

# EXHIBIT H

CONFIDENTIAL

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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.

---

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           A       That would be Brian Singer.

2           Q       Do you know how Wayfarer funds its  
3 operations at operating at a net loss of  
4 \$18 million?

5                   MS. SHAPIRO: Objection.

6                   THE WITNESS: Yeah.

7 BY MS. HUDSON:

8           Q       How does it do that?

9           A       Steve's investments.

10          Q       So when Wayfarer needs funding, it looks  
11 to Steve Sarowitz to provide cash?

12                   MS. SHAPIRO: Objection.

13                   THE WITNESS: There has been a payment --  
14 a funding schedule that he had committed to. And  
15 based on that funding, that is what allows Wayfarer  
16 to operate.

17 BY MS. HUDSON:

18          Q       Do you have a contract with Mr. Sarowitz  
19 to provide funding at a certain rate for the  
20 company?

21                   MS. SHAPIRO: Objection.

22                   THE WITNESS: I don't know.

23 BY MS. HUDSON:

24          Q       If Mr. Sarowitz decided not to continue  
25 to provide the funding, would Wayfarer be able to

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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;

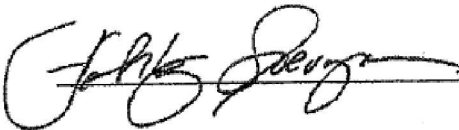
That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

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

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VIDEO-RECORDED DEPOSITION OF JAMEY HEATH

Los Angeles, California

Thursday, October 9, 2025

Stenographically Reported by: Ashley Soevyn,

CALIFORNIA CSR No. 12019

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1 have impact whether or not they make money. Of  
2 course we have to make money, but that's not our  
3 primary goal.

4 Q Is Wayfarer profitable?

5 A No.

6 Q Has it ever been?

7 A No.

8 Q I believe Mr. Sarowitz testified that  
9 Wayfarer is paying for the litigation fees and  
10 expenses of the various defendants in these two  
11 related litigations; is that correct?

12 A I don't know about -- well, the  
13 defendants, yes, we are paying for those.

14 Q And that includes litigation fees and  
15 expenses for Mr. Baldoni's defense?

16 A It does.

17 Q And for Ms. Abel's defense?

18 A It does.

19 Q And for Ms. Nathan's defense?

20 A It does.

21 Q And for Wayfarer's defense?

22 A Yes.

23 Q For Mr. Wallace's defense?

24 A Yes. Sorry. I just needed to -- there  
25 is a lot of expenses, so I'm just making sure.

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