Consolidated Defendants.

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VIDEO-RECORDED DEPOSITION OF JAMEY HEATH

Los Angeles, California

Wednesday, October 8, 2025

Stenographically Reported by: Ashley Soevyn,  
CALIFORNIA CSR No. 12019

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1 Q Are you refusing to answer questions  
2 unless you read this entire document?

3 MS. SHAPIRO: Objection.

4 THE WITNESS: If you're going to ask me  
5 something about a document, I just want to be able  
6 to read it.

7 BY MS. HUDSON:

8 Q I -- go ahead. Finish reading it.  
9 You've already read about half of it. You can  
10 finish.

11 A No, I hadn't. I would like to read it.  
12 If you're going to ask me, I just -- I just want to  
13 be -- understand what I'm responding to.

14 MS. HUDSON: Okay. Let's go off the  
15 record.

16 MS. SHAPIRO: We're not going off the  
17 record.

18 MS. HUDSON: I'm taking a break. Yes, we  
19 are.

20 MS. SHAPIRO: We're not going off the  
21 record.

22 MS. HUDSON: Yes, we are. Yes, we are.  
23 It's not up to you. This is my deposition. We're  
24 going to go off the record.

25 MR. BACH: How much time is left?

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1 MS. SHAPIRO: There's six-minutes left.

2 Oh, sorry, seven minutes.

3 MS. HUDSON: Okay. I have seven minutes.

4 THE VIDEOGRAPHER: Nine minutes left.

5 MS. HUDSON: Nine. There you go. We're  
6 gonna take a 10-minute break. We'll come back for  
7 the last nine.

8 MR. BACH: Let's make a record before you  
9 go. Let's make a record.

10 (Cross talk.)

11 MS. HUDSON: Not on the record. Not on  
12 my time.

13 MR. BACH: Can we go on the record?

14 MS. HUDSON: Absolutely not. Okay. You  
15 can go on the record and make any statement you  
16 want --

17 MR. BACH: I'm going to go on the record.

18 MS. HUDSON: -- but you're not taking my  
19 nine minutes. I'm not -- you are not taking my nine  
20 minutes to make a record.

21 MS. SHAPIRO: So you can ask more  
22 questions about a dead former client of one of the  
23 lawyers in this case?

24 MS. HUDSON: If you want to make a --

25 MS. SHAPIRO: And how is that -- how is

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1       that proper?

2                   MS. HUDSON: I understand that you are  
3 new to this case, and you don't understand  
4 everything.

5                   MR. BACH: I want to go on the record. I  
6 don't care whether --

7                   (Cross talk.)

8                   MS. SHAPIRO: I'm new to this case, but  
9 I'm not new to the practice of law. I've been  
10 practicing law for over 30 years. I know the rules,  
11 ma'am.

12                   MS. HUDSON: We're going off the record.  
13 I have nine minutes left, and I'm going to use them  
14 to ask some questions. If you want to make a  
15 record, you can add time and make whatever record  
16 you want.

17                   MR. BACH: Okay.

18                   MS. HUDSON: Okay? Will you agree that  
19 you will -- this is not counting against my nine  
20 minutes?

21                   MR. BACH: That's fine. But I want it on  
22 the record. I want a record of what's happened.

23                   MS. HUDSON: You -- you want a record of  
24 what's happened?

25                   MR. BACH: Yes.

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1 MS. HUDSON: You can make a record if --  
2 if you will --

3 MR. BACH: I would like to, if you will  
4 let me.

5 MS. HUDSON: If -- I will let you if you  
6 will agree that it is not going to impact my nine  
7 minutes.

8 MR. BACH: I've already said fine to  
9 that. Do I need to say it again?

10 MS. HUDSON: Okay. You can make whatever  
11 record you want. I'm going to take a break.

12 MR. BACH: Okay. Can we go on the record  
13 for this?

14 MS. HUDSON: You don't need the video for  
15 this. You can just do it for the --

16 MR. BACH: I'll do it on the video.  
17 We're -- I don't need the video.

18 THE VIDEOGRAPHER: We're still on the  
19 record.

20 MR. BACH: Are we on the record?

21 Yeah, I just want to say, we had a break  
22 less than an hour ago. We made clear to counsel  
23 that we didn't want another break, that this same  
24 witness is being deposed tomorrow. That this  
25 process is exhausting. That he's expected to

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1 testify for another seven hours plus breaks  
2 tomorrow.

3 She came back from a break and part of  
4 her questioning had nothing whatsoever to do with  
5 the claims and defenses in this case. She was  
6 clearly at the point where the questioning becomes  
7 optional and rhetorical, and she engaged in a series  
8 of questions aimed to drive a wedge between this  
9 deponent and his lawyer, and to tarnish the  
10 reputation of the lawyer. That is how she has used  
11 her time --

12 MS. HUDSON: This has nothing --

13 MR. BACH: Excuse me. I'm making a  
14 record.

15 MS. HUDSON: Then we are going to excuse  
16 the witness from the room because you are speaking  
17 and coaching the witness right now.

