

Exhibit 1

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Case No. 24-CV-10049-LJL
(LEAD CASE)

vs.

Case No. 25-CV-449 (LJL)
(MEMBER CASE)

WAYFARER STUDIOS LLC

ET AL. 4

Defendants.

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.

** CONFIDENTIAL **

VIDEO-RECORDED DEPOSITION OF MARGARET COLLEEN HOOVER, produced as a witness at the instance of the Plaintiff and duly sworn, was taken in the above-styled and numbered cause on Monday, September 29, 2025, from 10:05 a.m. to 6:30 p.m., before Kari Behan, CCR, CSR, a Texas certified machine shorthand reporter, at the offices of Ramey & Flock, P.C., 100 East Ferguson Street, Suite 500, Tyler, Texas 75702, Pursuant to Notice and the provisions stated on the record herein.

Job No. 7584405

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1 A. Yes.

2 Q. And why did you write that book? What inspired
3 you?

4 A. My mother and my father were married until I
5 was two, and I know that she suffered physical abuse at
6 the hands of him. And it was always very confusing to
7 me how that relationship happened, because my mother is
8 an extremely strong and independent woman. And I
9 decided to put myself in her shoes for -- with the book
10 and, you know, kind of understand why women stay as long
11 as they do or why they find it hard to leave. I --
12 I -- it was loosely based on my mom and my father's
13 story.

14 Q. So were you modeling the character of Lily as a
15 strong, independent woman after your mother?

16 A. Yes.

17 Q. Now, the book became popular on the BookTok
18 community on TikTok, right?

19 A. Yes.

Q. What is BookTok?

21 A. BookTok is a -- kind of a hashtag they use on
22 TikTok to describe when people are --

23 (Off-record discussion.)

24 THE WITNESS: Should I pause for a second?

25 MS. ZELDIN: No. It's okay. Keep going.

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1 A. Yes.

2 Q. You talk a little bit here about the nonprofit
3 that you -- that you founded. Is that the Bookworm Box?

4 A. Yes.

5 Q. And then you mentioned a 501(c)(3) called Book
6 Bonanza?

7 A. Yes.

8 Q. What is Book Bonanza?

9 A. Book Bonanza -- well, the 501(c)(3) was called
10 the Bookworm Box. Book Bonanza was an event that we
11 started to help raise funds for the -- for the Bookworm
12 Box. It was a signing that went on for -- we did it
13 once a year for five or six years. I can't remember the
14 exact date.

15 Q. And you said it's a signing?

16 A. Uh-huh.

17 Q. How many people typically come to Book Bonanza?

18 A. Probably 3,000, including the authors.

19 Q. So other authors in addition to yourself attend
20 Book Bonanza?

21 A. About 200.

22 Q. And do people pay an admission price?

23 A. Yes.

24 Q. That's how you fundraise?

25 A. Yes. And we do sponsors.

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1 him on April 11th and talk a little bit about your fears
2 and what you've learned about him, correct?

3 A. Yes.

4 Q. And at the top you say: My big fear is I'll
5 option to someone who thinks it's a hot romance and
6 they'll take it in absolute wrong decision.

7 A. Yes.

8 Q. Why was that your big fear?

9 A. I feel like the film or the book had a good
10 message, and romance has a stigma that every romance
11 novel is just about sex, and I wanted to make sure that
12 that wasn't the film they would be making.

13 Q. You didn't want it to be focused on sex?

14 A. Right. I wanted it to reflect the book.

15 Q. And would the -- in your view, the theme of the
16 book be more female empowerment than sex?

17 A. Yes.

18 Q. And then in the next paragraph, you talk about
19 the fact that one of the film options that you
20 previously did was not a great experience. I think you
21 mentioned that before.

22 A. Yes.

23 Q. So you were letting Mr. Baldoni know this here?

24 A. Yes.

25 Q. And then if you go down to -- oh, gosh -- the

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1 was based on his life and a violation of his copyrights?

2 MS. ZELDIN: Objection.

3 THE WITNESS: I was not aware.

4 BY MS. HUDSON:

5 Q. At some point, did you enter into an agreement
6 to give Wayfarer the film rights for It Ends With Us?

7 A. Yes.

8 Q. And at the time, did you know that Mr. Baldoni
9 would direct it?

10 A. No.

11 Q. What was your understanding, at the time, of
12 who would direct it?

13 A. Well, I knew that, you know, signing the rights
14 was the first step and that they would have to find
15 distribution, a director, other producers. So I -- we
16 really -- it was just the first step, so I didn't know
17 what was to come.

18 Q. And you told --

19 A. But he did not express desire to direct it.

20 Q. So the -- you expressed here that you had hoped
21 a woman would direct it?

22 A. Uh-huh.

23 Q. Did you tell that to Mr. Baldoni?

24 A. Yeah, I believe we had conversations about it.

25 Q. At some point, did you learn that he was going

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1 to be the director?

2 A. Yes.

3 Q. How did you learn?

4 A. At first, I was in a room with him and his
5 whole team the first time I heard he was interested, and
6 he had brought it up in that room, and that was the
7 first time I knew that he wanted to direct it.

8 Q. And what was your reaction when he brought it
9 up?

10 A. I think everyone's reaction was concern, and
11 they expressed it and said that they think it should be
12 a woman who directs it, and there -- the
13 screenwriter -- and I can't remember her name.

14 Q. Christy Hall?

15 A. I believe that's who was in the room. He said:
16 Well, what if we co-directed, she and him? And they
17 spoke on that for a minute or two and didn't decide on
18 what they would do. And so then he asked me directly,
19 after his team had expressed concerns, and asked what I
20 thought about him possibly directing it, and I said that
21 I would prefer a female director, but if that wasn't
22 possible and they couldn't find one, that I felt like,
23 of all men, with him having a -- the platform he did
24 based on women, that he would be one of the few men I
25 would be okay with directing it.

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1 Q. Did Ms. Hall express interest in co-directing
2 the film with Mr. Baldoni at the time?

3 A. I don't recall.

4 Q. And do you recall who from Mr. Baldoni's team
5 was in this meeting?

6 A. No. This was my first time meeting everyone,
7 and there were several people on Zoom on a screen, so it
8 was -- it was a number of people, maybe eight or nine.

9 Q. And do you recall the general sentiment of why
10 there was pushback on the concept of Mr. Baldoni
11 directing?

12 A. Yes, because the film was centered around
13 domestic violence, and everyone was just concerned
14 that -- having a man direct it.

15 Q. When did you learn that the decision had been
16 made and Mr. Baldoni was going to direct it,
17 notwithstanding the concerns?

18 A. I don't recall the date, but I -- he did let me
19 know that -- that he was going to be the director, but I
20 don't know how that came about or what conversations
21 were had.

22 Q. Did you know that Mr. Baldoni would also star
23 as the lead character Ryle?

24 A. I -- I don't know if I knew that at the time.

25 Q. When did you learn that?

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1 A. That was never a worry of mine. I would have
2 been fine if they went with an unknown, if she could do
3 the job.

4 Q. It didn't hurt to have Blake Lively, right?

5 A. It didn't hurt.

6 Q. Now, you mentioned earlier that you had hoped
7 to be involved in writing the script.

8 At some point, did you learn that a script
9 had been written?

10 A. Yeah.

11 Q. When did you learn?

12 A. That it had been written?

13 Q. Yes.

14 A. I don't recall.

15 Q. And were you involved in the writing of the
16 original script?

17 A. I -- I actually had talked to Justin about
18 writing it myself, and once -- and he agreed to that,
19 but once I started, I realized I was not the person for
20 the job. I had a lot on my plate at the time, and he
21 had mentioned that scriptwriting with him -- like, he
22 liked to be involved as the script was being written,
23 and that's just not a way I can work, and so I told him
24 I no longer wanted to write it.

25 Q. Did you hope to have input, though, in the

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1 script?

2 A. Yes.

3 Q. And when did you -- did you have input into the
4 script at some point?

5 A. I requested to read the script several times,
6 and Justin repeatedly told me he wasn't -- it wasn't
7 where he wanted it yet for me to read it, and so I -- I
8 was not involved in the script as it was being written.
9 I was involved after it became a draft he was happy with
10 and, not with writing but with feedback.

11 Q. Feedback?

12 A. Yeah.

13 Q. You said "yeah" there. I'm just going to ask
14 you: Is that a "yes"?

15 A. Yes.

16 Q. Was there a meeting that you attended in which
17 the script was discussed?

18 A. Yes.

19 Q. What -- when was that meeting?

20 A. I don't -- I don't recall. I believe it
21 was -- I -- I don't even remember the year if I'm going
22 to be honest.

23 Q. Okay. I'm going to hand you a document that we
24 marked -- we have marked as Exhibit 5.

25 A. Okay.

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1 (Exhibit 5 was marked for identification.)

2 BY MS. HUDSON:

3 Q. Exhibit 5 is an email chain. At the bottom,
4 it's from Colleen Hoover, Samantha Emmer, cc'ing Andrew
5 Calof and Justin Baldoni, dated July 14th, 2022, with a
6 forward from Mr. Baldoni to Jennifer Abel, Matthew
7 Mitchell, and Jamey Heath on August 15th, 2024. It's
8 Bates-stamped Heath 4821 through 22.

