

Exhibit 10

1
2 ** C O N F I D E N T I A L **
3 * CONTAINS ATTORNEYS' EYES ONLY MATERIAL *
4 UNITED STATES DISTRICT COURT
5 SOUTHERN DISTRICT OF NEW YORK
6 Case No. 1:24-CV-10049-LJL
(Consolidated with 1:25-cv-00449-LJL)
6 -----x
7 BLAKE LIVELY,
8 Plaintiff,
9 - against -
10 WAYFARER STUDIOS LLC, a Delaware
11 Limited Liability Company, JUSTIN
12 BALDONI, an individual, JAMEY HEATH, an
13 individual, STEVE SAROWITZ, an individual,
14 IT ENDS WITH US MOVIE LLC, a California
15 Limited Liability Company, MELISSA
16 NATHAN, an individual, THE AGENCY
17 GROUP PR LLC, a Delaware Limited Liability
18 Company, JENNIFER ABEL, an individual,
19 JED WALLACE, an individual, and STREET
20 RELATIONS INC., a California Corporation,
21 Defendants.
22 -----x
23 (Caption continued)
24 September 30, 2025
25 10:09 a.m.

17
18 Videotaped Deposition of ISABELA
19 FERRER, taken by Defendants, pursuant to
20 Subpoena, held at the offices of Meister
21 Seelig & Fein PLLC, 125 Park Avenue, New
22 York, New York, before Todd DeSimone, a
23 Registered Professional Reporter and Notary
24 Public of the State of New York.
25

1 FERRER - CONFIDENTIAL

2 A. That was a call-back, so Justin
3 and a reader were on the Zoom call with me.

4 Q. Okay. Do you recall how long
5 that Zoom lasted?

6 A. I would say around 20 minutes.

7 Q. Do you recall the name of the
8 reader who was participating?

9 A. No.

10 Q. Was it a male or a female?

11 A. It was a male.

12 Q. Did anything occur during that
13 20-minute Zoom audition that caused you
14 concern about Mr. Baldoni?

15 A. No.

16 Q. Anything inappropriate happen
17 during the course of that audition?

18 A. No.

19 Q. Were you eventually offered the
20 role in this movie?

21 A. Yes.

22 Q. And is it okay if I refer to it
23 as the young Lily?

24 A. Yes.

25 Q. When were you offered the role

1 FERRER - CONFIDENTIAL

2 in relation to the call-back?

3 A. I believe the next week.

4 Q. And how was that offer
5 communicated to you?

6 A. Over the phone by my manager.

7 Q. Do you know what role, if any,
8 Justin Baldoni had in getting you that
9 role?

10 MS. ROESER: Objection.

11 A. Are you asking if I know --
12 what I know now or what I knew at the time?

13 Q. What you know now.

14 A. I believe he had a pretty
15 strong part in the casting process.

16 Q. And what -- I'm sorry, did you
17 finish?

18 A. Yeah.

19 Q. What is the basis for your
20 belief that he had a strong role in the
21 casting process?

22 A. From what we spoke about and
23 the way that he spoke about the casting
24 process with me and him being a producer
25 and director on the part, or on the movie.

1 FERRER - CONFIDENTIAL

2 Q. When for the first time did you
3 learn that Justin Baldoni was both acting
4 in the movie, directing the movie, and a
5 producer of the movie?

6 A. When I got the audition.

7 Q. The e-mail advising you of the
8 role from your manager?

9 A. Yes.

10 Q. Prior to receiving the e-mail
11 from your manager about the role, were you
12 aware of the project It Ends With Us?

13 A. No.

14 Q. Had you ever heard of It Ends
15 With Us?

16 A. Yes.

17 Q. And in what context had you
18 heard of it?

19 A. A friend of mine had read the
20 book.

21 Q. And do you recall what, if
22 anything, your friend told you about the
23 book?

24 A. It made her cry.

25 Q. Did she tell you why it made

1 FERRER - CONFIDENTIAL

2 her cry?