18 MR. BACH: I am not coaching the witness  
19 at all.

20 MS. HUDSON: This is totally  
21 inappropriate. This is totally inappropriate. You  
22 are coaching the witness. You are making a very  
23 long speaking objection. It -- there is no purpose.  
24 There's no judge in the room. Everything that  
25 you're saying is -- you can make an argument about

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1 it. We're not going to do this in front of the  
2 witness.

3 MR. BACH: Technically, a speaking  
4 objection is when there's a question pending and you  
5 object to the question.

6 MS. HUDSON: No.

7 MR. BACH: I'm not objecting to --  
8 (Cross talk.)

9 MS. HUDSON: Speaking on the record is  
10 not permitted like this. You're objecting to the  
11 break. Objection noted. We're taking a break.

12 MR. BACH: All right. This isn't -- this  
13 is silly.

14 MS. HUDSON: Okay.

15 MR. BACH: This is silly.

16 MS. HUDSON: I do not want you to coach  
17 the witness anymore and --

18 MS. SHAPIRO: We're not coaching the  
19 witness.

20 MS. HUDSON: -- make other statements on  
21 the record about the witness. If you insist on  
22 doing that, the witness should leave the room.  
23 Okay?

24 MR. BACH: I am going to defer to you in  
25 every respect. Whatever I need to do to let you

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1 make my statement on the record, I'm going to do.  
2 Okay?

3 MS. HUDSON: Then you can excuse the  
4 witness from the room if you insist on making this  
5 statement.

6 MR. BACH: Okay. Jamey, go outside. Go  
7 outside, as I continue.

8 After we made clear our concerns about  
9 breaks, the witness is --

10 MS. HUDSON: Yeah. I would like to also  
11 note that you are not the -- the -- you are not the  
12 representative lawyer.

13 MR. BACH: If you cut me off again, I'm  
14 going to call Judge Hyman on the phone now.

15 MS. HUDSON: You want to tell him that  
16 you, who are not defending the deposition, are  
17 wanting to make a ten-minute speaking objection?

18 MR. BACH: Can you let me speak and then  
19 you can make whatever speech you want about me and  
20 you can say whatever you want about me. But you are  
21 going to let me --

22 (Cross talk.)

23 MS. HUDSON: Yeah, Mr. Bach, you are not  
24 defending this deposition. You are a participant  
25 here who has decided to make a speech on the record.

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1 MR. BACH: We're not kids on a  
2 playground. You just said if Mr. Heath left the  
3 room, I could make my statement. Now you're not  
4 letting me make my statement. Can I make my  
5 statement?

6 MS. HUDSON: You can make your statement  
7 over my objection. Okay? That you --

8 MR. BACH: Just let me know when I can  
9 make my --

10 MS. HUDSON: -- you should --

11 MR. BACH: -- statement. I'm just going  
12 to sit here and not say --

13 MS. HUDSON: -- you should not be making  
14 any statement on the record.

15 MR. BACH: -- anything until you tell me  
16 I can make my statement.

17 MS. HUDSON: If you -- you are disrupting  
18 the deposition in order to make a statement as the  
19 non-defending lawyer in this deposition.

20 MR. BACH: Are you done?

21 MS. HUDSON: And if you -- I don't agree.  
22 I excused the witness. If you want to continue, I'm  
23 just going to let you do this so we can finish this  
24 deposition. And then we're going to take a break,  
25 and we're going to take our last nine minutes. So

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1 if you want to make this statement, for whatever  
2 reason, go ahead.

3 MR. BACH: Are you done?

4 MS. HUDSON: I am done.

5 MR. BACH: Okay. Can I talk?

6 MS. HUDSON: You can talk.

7 MR. BACH: Okay.

8 As I've been saying, after we made clear  
9 that we're concerned about the breaks, we're  
10 concerned about the witness being tired, the next  
11 line of questioning had to do -- had nothing to do  
12 with the case, but simply had to do with the client  
13 and his lawyer and trying to drive a wedge. And  
14 now, the questioning lawyer wants to take yet  
15 another break. It's clear from the content of her  
16 questioning that she's no longer focused on the  
17 merits of the case, and that she's conducted her  
18 substantive questioning.

19 I don't see another need for a break. I  
20 think the deposition is practically over. The  
21 client is tired and has to go tomorrow. I think  
22 this is abusive. I think it's unnecessary, and I  
23 object.

24 MS. HUDSON: All right. Ten minutes.  
25 Off the record. Thank you.

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REPORTER'S CERTIFICATE

I, ASHLEY SOEVYN, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was put under oath by me;

That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That a review of the transcript by the deponent was/ was not requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 10th day of October 2025.



ASHLEY SOEVYN

CSR No. 12019