9 Mrs. Hoover, you're not on the top of this
10 text chain, the forward, but you sent the one on the
11 bottom; is that correct?

12 A. Yes.

13 Q. And you recognize this as an email that you
14 sent and participated in?

15 A. Yes.

16 Q. And it looks like, at this time, July 2022, you
17 may have been to a visit. You were -- it looks like you
18 were getting on a plane.

19 Is this when the meeting took place?

20 A. Yes.

21 Q. Okay. So what happened at -- who was at that
22 meeting?

23 A. So Justin had held a contest for readers to
24 read the script and attend his offices, and that was
25 what the meeting was. Everyone read the script, and

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1 then they had a discussion with the readers who had been
2 selected about -- and they just kind of asked some
3 questions about the script and because they were still
4 in the process of writing it and wanted to see what
5 readers thought of it at that stage.

6 Q. And how did you feel about your role in that
7 script meeting?

8 MS. ZELDIN: Objection.

9 THE WITNESS: I was --

10 BY MS. HUDSON:

11 Q. Let me -- let me start -- let me ask you a
12 preliminary question: What was your role in that script
13 reading?

14 MS. ZELDIN: Objection.

15 THE WITNESS: My role, I -- I thought would
16 be to go into -- and be a part of the discussion, but
17 Justin had asked me not to speak during the script
18 meeting.

19 BY MS. HUDSON:

20 Q. Did he tell you why?

21 A. I -- I think it was because he didn't want me
22 to ask questions that could influence readers'
23 questions, but that was the first week I had access to
24 the script as well.

25 Q. Did you have thoughts that you wanted to share?

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1 A. Yes.

2 Q. Did you have thoughts that you would have liked
3 to have shared at that meeting if you could have?

4 A. Yes.

5 Q. And when you wrote this email with these notes,
6 was this your attempt to share the thoughts that you
7 couldn't share at the meeting?

8 A. Well, I -- I asked him how I could get my
9 thoughts to him, and he said that they were on a time
10 crunch, and that if I had thoughts, to send them that
11 day. And so after the script meeting, I went back to my
12 hotel before my flight and wrote these thoughts, but it
13 was based on what I had read during the meeting that
14 day.

15 He had given me the script a few days
16 before this, but it was during Book Bonanza, which is
17 the busiest weekend of the year, and I didn't have a
18 free second to really write down thoughts or read it.

19 Q. Were you satisfied with the input that
20 Mr. Baldoni was taking from you at the time?

21 MS. ZELDIN: Objection.

22 THE WITNESS: It was early -- it was early
23 on, so I -- I can say that I wasn't satisfied that I
24 wasn't given the script as it was being polished or made
25 to his liking. He -- he would not send it to me. I

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1 thought that it'd be nice to have earlier input as it
2 was being written.

3 | BY MS. HUDSON:

4 Q. Did you ever share with Mr. Baldoni your
5 thoughts on how intimacy should be portrayed in the
6 film?

7 A. I don't recall.

8 MS. HUDSON: I'm going to hand you
9 Exhibit 6.

10 (Exhibit 6 was marked for identification.)

11 MS. ZELDIN: Thank you.

12 BY MS. HUDSON:

13 Q. Okay. Exhibit 6 is a text chain between Jamey
14 Heath, Ange Giannetti, Justin Baldoni, and Alex Saks.
15 Ms. -- it's Bates-stamped HEATH_51557 through 558, dated
16 April 30th, 2023.

17 Mrs. Hoover, you are not on this text
18 chain, correct?

19 A. Yes.

20 Q. So in the first text in this chain, Mr. Baldoni
21 forwards something that he purports is from you.

22 Do you see that?

23 A. Yes.

24 Q. It says "from Colleen"?

25 A. Uh-huh.

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1 Q. Take a moment and read that. I just want to
2 know if this -- if you recognize this as something that
3 you wrote to Mr. Baldoni.

4 A. I just read it, and it is something I wrote and
5 sent to him.

6 Q. Okay. And at the bottom paragraph of this, you
7 write: It's fun sitting alone and reading detailed sex
8 scenes to some people, but not many want to be in a
9 theater watching them. In movies, it's way more
10 important we see those angsty looks and forbidden small
11 touches, flirtation, than an extended sex scene. Fade
12 to black is always nice in movies. Some of these movies
13 that focus on romance think women want to watch sex, but
14 they couldn't be more wrong. We want to watch love and
15 emotions and angst and buildup, and then using our
16 imagination from there is fine.

17 Are those words that you wrote?

18 A. Yes.

19 Q. And is that an accurate description of how you
20 felt intimacy should be portrayed in this film?

21 A. Yes.

22 Q. And why did you think that this was an
23 important way to portray intimacy in this film in
24 particular?

25 MS. ZELDIN: Objection.

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1 THE WITNESS: I didn't want -- as I stated
2 earlier, I didn't want this film to be portrayed as, you
3 know -- with lots of sex scenes. I wanted the focus to
4 remain on the heart of the book, which was Lily and her
5 bravery and her leaving an abusive situation.

6 BY MS. HUDSON:

7 Q. Okay. At some point the film began shooting,
8 right?

9 A. Yes.

10 Q. Were you involved in the actual shooting of the
11 film?

12 A. No.

13 Q. Did you visit the set?

14 A. Yes.

15 Q. When did you visit the set?

16 A. Was it being filmed in 2023?

17 Q. So do you recall that there were two periods of
18 time in which the film was shot?

19 A. Yes.

20 Q. Interrupted by a writers' strike?

21 A. Yes.

22 Q. So the first set -- the first phase of filming,
23 we'll call it, does May 2023 sound like the right time
24 to you?

25 A. Yes.

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1 Q. And were you visiting at that time?

2 A. Yes.

3 Q. And where was the preproduction office located?

4 A. I believe it was in New Jersey.

5 Q. How many times did you visit the preproduction
6 office in New Jersey?

7 A. Just -- just that one time.

8 Q. How long were you there?

9 A. Maybe an hour.

10 Q. Were you in town for something else?

11 A. Yes.

12 Q. And can you describe your meeting with
13 Mrs. Lively?

14 A. I was just introduced to her. It was very
15 brief.

16 Q. What was your initial impression?

17 A. I thought she was --

18 MS. ZELDIN: Objection.

19 THE WITNESS: -- very kind, and it was a
20 good meeting.

21 BY MS. HUDSON:

22 Q. I'm sorry. I didn't hear that.

23 A. I thought she was very kind, and it was a good
24 meeting.

25 MS. HUDSON: Okay. I want to focus a

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1 selected and felt -- but in a way that, because she was
2 honored to be there.

3 BY MS. HUDSON:

4 Q. Did you take that as complimentary to you,
5 having created her character?

6 A. Her -- her -- not -- not really. I think, as
7 an actress, it was just compliment -- like,
8 complimentary to whoever casted her.

9 Q. Okay. The -- the -- you said you were not on
10 set during the second phase of filming.

11 A. Right. I was -- I was invited; I did not go.

12 Q. And why did you not go?

13 A. I don't recall.

14 Q. When was the next time that you interacted with
15 Mr. Baldoni in person?

16 A. That was --

17 MS. ZELDIN: Objection.

18 THE WITNESS: -- the day of the trailer
19 screening in LA.

20 BY MS. HUDSON:

21 Q. What day was that?

22 A. I can't remember.

23 Q. Was it May 6th?

24 A. Of 2024?

25 Q. Yes.

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1 A. Possibly. I -- I don't know.

2 Q. And did you have a dinner with Mr. Baldoni that
3 day?

4 A. Yes.

5 Q. Who else was present at the dinner?

6 A. Jamey Heath and Tarryn Fisher.

7 Q. Who is Tarryn Fisher?

8 A. My best friend.

9 Q. Did Ms. Fisher come with you to the trailer
10 screening?

11 A. Yes.

12 Q. And can you describe the trailer screening?
13 What was it?

14 A. They had invited influencers and readers to
15 come and watch the -- the trailer early, before it
16 released to the public. And there were -- I wouldn't
17 call it a -- yeah, there was an event afterward where we
18 interacted with people. Justin and I sat behind a
19 makeshift flower booth and made bouquets of flowers, and
20 then I also did my EPK that day.

21 Q. And what is an EPK?

22 A. When you record promo for the movie.

23 Q. And the promo that you recorded for the movie,
24 was there some sort of prewritten script for you?

25 A. Yes. It was mostly all done on a teleprompter.

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1 MS. HUDSON: Mrs. Hoover, I'm going to hand
2 you a document that we'll mark as Exhibit 7 -- oh, 8.
3 I'm always one off.

4 (Exhibit 8 was marked for identification.)

5 BY MS. HUDSON:

6 Q. You had mentioned a dinner that you went to
7 with Tarryn Fisher, Jamey Heath, and Justin Baldoni that
8 you thought might have been May 6th, right?

9 A. Uh-huh.

10 Q. Does this document refresh your recollection
11 that it was, in fact, May 6th?

12 A. Yes.

13 Q. Okay. And this is a text chain between Jamey
14 Heath, Justin Baldoni, and Colleen Hoover, dated
15 May 6th, 2024, Bates-stamped BALDONI_33449.

16 And do you recognize this text chain?

17 A. Yes.

18 Q. And did you participate in it?

19 A. Yes.

20 Q. Okay. What was the purpose of this dinner?

21 A. I don't recall. We had just never had a meal
22 together before, and we were together all day doing PR.
23 But I think it was mostly because, you know, this movie
24 was halfway through being made, and we didn't really
25 interact a lot in person. And so since I was in LA, we

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1 just all decided to have dinner.

2 Q. And up to that point, did you feel that you had
3 been able to give the creative input that you had wanted
4 to give into the film?

5 MS. ZELDIN: Objection.

6 THE WITNESS: I -- I feel like -- no.

7 BY MS. HUDSON:

8 Q. And what is it that you wanted to do that you
9 felt you hadn't been able to do at that point?

10 A. I --

11 MS. ZELDIN: Objection.

12 THE WITNESS: I felt like I wanted to be
13 more involved in just the sense of knowing what was
14 going on with filming. And I was not receiving dailies.
15 And as an executive producer, I found that confusing,
16 and I ended up having to go to Sony to ask for dailies.
17 You know, just because without knowing what was going on
18 or seeing what was being filmed every day, I didn't feel
19 like I -- I could give input because I was just unaware
20 of what was happening.

21 BY MS. HUDSON:

22 Q. And what is a daily?

23 A. A daily is what's being -- what was filmed that
24 day. They kind of condense it to what scenes they're
25 going to use and send it to all the producers and

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1 whoever else is on the daily list.

2 Q. And you mentioned you were an executive
3 producer on the film?

4 A. Uh-huh.

5 Q. Is that a "yes"?

6 A. Yes.

7 Q. And what were the duties of an executive
8 producer, to your understanding?

9 A. I think it depends on -- on who it is. I
10 didn't really have duties per se. Executive producer, I
11 was told, was more just like a title they give people.
12 The producers who are the ones who do the actual work.

13 Q. But you felt in an executive producer role, in
14 order to contribute creatively as you had expressed, you
15 needed to see the dailies?

16 MS. ZELDIN: Objection.

17 THE WITNESS: Yes. And being the author of
18 the book. I received all the dailies on the project I
19 had done before this, and there were other things that
20 were being filmed that I was getting dailies on that
21 was -- were not this movie.

22 BY MS. HUDSON:

23 Q. Who did you first ask to see the dailies?

24 A. Justin. Maybe Jamey. I don't remember. But
25 they were really my point of contact.

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1 Q. And when did you first ask them to see the
2 dailies?

3 A. When the film started filming.

4 Q. So back in May of 2023?

5 A. Uh-huh.

6 Q. So now -- is that a "yes"?

7 A. Yes. Sorry.

8 Q. That's all right.

9 So now we're in May of 2024. So in that
10 year, you had not received dailies?

11 A. Yes, I started receiving dailies because I
12 asked Ange Giannetti to -- if I could get them. And she
13 was shocked I wasn't getting them, so she started making
14 sure I was on the list.

15 Q. And when was that?

16 A. Probably June or July of filming.

17 | Page of 2023?

18 A. Uh-huh.

19 Q. Is that a "yes"?

A. It was the year before this -- so, yes, 2023.

21 Q. And who was Ange Giannetti?

22 A. She worked for Sony.

23 Q. Did you understand her to be the executive in
24 charge of the production for Sony?

25 A. She was the one on set while I was there, so

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1 THE WITNESS: At that time, I didn't know,
2 because I hadn't seen the final edit.

3 BY MS. HUDSON:

4 Q. So to understand how it was working -- you
5 received dailies; you periodically gave creative input;
6 you did not know whether that input was incorporated
7 into the film, one way or the other?

8 A. Right.

9 Q. Did you find Mr. Baldoni to be collaborative
10 with you up to this time period of this dinner on
11 May 6th?

12 MS. ZELDIN: Objection.

13 THE WITNESS: I did. I felt at the time
14 that when I would give thoughts, which wasn't very
15 often, he was receptive. But I -- I don't know that I
16 knew if they were being taken into consideration.

17 BY MS. HUDSON:

18 Q. Going to this dinner on May 6th, what
19 was -- how long did the dinner last?

20 A. I believe we were there for a couple of hours.

21 Q. And generally, what was discussed at the
22 dinner?

23 A. The edit and Blake. Do I need to go into more
24 detail --

25 Q. I will ask for more detail --

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1 was?

2 A. I don't.

3 Q. Okay. So going back to the dinner on May 6th,
4 what do you recall, to the best of your memory? Who
5 said what about the edit then?

6 A. About the edit, about Blake getting her own
7 cut, I believe Justin was the one who told me that it's
8 possible the movie could change from what I saw because
9 Blake was getting an edit and was going to have a test
10 screening in what they call a bake-off, which is where
11 they see which one tests better.

12 Q. Did Mr. Baldoni explain to you why it was the
13 case that there would be a bake-off, or his view, at
14 least?

15 A. Yeah, he said that -- I'm trying to remember.
16 I don't know that it -- it was -- pertained to the
17 bake-off. I know that he said that Blake was demanding
18 her own edit and that Sony was allowing her the
19 opportunity to edit the film because she was unhappy
20 with his cut.

21 Q. Did he tell you what Mrs. Lively was unhappy
22 with in his cut?

23 A. He insinuated that it was more -- or his
24 opinion was that she wanted to take over the film.

25 Q. Is that how he described it?

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1 A. Uh-huh.

2 Q. Is that a "yes"?

3 A. Yes.

4 Q. Did he say anything else in that regard?

5 A. You'd have to be more specific.

6 Q. Did he tell you why she thought Mrs. Lively
7 wanted to, quote, Take over the film, end quote?

8 A. Yes. At this dinner, he informed me that this
9 had been an ongoing issue, which in -- him that -- I
10 believe the exact words they used were: We're not
11 saying she's a narcissist, but she's exhibiting
12 narcissistic behavior, and that she was making their
13 lives very stressful during the filming, and it was not
14 a good experience. And I remember being shocked because
15 I had heard none of this before the dinner, and this was
16 well after filming had resumed. I had already seen the
17 film at this point.

18 Q. And did they give you specific examples of what
19 Mrs. Lively was doing, in their view, that was upsetting
20 to them, either Mr. Baldoni or Mr. Heath?

21 A. Yeah. They explained to me that she had a
22 meeting that blindsided them about their behavior and
23 that it was at her house and that she forced them to
24 sign a document stating they wouldn't exhibit that
25 behavior anymore or she wouldn't resume filming.

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1 Q. And who -- who between the two of them shared
2 this with you, Mr. Baldoni or Mr. Heath?

3 A. It was both of them.

4 Q. So they -- were they talking at the same time?

5 A. Kind of bouncing back and forth off of each
6 other.

7 Q. Did either Mr. Baldoni or Mr. Heath describe to
8 you the specific behavior that was in this document?

9 A. They did.

10 Q. What -- what did -- what did they say? And if
11 you can, to your recollection, tell me which one of them
12 said what. And if you can't recall, that's fine, but if
13 you can recall with specificity who said what, please
14 tell me.

15 A. I know -- I know Justin said that Blake
16 had -- had put in the document that she wants him to
17 stop speaking to her dead father, and I asked him to
18 elaborate on that, and he said that some time -- that he
19 told her that he sometimes speaks to her father.

20 Q. Who's dead?

21 A. Yes.

22 Q. Did you have any thoughts on that?

23 MS. ZELDIN: Objection.

24 THE WITNESS: I -- I was a little confused.
25 I didn't know what he meant by that. I didn't know if

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1 he meant he prayed to her dead father or just, like, if
2 it's part of his spiritual or religious practice, but he
3 did say that -- that he said it, but that it bothered
4 her. Another thing was something about saging interns,
5 and that she had asked that he no longer sage her
6 interns, I believe.

7 BY MS. HUDSON:

8 Q. Saging, do you mean, like, with the herb sage?

9 A. Uh-huh.

10 Q. Is that lighting it on fire?

11 A. I didn't ask what --

12 Q. Okay.

13 A. -- that meant. There was another incident
14 where Jamey said she said that they need to stop going
15 into her trailer while she's breastfeeding, and he then
16 went on to explain to me what happened with him going
17 into her trailer. This was Jamey, not Justin. He said
18 that he went into her trailer invited because they had
19 to go over -- they had no discuss something, and I'm not
20 sure what they were discussing, but that he had agreed
21 to -- to turn and face the wall, but that, at some
22 point, during this conversation, he -- he turned around
23 to say something to her and that she was going to file
24 sexual harassment or that he feared she would file
25 sexual harassment claims against him, but he was -- he

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1 was telling me this because it was all in this document
2 that apparently was -- was going to come out, and so
3 they were just trying to prepare me for what -- what was
4 in the document.

5 I believe those are the only few things I
6 recall them telling me that night.

7 BY MS. HUDSON:

8 Q. Did Mr. Bal- -- Mr. Heath tell you that he had
9 seen Ms. -- that he had looked at Mrs. Lively when she
10 was in a state of undress from the waist up?

11 MS. ZELDIN: Objection.

12 THE WITNESS: He did not explain how she
13 was dressed or anything.

14 BY MS. HUDSON:

15 Q. Is there anything else you recall Mr. Baldoni
16 or Mr. Heath telling you about the document that they
17 signed?

18 A. I -- I know they were telling me that they felt
19 like if they didn't sign it, then the movie wouldn't
20 happen, and that's why they signed it. But the few
21 things that they did tell me -- they said that they did,
22 like the saging and the praying to her -- or talking to
23 her dead father. So I wasn't, at the time, aware of
24 what all was in the document.

25 But that's all I can really recall

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1 Q. Did you have any concerns after the dinner?

2 MS. ZELDIN: Objection.

3 THE WITNESS: I think I was just
4 disappointed.

5 BY MS. HUDSON:

6 Q. And why was that?

7 A. I didn't know Justin and Jamey all that well,
8 but I know that, you know -- I -- I just thought that
9 everything with filming had gone well, and I was
10 concerned that, now, there seemed to be, like, a battle
11 over the edit about to occur, and that concerned me.
12 And I was just disappointed that all this was happening.

13 Q. Were you concerned that Mr. Heath felt like
14 Mrs. Lively was going to make sexual harassment
15 allegations?

16 MS. ZELDIN: Objection.

17 THE WITNESS: No, I -- I didn't know that
18 was happening.

19 BY MS. HUDSON:

20 Q. Well, you said that he said that he was worried
21 that she was going to claim sexual harassment, right?

22 MS. ZELDIN: Objection.

23 THE WITNESS: Well, for -- from when he was
24 speaking about the incident, I think he -- I don't
25 remember the exact words, but I remember them just

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1 concerned that -- that that incident was going to turn
2 into some sort of claim or be released publicly.
3 They -- they were worried about this document.

4 BY MS. HUDSON:

5 Q. They were worried that it would be released
6 publicly?

7 A. Yeah, I believe -- I believe so. I -- I don't
8 recall if that was, you know, spoken, but it was
9 definitely implied that they did not like that this
10 document was -- existed.

11 MS. ZELDIN: Move to strike.

12 Nonresponsive.

13 BY MS. HUDSON:

14 Q. And what did Mr. Baldoni or Mr. Heath say
15 specifically to lead you to conclude -- to the
16 conclusion that they did not like that this document
17 existed?

18 A. I -- I can't recall the exact wording. It was
19 just the entire conversation at dinner. They were very
20 much disappointed that -- that they didn't -- or Blake
21 didn't get along with them or they didn't get along with
22 Blake and that -- that they had to have this meeting and
23 that they felt blindsided because they didn't know that
24 she had concerns with their behavior at the time.

25 Q. Did you ever come to learn that Mrs. Lively had

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1 previously told Mr. Baldoni and Mr. Heath about her
2 concerns before --

3 A. No.

4 Q. -- the meeting?

5 A. I had no -- before this dinner?

6 Q. Before the meeting they're describing, which
7 they said they were blindsided?

8 MS. ZELDIN: Objection.

9 THE WITNESS: No. I had just become aware
10 that any of this was happening.

11 BY MS. HUDSON:

12 Q. Did you have any concerns about the way that
13 they were speaking about Mrs. Lively following this
14 dinner?

15 MS. ZELDIN: Objection.

16 THE WITNESS: I don't know that it was a
17 concern rather than just disappointment. Like, I did
18 feel like for -- for a man who has a platform of
19 building women up, that I left the dinner disappointed
20 that it felt like I was made to not like her. Like --
21 like, I left the dinner feeling like the intention was
22 to get me on their side or, you know, just explain their
23 side before I heard it from her.

24 BY MS. HUDSON:

25 Q. And is that the kind of thing you would have

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1 expected from Mr. Baldoni based on what he had told you
2 about his views early on when you optioned the book?

3 MS. ZELDIN: Objection.

4 THE WITNESS: No, not at all.

5 BY MS. HUDSON:

6 Q. And why is that?

7 MS. ZELDIN: Objection.

8 THE WITNESS: I -- I think I was just a
9 little blindsided by the dinner and everything I was
10 told, and the -- the way they were kind of forewarning
11 me about what kind of person she was.

12 BY MS. HUDSON:

13 Q. And did you have any reason to believe the
14 portrayal that Mr. Baldoni and Mr. Heath were making of
15 Mrs. Lively up until that point, based on your
16 experience?

17 MS. ZELDIN: Objection.

18 THE WITNESS: No.

19 BY MS. HUDSON:

20 Q. Did you -- do you recall anything that you or
21 Ms. Fisher said during this dinner?

22 A. I don't. I think we were just asking
23 questions. Like, I remember I was very concerned about
24 the film at that point, and I was asking him questions
25 about: Well, what does this a mean for the film? Is

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1 and -- and I said that that didn't go how I thought it
2 would, and she said: Me neither. And we discussed our
3 surprise that they -- that they didn't get along and
4 that all of this was happening. Like, this was the
5 first I had found out about any of it.

6 Q. So this dinner was May 6th. Did it change your
7 views of Mr. Baldoni or Mr. Heath at that time?

8 A. It did.

9 Q. In what way?

10 A. I felt like if -- if they could speak of Blake
11 how they -- how they did, it made me more cautious with
12 them.

13 Q. And what do you mean by that?

14 A. I just didn't really want to interact with them
15 anymore. I think after that dinner, I -- I texted with
16 Justin and Jamey a handful of times and never spoke to
17 them again.

18 Q. Did your views of Mrs. Lively change after that
19 dinner?

20 A. No, I -- I didn't know her. I didn't know if
21 the views -- or the things they told me were accurate.
22 I just kind of wanted to distance myself from all of it.

23 Q. At some point, did you reach out to
24 Mrs. Lively?

25 A. I did.

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1 Q. I'm going to hand you a document to be marked
2 as Exhibit 10 -- 9. I'm sorry, 9.

3 (Exhibit 9 was marked for identification.)

4 BY MS. HUDSON:

5 Q. Exhibit 9 is an email chain between Blake
6 Lively and Colleen Hoover dated May 15th, 2024,
7 Bates-stamped BL-27030 through 33.

10 A. Yes.

11 Q. And the first email in the chain is from you on
12 May 15th at 7:11 a.m.

13 Do you see that?

14 A. Yes.

15 Q. And above that, Mrs. Lively responds to your
16 email, and she says: May I have your number?

17 Do you see that?

18 A. Yes.

19 Q. So as of this date, you did not have -- you and
20 Mrs. Lively had not had a phone call --

21 A. Right.

22 Q. -- together?

23 A. Never.

24 Q. You didn't have each other's phone numbers?

25 A. I didn't have her email.

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1 Q. You didn't have her email?

2 A. Yeah.

3 Q. How did you get this email to her?

4 A. I have a production partner because I started a
5 production company around this time, and I was -- I was
6 concerned about what Blake getting a cut meant, and so I
7 spoke to her about it, and she recommended that I send
8 the notes that I had given to Justin to Blake because
9 she said you don't know which one's going to end up
10 being what your readers see, so you want both of them to
11 have your notes.

12 And so her -- her -- our agent, film agent,
13 somehow got me Blake's email, and I sent this email to
14 Blake. Just -- I wanted to give her the same notes that
15 I gave Justin, as my priority was, you know, I -- I
16 wanted the best movie for the readers, and I was
17 concerned, based on the tension between the -- Justin
18 and Blake, that Justin would not give Blake my notes, so
19 I -- I sent them.

20 Q. You felt like you needed to send your notes
21 directly to Mrs. Lively?

22 A. Yes.

23 Q. And are these the same notes that you gave
24 Mr. Baldoni?

25 A. Yes.

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1 Q. And in your email, you said that you wanted to
2 get the notes in the right hands. What did you mean by
3 that?

4 A. To -- to Blake, in the right -- can I read
5 that --

6 Q. Sure.

7 A. -- for context?

8 Q. Yes.

9 A. (Witness examines document.)

10 Q. It's the end of the first paragraph. You said:
11 I also sent these to Justin a while back, and some may
12 have been addressed already, but I have zero experience
13 with moviemaking and wanted to make sure they are in the
14 right hands.

15 A. I think -- I think I just meant if Blake was
16 getting a cut, I wanted to send them directly to her
17 instead of, like, relying on Justin to send them to her.

18 Q. Okay. And Mrs. Lively asked for your number.
19 Did you give her your number?

20 A. I did.

21 Q. Did you have a telephone call with her
22 following this email?

23 A. I did.

24 Q. And what -- was it just you and her?

25 A. Yes.

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1 Q. Was it on May 15th?

2 A. It was the morning I sent her my number, so if
3 that's what the email is, then yes.

4 Q. Do you recall what you discussed?

5 A. Yes. She had read my notes and was discussing
6 some of the notes with me and said that she agreed with
7 me on a lot of them and wanted me to come watch her
8 edit.

9 Q. So she invited you into the edit room?

10 A. No. She was having a screening. Sorry. She
11 wanted me to come to New York and watch her screening so
12 that I -- I could see what she had done.

13 Q. Okay. I'm going to hand you what we'll mark as
14 Exhibit 10.

15 (Exhibit 10 was marked for identification.)

16 BY MS. HUDSON:

17 Q. Exhibit 10 is an email chain between
18 Mrs. Hoover and Blake Lively dated May 15th, 2024,
19 Bates-stamped BL-27039 through 43 -- 43.

20 Do you recognize this as the continuation
21 of the prior email chain that we looked at in Exhibit 9?

22 A. Yes.

23 Q. And you participated in this email exchange?

24 A. Yes.

25 Q. So in this email exchange, you see you gave her

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1 your phone number?

2 A. Uh-huh.

3 Q. On -- at 6:50 a.m.?

4 A. Yes.

5 Q. And then Ms. -- you said she invited you to the
6 screening. Was that during the phone call?

7 A. Yes.

8 Q. Okay. And you tell her in response here that
9 you would love to go to the screening?

10 A. Yes.

11 Q. And did you, in fact, go to the screening?

12 A. Yes.

13 Q. And what was your impression of the film after
14 you saw Ms. -- the cut that Mrs. Lively was working on
15 with Sony?

16 A. I liked her cut also and also had more notes.
17 So as soon as the film ended I went into a room at the
18 theater and jotted down everything I could think to give
19 her, because I didn't know if I would have the
20 opportunity after that to give notes. But I liked both
21 cuts.

22 | (Exhibit 11 was marked for identification.)

23 BY MS. HUDSON:

24 Q. I'm going to hand you what we marked as
25 Exhibit 11.

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1 Q. And did you -- do you recall if you spoke to
2 Mr. Greenstein after this introduction?

3 A. I -- I honestly don't recall.

4 Q. All right. So you saw the film on the 19th.
5 You were thanking Mrs. Lively.

6 Did you think about the cut of the film
7 that she had screened at all after that initial viewing?

8 A. Yeah. Yes.

9 Q. And did you share your thoughts with her?

10 A. Yes. I wrote a lot of them down at the
11 screening and gave them to her, and then we continued to
12 discuss the thoughts over text and phone calls.

13 (Exhibit 13 was marked for identification.)

14 BY MS. HUDSON:

15 Q. Okay. I'm going to hand you Exhibit 13.

16 Exhibit 13 is a text chain between Colleen
17 Hoover and Blake Lively, dated May 19th, '24, through
18 May 20, '24, Bates-stamped BL-39197 through 201.

19 Do you recognize this as a text chain that
20 you participated in with Mrs. Lively, Ms. Hoover?

21 A. Yes.

22 Q. So if you go down to the bottom of this chain,
23 it says, from you at 9:37 p.m. -- I'm sorry at
24 11:14 p.m.: I loved Josh so much. We're chatting again
25 tomorrow, but I feel like he's a good one. Thanks for

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1 putting me in touch with him.

2 So by this point, had you already had a
3 conversation with Mr. Greenstein?

4 A. Yeah, it does look that way.

5 Q. Do you -- but sitting here today, do you recall
6 that conversation?

7 A. I don't.

8 Q. Okay. And then the next entry you say --
9 actually, why don't you read that one out loud, at
10 4:50 a.m.?

11 A. Blake, oh, my gosh, Josh gave me a password to
12 watch again because he wants me to get you my thoughts
13 ASAP. So I watched Justin's latest and yours side by
14 side. I have a list of 57 things I loved about yours
15 more. You killed it. It's so hard in the theater to
16 focus when you're nervous and people are talking. But
17 seeing all the improvements you made solidified and
18 already saw a decision. I'm going to bed but will send
19 you thoughts ASAP in the morning. I really believe in
20 this adaptation and think with this week's edits that
21 you're doing it's going to be life-changing. My God,
22 thank you. I'm sorry this is a day late. I know I told
23 you it was great already, but I can't wait to type up
24 all the whys and get them to you tomorrow.

25 Q. Did this accurately describe how you felt at

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1 the time?

2 A. Yes.

3 Q. And what was it that you saw when you had the
4 opportunity to look at the cuts side by side that you
5 liked more in Mrs. Lively's?

6 A. I definitely thought hers had more humor in it.
7 That was very important to me. I remember there were a
8 couple of scenes with the character Atlas that bothered
9 me in the first cut I saw, that were removed from
10 Blake's cut. I can't recall exactly all of the things
11 that I liked more about her cut, but I -- I did feel
12 like my concerns in the initial notes I sent her, a lot
13 of them had already been addressed.

14 Q. So are you saying you think she may have made
15 some changes between May 15th and when you saw
16 the -- the --

17 A. Not based on my notes.

18 Q. I see.

19 A. I think just that we had similar intuition
20 about some of the scenes.

21 Q. So just to make sure I understand what you're
22 saying, you -- between the time you gave notes on
23 May 15th and you saw the screening yourself alone, with
24 Justin's side by side, there had been some changes to
25 the cut that Blake was working on that you liked?

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1 BY MS. HUDSON:

2 Q. Did it seem strange to you that his name was on
3 there three times?

4 MS. ZELDIN: Objection.

5 THE WITNESS: Yeah. I think on the poster,
6 it was a little bit much.

7 BY MS. HUDSON:

8 Q. You mentioned that you shared your thought --
9 your detailed thoughts with Mr. Greenstein on the cut of
10 the film that Blake had shown you that you watched side
11 by side with Mr. Baldoni's cut?

12 A. Uh-huh. Yes.

13 (Exhibit 14 was marked for identification.)

14 BY MS. HUDSON:

15 Q. I'm going to hand you what we'll mark as
16 Exhibit 14. Exhibit 14 is an email between Mrs. Hoover
17 and Mr. Greenstein dated May 20th, 2024, Bates stamped
18 SPE_BL7880 through 88.

19 Mrs. Hoover, are these the notes that you
20 sent Mr. Greenstein regarding your thoughts on the cut
21 of the film that Blake had been working on at that
22 point?

23 A. Yes.

24 Q. And in the second sentence -- paragraph, you
25 say: I don't know Blake well enough at all, but I do

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1 think it's important she know all the things I loved
2 about her changes.

3 Would you describe this as a summary of the
4 things that you loved about the changes?

5 A. Yeah, and some additional notes that I thought
6 should be changed.

7 Q. And do you know if Mr. Greenstein shared these
8 notes with Mrs. Lively?

9 A. I believe I asked him -- I was sending them
10 through him to her, but then he said to send them
11 directly, if I'm not mistaken.

12 Q. And then did you do that?

13 A. Yes.

14 Q. And was Mrs. Lively receptive to receiving the
15 notes from you?

16 A. Yes.

17 MS. ZELDIN: Objection.

18 BY MS. HUDSON:

19 Q. And when you say "receptive," how -- what does
20 that mean to you?

21 A. Acknowledging that she received the notes and
22 would consider them.

23 (Exhibit 15 was marked for identification.)

24 MS. HUDSON: I'm going to hand you a
25 document that we've marked as Exhibit 15.

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1 And, Mr. Stinson, we sent a proposed
2 stipulation this morning. I don't know if you've had a
3 chance to see that about, the Bates stamping in the
4 production here. So I wanted to see if we could put
5 that on the record.

6 Our understanding is that the text messages
7 in Exhibit 14 that were -- 15 that were produced by
8 Mrs. Hoover are her communications with Josh Greenstein,
9 based on the way they were produced to us. Can you
10 confirm that for the record?

11 MR. STINSON: I can confirm that those
12 conversations were produced in a digital folder bearing
13 that label. I haven't had a chance to go back to
14 confirm. I can do that on a break or we can take a
15 break and I can do that. But I can tell you we produced
16 it in digital folders describing with whom she was
17 conversing.

18 MS. HUDSON: All right. Well, we might be
19 able to avoid that by asking Mrs. Hoover herself.
20 So --

21 BY MS. HUDSON:

22 Q. Mrs. Hoover, do you recognize this as text
23 communications between you and Mr. Greenstein in this
24 section Bates stamped Hoover 0090 through 98?

25 A. Yes.

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1 Q. -- I'm sorry. 99.

2 A. Yes.

3 Q. Okay. And you -- you -- how did you collect
4 these screen -- these text messages that were produced
5 to us in this case?

6 A. How did I, like, get them in this form?

7 Q. Yes.

8 A. They were on my phone.

9 Q. Did you screenshot them?

10 A. I don't -- I don't think I screenshotted them.
11 I think I downloaded the whole conversations that I had
12 had with him and then just sent the file to my lawyer.

13 Q. So this is the full conversation downloaded
14 from your phone that you had on text with
15 Mr. Greenstein?

16 A. Yes.

17 MS. ZELDIN: Objection.

18 You have to wait till I make my objection.
19 I'm sorry.

20 THE WITNESS: Oh, okay. I'm sorry.

21 BY MS. HUDSON:

22 Q. Is this the whole conversation downloaded from
23 your phone that you had with Mr. Greenstein?

24 A. Yes.

25 MS. ZELDIN: Objection.

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1 MS. HUDSON: Yeah. Counsel, can I ask the
2 basis of your objection?

3 MS. ZELDIN: I have no idea how this is
4 all -- this is all the conversations. I don't know how
5 she does either, but --

6 MS. HUDSON: Okay.

7 MS. ZELDIN: So it lacks foundation.

8 MS. HUDSON: Okay.

9 BY MS. HUDSON:

10 Q. Ms. -- Mrs. Hoover, you -- when you say it was
11 the full conversation, was this all of the texts that
12 existed in your phone that you were able to view between
13 you and Mr. Greenstein?

14 A. Yes. We didn't text that often, so I think
15 this is every conversation I had with him over text.

16 Q. Okay. Now -- okay.

17 You mentioned that you -- Mr. Greenstein
18 told you to just send the notes directly to Mrs. Lively?

19 A. Uh-huh.

20 Q. Is that a "yes"?

21 A. Yes.

22 Q. And is that what he's saying at the text that
23 begins at the end of 090, on May 20th at 2:14, and
24 continues on 091? At the top, it says: Got it. Just
25 read through. Send for sure. I think they are great.

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1 Smart.

2 MS. ZELDIN: I'm sorry. I think you
3 misspoke. You said 2:14; it's 2:41. Not that it
4 matters, but...

5 MS. HUDSON: You're correct. Thank you for
6 correcting the record.

7 BY MS. HUDSON:

8 Q. So I just want to confirm that the top of this
9 page 091 is Mr. Greenstein telling you to send the notes
10 to Mrs. Lively; is that right?

11 A. Yes.

12 Q. Okay. Okay. And then if you look down at the
13 next text, on May 23rd at 6:53 p.m., it looks like
14 you're texting Josh about plans for the next night.

15 What -- what did this relate to?

16 A. I don't recall.

17 Q. Okay. And then if you scroll down to May 31st,
18 092, at 2:57 a.m., you say: I'm busy from 9 to 11
19 tomorrow, if you want to chat after. But despite what
20 the numbers say and feedback say or don't say, I really
21 think we need to choose a cut and move forward. And as
22 it stands, I think Blake's is the stronger one to move
23 forward with. It just checked a lot more boxes for me,
24 and I strongly feel she can work it to be the best film
25 in edits so that we can ultimately get to the best film

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1 for the readers. I appreciate the work put into this by
2 everyone, but the back-and-forth at this point is going
3 to hurt this movie beyond measure. Let me know if
4 there's anything I can do to convey my feelings wherever
5 I need to convey them.

6 Was this accurately how you felt at this
7 time on May 31st, that Blake's was the stronger one to
8 move forward with and checked a lot more boxes for you?

9 A. It -- it was, yes.

10 Q. And at some point, did you begin discussing
11 Book Bonanza with Mr. Greenstein?

12 A. Yes.

13 Q. So what was your thought for Book Bonanza with
14 respect to the film?

15 A. I had approached them about a year earlier
16 hoping to show the film at Book Bonanza, but was told
17 no. That it was too -- I think that their reasoning was
18 that it was too far away from what was supposed to be
19 the release date or too -- honestly, I can't remember
20 why they said no.

21 But then, as Book Bonanza drew closer and
22 they realized that they were going to have a whole film
23 they could show, they changed their minds, and so we
24 began moving forward with plans to show the film at Book
25 Bonanza.

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1 one?

2 MS. HUDSON: You can just set it aside.

3 We'll probably pop back to that in a minute.

4 (Exhibit 16 was marked for identification.)

5 BY MS. HUDSON:

6 Q. Exhibit 16 is an email chain between Emily
7 VanDerwerken, Colleen Hoover, Danni Maggin, and Todd
8 Michalak regarding Book Bonanza schedule, Bates stamped
9 SPE_BL19747 through 750.

10 Is this an email chain that you
11 participated in, Mrs. Hoover?

12 A. Yes.

13 Q. And do you recognize this as the schedule for
14 Book Bonanza that was provided to you by Sony?

15 A. It wasn't the schedule for Book Bonanza; it was
16 the schedule for their part of Book Bonanza.

17 Q. So promotional things that Sony was doing in
18 connection with Book Bonanza?

19 A. Yeah, in connection with Book Bonanza and the
20 movie.

21 Q. Okay. So if you look at the schedule, it
22 starts Saturday, June 15th --

23 A. Yes.

24 Q. -- do you see that?

25 Is that when Book Bonanza began?

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1 A. Yeah -- well, it began on Thursday.

2 Q. Okay.

3 A. The 15th is when they were going to show the
4 movie.

5 Q. Okay. And was there going to be more than one
6 screening?

7 A. They rented out a whole theatre, and so it was
8 screened in every theater because we had to seat almost
9 3,000 people.

10 Q. And did it screen on only one night or more
11 than one night?

12 A. Just one night, all at the same time.

13 Q. Did you invite Mrs. Lively to Book Bonanza?

14 A. Yes.

15 Q. Did you invite anyone else from the cast?

16 A. I believe everyone.

17 Well, that's not true. I only invited
18 Justin initially, Blake, Brandon Sklenar, Isabela
19 Ferrer, and Alex, who played young Atlas. And I believe
20 I invited Jenny Slate.

21 Q. Uh-huh.

22 So all of the main characters?

23 A. Uh-huh.

24 Q. Is that a "yes"?

25 A. Yes.

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1 Q. And who actually went to Book Bonanza?

2 A. Blake Lively, Justin -- no, not Justin, Brandon
3 Sklenar, Isabela Ferrer.

4 Q. Why did Mr. Baldoni not go to Book Bonanza?

5 MS. ZELDIN: Objection.

6 THE WITNESS: I -- I believe because him
7 and Blake didn't get along, and so Sony or someone
8 decided which one of them would go. I'm not sure at
9 this point.

10 BY MS. HUDSON:

11 Q. Did anyone tell you why Mr. Baldoni did not go
12 to Book Bonanza?

13 I'm trying to understand if your answer is
14 speculation or you have some basis for making that
15 statement.

16 A. I just knew he wasn't coming, but I can't
17 remember why I knew that. I know that he and Blake
18 would not attend at the same time because at this point,
19 they -- they were -- they wouldn't be together in the
20 same location.

21 Q. Did Ms. --

22 MS. ZELDIN: Move to strike.

23 BY MS. HUDSON:

24 Q. Did Mrs. Lively ever tell you that she would
25 not go to Book Bonanza if Mr. Baldoni was there?

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1 Q. Would you say you were collaborating on the
2 edit by this point?

3 A. Not in an equal way, but, yeah -- yes.

4 Q. When you say "not in an equal way," what do you
5 mean by that?

6 A. I mean, I had never edited before; I had never
7 worked in film, so, you know, I'd give her my opinions,
8 but she was, more or less, the one who was doing all the
9 work with the editor and had all those interactions, and
10 I -- I just would tell her my thoughts and hope they
11 ended up listening to them.

12 Q. Did you spend time in the edit room with
13 Mrs. Lively?

14 A. I did.

15 Q. And did you meet the editors that she was
16 working on on the cut of the film for Sony?

17 MS. ZELDIN: Objection.

18 THE WITNESS: One of them was in the room
19 with us; one of them was over Zoom.

20 BY MS. HUDSON:

21 Q. And who was -- do you remember what their names
22 was?

23 A. Uh-huh. Travis -- I don't remember his last
24 name -- was in the room with us.

25 Q. Was it Moore?

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1 A. Yes. Loved him.

2 And, God, I'm -- Shane.

3 BY MS. HUDSON:

4 Q. Shane Reid --

5 A. Shane Reid.

6 Q. Okay.

7 A. Yeah. He was the one on Zoom.

8 Q. How many times would you say you were in the
9 edit room with Blake?

10 A. I believe I was there for five days, but I
11 could be wrong. I -- I don't remember counting.

12 Q. And when you were in the edit room with
13 Mrs. Lively, were the editors both there also?

14 A. Travis was there.

15 Q. And then --

16 A. Shane would mostly do stuff, like, that they
17 gave him notes on, and then he would work independently
18 because I believe he was in LA.

19 Q. And what was your contribution in the edit
20 room?

21 A. I sat with them and watched all the changes and
22 was giving my opinion, and I guess whatever --
23 I -- I -- yeah, that's all I can think that I did.

24 Q. I'm going to hand the reporter a document to be
25 marked as Exhibit 19.

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1 manipulation tactic?

2 A. I -- I felt like when Blake would change
3 something in her edit, they would then add -- add some
4 of those changes to try to get their edit a little
5 better or -- that's not the right term.

6 Q. Well, going back to your text, you say that you
7 think that he said he added those changes, but he really
8 didn't do it when you looked at the film.

9 A. Yeah, I felt -- I felt like he said he added
10 some of Blake's things, and sometimes he did, but in
11 this particular instance, I -- I must have not thought
12 that they were actually changed in the scene that I got.
13 But I also felt like I wasn't included in these emails
14 anymore, and so just the fact that it came to me, I felt
15 like was a little manipulative.

16 Q. I see.

17 So he -- Mr. Baldoni was not including you
18 in the edit process the way that Mrs. Lively was
19 including you in the edit process --

20 MS. ZELDIN: Objection.

21 BY MS. HUDSON:

22 Q. -- is that right?

23 A. Yes.

24 Q. Okay. Would you say that any differently than
25 I did?

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1 A. No.

2 Q. So when you got this email, you wondered why he
3 was sending it to you?

4 A. Right. Yes.

5 Q. Let's look at page 27120. In this section of
6 the text -- I'm sorry. We're going back to --

7 MS. ZELDIN: Okay. Thank you.

8 MS. HUDSON: -- Exhibit 20. Sorry about
9 that.

10 THE WITNESS: Okay.

11 BY MS. HUDSON:

12 Q. Going back to Exhibit 20, if you look at
13 page 27120, there's a discussion here about your sister
14 seeing the cut of the film that Mrs. Lively was working
15 on --

16 A. Yes.

17 Q. -- do you see that?

18 And you seem to be saying that she had very
19 strong feelings about it; is that right?

20 A. About the graphics, I believe.

21 Q. I see. Okay.

22 And then it's -- it looks like there was
23 some change, and your sister liked the changes; is that
24 right?

25 A. Yes.

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1 A. Yes.

2 Q. And dinner, is that the May 6th dinner --

3 A. Yes.

4 Q. -- that we talked about? Okay. All right.

5 And why was that dinner making you angrier
6 every time you thought of it?

7 A. I think because of -- of the way they spoke
8 about Blake, and I -- I feel like I went into the dinner
9 thinking that we were just going to have dinner, that it
10 was a chance for us to get to know each other better.
11 And instead, I ended up feeling like we only went to
12 dinner so that they could tell me their opinions of
13 Blake before I heard about what was happening. And I
14 felt like if I cut off communication with them, then
15 they wouldn't have the opportunity to have those
16 conversations with me again.

17 Q. And Mrs. Lively, at 11:10 p.m. tells you: Next
18 time we talk I want to hear it, because I find myself
19 feeling guilty for pushing back so hard on them to make
20 the best movie. And I haven't shared with anyone my
21 experiences with them until someone first comes to me
22 horrified by their own experiences, and even then, I
23 don't get into all of this.

24 Was that your experience with her, that she
25 wasn't sharing all the details of what she experienced

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1 can't remember each point.

2 Q. Mrs. Lively goes on to say in this text: Yet
3 somehow I hold those guys' narrative in my gut. And it
4 hurts to be so misrepresented after being so viciously
5 mistreated.

6 Do you know what she meant by "those guys'
7 narrative"?

8 A. Yeah, I believe it was probably the narrative
9 they had about her at the dinner with me. That's how
10 I -- that's how I interpret this.

11 Q. And then Mrs. Lively says: And all I'm fighting
12 for is the work. That's all I've ever fought for is the
13 work, and in that, a safe set to do the work in. That's
14 it, from day one to today.

15 Did you have any reason to doubt that
16 Mrs. Lively was genuine in what she was telling you
17 there?

18 MS. ZELDIN: Objection.

19 THE WITNESS: No.

20 BY MS. HUDSON:

21 Q. And then you go on to describe a little bit
22 more, it looks like, this dinner, on May 6th at
23 11:33 p.m., and you say: Yeah, honestly, the narrative
24 wasn't anything too different than what you told us,
25 just from their angle. It's just when I was sitting

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1 had to change abuse. Would have sent you, but I didn't
2 record last night because I was on such a chaotic
3 deadline. Will tell you everything.

4 Did you understand that Mr. Rothman had
5 some changes for Mrs. Lively that he required her to
6 make in order to show the film at Book Bonanza?

7 A. I -- yes, I was aware that he wanted changes to
8 the film.

9 Q. And did you understand that she worked very
10 late in order to make those changes so that --

11 A. She worked late every single day on that movie.
12 I've never seen anyone work so much in my life.

13 Q. So you find her to be a very hard worker?

14 A. Yes.

15 Q. And then the book -- the movie was shown at
16 Book Bonanza; is that right?

17 A. Yes.

18 Q. And how did it go?

19 A. It was the best day of my life.

20 Q. And tell me why.

21 A. We had -- well, for one, you know, hosting a
22 convention is a full-time job in itself, and then being
23 told days before that you then are adding a whole other
24 essential convention, getting all those people to a
25 movie theater just felt like lots could go wrong.

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1 Everything was seamless. Sony sent so many people to
2 make sure everything went well. And everyone was so
3 happy, and it was just a great night all around.

4 Q. And how was the reception from the fans?

5 A. A lot of crying. A lot of joy. I don't think
6 I heard one negative thing.

7 Q. That must have been very satisfying for you.

8 A. It was so much fun.

9 (Exhibit 24 was marked for identification.)

10 BY MS. HUDSON:

11 Q. I'm going to hand you Exhibit 24. Exhibit 4
12 [sic] is a text change between Mrs. Lively and
13 Mrs. Hoover, Bates stamped BL-28508 through 509.

14 This --

15 Do you recognize this, Mrs. Hoover, as a
16 text chain between you, Mrs. Lively, and Travis Moore?

17 A. Yes.

18 O. I'm sorry. I left out Shane Reid.

19 A. And Shane Reid.

20 Q. And Travis Moore and Shane Reid, as you
21 previously described, you were the editors that worked
22 with Mrs. Lively in the editing room and that you had
23 met when you were in there too?

24 **A. Correct.**

25 Q. And this is -- you recognize this as a text

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1 chain that you participated in?

2 A. Yes.

3 Q. Okay. And at the top, Mrs. Lively says: Could.
4 Not. Have. Gone. Better. I can't wait to tell you
5 everything. I don't cry, and I'm in the car crying. It
6 was such a beautiful experience.

7 Did you understand her to be -- what did
8 you understand her to be describing?

9 A. She was letting Travis and Shane know how well
10 it went because they also had worked very hard on the
11 film and weren't able to be there, and she was just
12 letting them know that everyone loved it.

13 Q. And your -- you wrote: It was amazing. The
14 audience gave a standing ovation -- or cornvation?

15 A. Inside joke.

16 Q. Inside joke.

17 Was there a standing ovation?

18 A. Yes.

19 Q. What -- other than -- I mean, a standing
20 ovation is a big deal. Were there any other reactions
21 from the crowd? Were they -- was there yelling? Was
22 there --

23 A. Oh, yeah, all --

24 Q. -- you know, shouting and --

25 A. -- everyone was just very much supportive, and

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1 I -- I felt they were happy with the adaptation, but,
2 yeah, there was a lot of, like, cheering, and it was a
3 beautiful moment.

4 Q. Okay. I'm going to hand you a -- we're going
5 to go back to Exhibit 15, if you can find that in your
6 pile. And I'm going to draw your attention to
7 Hoover 95. There's a text at the bottom at June 16th at
8 7:07 p.m., and this is the text chain that you
9 previously said was between you and Josh Greenstein at
10 Sony.

11 Do you recall that?

12 A. Yes.

13 Q. And it looks like Mr. Greenstein says:
14 Congratulations. Heard it could not have gone better.

15 Is that a text from him?

16 A. Yes.

17 Q. And your response is: It was so great.
18 Everyone loved Blake and the movie, and even the
19 transferring of all the people went well. Great weekend
20 all around. Thank you for making it happen.

21 Do you know how it got back to
22 Mr. Greenstein that it had gone so well at that time?

23 A. I -- I don't know who told him.

24 (Exhibit 25 was marked for identification.)

25 BY MS. HUDSON:

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1 A. Yes.

2 Q. And you participated in this text exchange?

3 A. Yes.

4 Q. This document is dated August 14th through
5 15th, 2024, Bates-stamped BL-21264 through 268.

6 This -- is this text exchange after the
7 premiere of the film?

8 A. I believe so.

9 Q. Okay. Do you remember when the film premiered?

10 A. I don't.

11 Q. Does August 9th sound right?

12 A. Yeah.

13 Q. Okay. I think we can -- can we all agree that
14 this film premiered August 9th?

15 A. So this was after.

16 MS. ZELDIN: No. The premiere was the 6th.
17 This -- 9th was the release.

18 MS. HUDSON: Fair enough. Premiere was
19 August 6th. Release was August 9th.

20 BY MS. HUDSON:

21 Q. But this was after the film -- the final film
22 was public, right?

23 A. Uh-huh.

24 Q. Okay.

25 A. Yes. Sorry.

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1 Q. No problem.

2 What -- if you take a look at the top of
3 the page on 21267, there's a reference to an Instagram
4 post here for Wayfarer Studios that posts an article
5 that says "It Ends With Us Ending Explained: Why
6 Justin Baldoni Changed Ryle's Fate."

7 Did you see that Instagram post when it was
8 posted?

9 A. Yes.

10 Q. And did you have concerns about it?

11 A. Yes.

12 Q. And is this text exchange between you and
13 Mrs. Lively you telling her about the concerns that you
14 had with this post?

15 A. Yes.

16 Q. Okay. And did you tell anyone else you had
17 concerns with this post?

18 A. Justin and Jamey.

19 Q. And what did you tell them?

20 A. I asked them to take it down because it was not
21 true.

22 Q. And what about it was not true?

23 A. He did an article about how in the -- in the
24 script and in the movie, he had Lily leave Ryle, and
25 Ryle did not get custody and did not -- was no longer in

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1 their lives, and it upset me because the online
2 narrative at the time was very much against the females
3 in the movie -- or not that -- that were involved in the
4 movie.

5 Blake and I, Isabella were getting a lot of
6 online hate, and I felt like Justin was posting things,
7 and all the comments on it were about how great he is
8 for talking about domestic violence and all this stuff
9 while we were silent about it, and -- and this article,
10 in particular, was very damaging for me because it made
11 it look like I -- I should have, you know -- not that I
12 should have written the ending differently, but that he
13 chose to change the ending. But I knew that wasn't true
14 because after I'd written book two, we had many
15 conversations about a potential second movie, and in
16 order for there to be a second movie, he would still be
17 part of Lily and the child's life.

18 And so I felt like this article and this
19 interview he did was -- he did it to try to make himself
20 look like he was aligned with what people were saying
21 negatively about us and not actually speaking the truth
22 in it.

23 BY MS. HUDSON:

24 Q. Uh-huh.

25 A. And so I asked him and Jamey if they could

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1 please take it down because it -- it just wasn't true.

2 Q. Uh-huh.

3 And what -- what was it that made you feel
4 that Mr. Baldoni was sharing an article for the purpose
5 of affecting the conversation?

6 MS. ZELDIN: Objection.

7 THE WITNESS: I --

8 BY MS. HUDSON:

9 Q. Well, if I mis-summarized that, feel free to
10 correct me.

11 A. I -- I felt like, at this point in time, the
12 movie had released; it was doing really well. But stuff
13 just suddenly started popping up online negatively about
14 Blake and -- and me and -- and the way we marketed the
15 movie, and it was all just really shocking, and I think
16 the most shocking thing was -- was how silent Justin was
17 about the online abuse the women in the movie were
18 getting.

19 Q. Uh-huh.

20 A. And this was -- to me, went against everything
21 he would preach about supporting women, and I felt very
22 much disappointed that the -- the people who made this
23 film were staying silent when especially Blake was
24 getting so much online hate, and a lot of it was about
25 the flowers and her wearing floral jeans, and I just

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1 didn't understand why all of that was being said when
2 Justin and I made bouquets, and -- and, you know, like,
3 this was his movie, and I'm sure he approved the
4 marketing plan and -- that we went along with.

5 And so I -- I was very confused why the
6 things that we were being vilified for were -- were not
7 being defended --

8 Q. What --

9 A. -- or set straight.

10 Q. What would you have wanted Mr. Baldoni to do?

11 MS. ZELDIN: Objection.

12 THE WITNESS: It would have been nice if he
13 or Sony or Jamey, you know, like, shared the marketing
14 plan and like -- literally, like, I -- I showed up and
15 did all of my PR and worked my ass off -- excuse
16 me -- and I -- I felt like -- oh, and when I say that, I
17 mean about the PR -- and I -- I read a teleprompter a
18 lot of times. I did exactly what I was told to do, but
19 then, afterward, you know, a lot of the stuff we talked
20 about in interviews, we did at the press junket, a lot
21 of things about domestic violence, like, they were just
22 not shared anywhere.

23 And so we were -- online, it made it look
24 like we were completely ignoring the subject and -- and
25 were having fun and playing with flowers, and it just

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1 felt very unfair that -- that the women were being
2 vilified for the things that I also saw the men do.

3 BY MS. HUDSON:

4 Q. So did you share your feelings about
5 the -- this specific article with Mr. Baldoni?

6 A. Yes, I did.

7 Q. Did you share them with Mr. Heath?

8 A. Yes. It was a group text.

9 (Exhibit 27 was marked for identification.)

10 BY MS. HUDSON:

11 Q. I've handed you what we marked as Exhibit 27.
12 Exhibit 27 is a series of texts Bates-stamped Hoover
13 0237 through 256.

14 And, Mrs. Hoover, based on the way that
15 this folder was produced by your counsel, our
16 understanding is that these are -- this is the complete
17 text chain that you have in your possession between you,
18 Mr. Heath, and Mr. Baldoni as a group text --

19 A. Yes.

20 Q. -- is that correct?

21 A. Yes.

22 MS. HUDSON: And, Mr. Stinson, did you
23 check that at the lunch break?

24 MR. STINSON: Yes.

25 MS. HUDSON: Okay.

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1 confirm that what follows Mr. Baldoni's response on 252
2 is your response to him.

3 A. It is.

4 Q. Okay. And that continues through 255?

5 A. Yes.

6 Q. All right. You can set that aside.

7 I'm going to -- let me just ask you a
8 question: You mentioned this negative online commentary
9 directed towards the women of the film --

10 A. Uh-huh.

11 Q. -- at this time, August of 2024.

12 Did you experience that yourself prior to
13 the premiere on August 6th?

14 A. No. It was -- it was -- it was pretty sudden
15 and shocking, to be honest. I mean, I experience
16 negative stuff online all the time. But if you're
17 referring to, you know, like, the negative commentary
18 regarding the marketing and all that stuff, that was all
19 new.

20 Q. And had the marketing changed at all in terms
21 of the themes?

22 A. I mean, it was pretty much done by the time the
23 movie came out. I didn't do any more marketing after
24 that.

25 Q. But the types of, you know, florals and things

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1 along those lines that were being marketed after the
2 film premiered and following, were they any different
3 than what you had been doing at Book Bonanza, for
4 example, or in any of the other promotional experiences
5 you had participated in?

6 A. Not that I know of. But after the premiere,
7 when everything started kind of going south online, I'd
8 just stay offline. So I don't know if there was -- how
9 they marketed things online. I just -- I don't have
10 knowledge of -- of much after the premiere.

11 Q. And the negative online -- can you tell me more
12 specifically what you were experiencing?

13 A. Just when I would try to post about the movie,
14 a lot of attacks and -- and comments that I wasn't used
15 to, you know, along the lines of Justin -- my having
16 unfollowed Justin. People were curious about the
17 dis- -- like, what the discourse was. And then people
18 were starting to express that they were upset by the
19 absence of Justin in -- in some of the promo.
20 And -- but you know how the internet is. They can't say
21 it in a kind or concerning way, so it was just a lot of
22 attacks. And then also just all the articles that were
23 out there about everything related to the movie that
24 were negative.

25 Q. At some point, did you delete your Instagram?

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1 BY MS. ZELDIN:

2 Q. And you never appeared in pictures at the
3 premiere with Justin; is that correct?

4 A. No. I was ushered down a line and took to my
5 seat. I didn't even -- I was only in pictures with
6 whoever was in the tent as we were walking through.

7 Q. So --

8 A. That wasn't a photoshoot, like, experience, as
9 far as I know.

10 Q. If Justin had asked you to be in a photograph
11 with him, would you have done so?

12 MS. HUDSON: Objection.

13 THE WITNESS: Probably not that night, no.

14 BY MS. ZELDIN:

15 Q. And why not?

16 A. I was upset with him for things I had heard.

17 Q. Things you had heard from --

18 A. Been told by Blake.

19 Q. I see.

20 And things you had been told by Blake are
21 the same things we've been talking about before?

22 A. And some other stuff.

23 Q. What other stuff?

24 A. She told me that he -- well, the religion
25 thing, for one; that he told everyone on set that we met

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1 through his faith. She told me that he would -- would
2 use my name and tell everyone that we were basically
3 best friends, and so when he wasn't getting his way in a
4 scene, that he would say: Well, the author wants it
5 this way.

6 I can't recall other things. I don't know.

7 Q. I see.

8 So these were what you would call -- would
9 you characterize these things as gossip?

10 MS. HUDSON: Objection.

11 THE WITNESS: Maybe.

12 BY MS. ZELDIN:

13 Q. So --

14 A. I just took it as things she had experienced
15 and told me. Like, I didn't know if they were accurate
16 or not.

17 Q. Did you do anything to verify that Justin had,
18 in fact, said that he met you through the church?

19 A. No. Because at the time, I already wasn't
20 speaking to Justin because of things that happened
21 between he and I that had nothing to do with Blake.

22 Q. Did it upset you that she was gossiping?

23 MS. HUDSON: Objection.

24 THE WITNESS: I mean, there were a lot of
25 times that I preferred -- I mean, all the time I

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1 person, who was by me duly sworn to testify the truth
2 concerning the matters in controversy in this cause;

3 And that the examination was reduced to writing by
4 computer transcription under my supervision; that the
5 deposition is a true record of the testimony given by
6 the witness.

7 I further certify that I am neither attorney or
8 counsel for, nor related to or employed by, any of the
9 parties to the action in which this deposition is taken,
10 and further that I am not a relative or employee of any
11 attorney or counsel employed by the parties hereto, or
12 financially interested in the action.

13 Given under my hand and seal of office on this 30th
14 day of September.

15 

16 KARI BEHAN, CCR, CSR

17 Texas CSR NO. 8564;

18 Expiration Date: 7-31-2026

19 VERITEXT LEGAL SOLUTIONS

20 Firm Registration No. 571

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