3 A. I believe she said something
4 about it being an intense book to read.

5 Q. Anything else that you could
6 recall?

7 A. No.

8 Q. Do you know who the author of
9 the book is?

10 A. Yes.

11 Q. And who is the author?

12 A. Colleen Hoover.

13 Q. Had you ever met Colleen Hoover
14 before your work on this project?

15 A. No.

16 Q. Did you know who Colleen Hoover
17 was before you began working on this
18 project?

19 A. No.

20 Q. After you were offered the
21 role, did you read the book?

22 A. Yes.

23 Q. When in relation to receiving
24 the offer did you read the book?

25 A. I started reading the book in

1 FERRER - CONFIDENTIAL

2 between my first audition and the
3 call-back.

4 Q. And did you finish reading it?

5 A. Yes.

6 Q. And did you read it just the
7 one time?

8 A. No.

9 Q. How many times did you read the
10 book?

11 A. I would say three times.

12 Q. And is there a reason why you
13 read the book?

14 A. To inform myself on the
15 character.

16 Q. Was reading the book helpful
17 for you in informing yourself about the
18 character?

19 A. Yes.

20 Q. Had you ever appeared in any
21 other productions, TV shows, movies,
22 theater, that were based on a book?

23 A. No.

24 Q. Prior to your work on this
25 project, and sometimes I will say project,

1 FERRER - CONFIDENTIAL

2 A. Yes.

3 Q. Can you tell me what happened
4 during the filming of that scene?

5 A. My co-star and I were filming a
6 sex scene and after a couple of takes,
7 after cut, Justin Baldoni turned to my
8 co-star and I and said "I know I'm not
9 supposed to say this, but that was hot."

10 Q. Was anyone else present when
11 Mr. Baldoni said that?

12 A. Yes.

13 Q. Who else was present?

14 A. The crew that were in the room
15 for the closed set, my co-star, and I don't
16 recall her being there, but I'm assuming
17 the intimacy coordinator.

18 Q. What, if anything, did you say
19 after Mr. Baldoni made that comment?

20 A. I laughed it off.

21 Q. What, if anything, did Alex say
22 after Mr. Baldoni made that comment?

23 A. Nothing.

24 Q. Did you and Alex ever discuss
25 that comment subsequently?

1 FERRER - CONFIDENTIAL

2 rephrase the question.

3 A. Wonderful.

4 Q. Who referred you to your
5 attorney?

6 A. My manager.

7 Q. Had you been served with a
8 subpoena before you retained Mr. Michelman?

9 A. No.

10 Q. I think you said there were
11 three incidents that you felt were
12 inappropriate or unwelcome actions, conduct
13 or comments, and we have discussed the one,
14 the intimate scene, so far, correct?

15 A. Yes.

16 Q. Can you tell me about the
17 second incident?

18 A. There was a scene in which my
19 character, Lily, is in her kitchen and the
20 other character played by my co-star Alex
21 Neustaedter is making cookies and there was
22 a note that was a change to the scene in
23 which as he was feeding me cookie dough
24 from a spoon, Justin offered that I lick
25 the cookie dough off of the spoon and look

1 FERRER - CONFIDENTIAL

2 up at my co-star in a way that deemed to me
3 kind of inappropriate given the context of
4 the scene.

5 Q. Did you make any complaint to
6 Mr. Baldoni at that time?

7 A. No.

8 MS. ROESER: Objection.

9 Q. Did you make a complaint to
10 anyone at Wayfarer about that scene?

11 MS. ROESER: Objection.

12 A. No.

13 Q. Did you contact your manager
14 about your concerns over the note or change
15 to that scene?

16 A. No.

17 Q. Did you contact your agent
18 about the note or the change to that scene?

19 A. No.

20 Q. Did you complain to Alex that
21 you felt that that was not an
22 appropriate -- that it was not an
23 appropriate change to the scene?

24 MS. ROESER: Objection.

25 A. Yes.

1 FERRER - CONFIDENTIAL

2 this case?

3 A. Yes.

4 Q. Anything else that has impacted
5 your opinion of Mr. Baldoni other than what
6 you have already told us?

7 A. What Alex expressed to me that
8 he experienced on set, which had to do with
9 me.

10 Q. Okay. Can you tell us about
11 that?

12 A. The first day I met Alex and
13 the first day I was on set, before the
14 intimacy rehearsal, which I had earlier
15 referenced, I was told this after the fact,
16 months later, because Alex expressed that
17 he didn't want me to feel uncomfortable,
18 but Alex told me that he had had a private
19 conversation while we were on the way to
20 the car to drive to Jersey City in which
21 Justin pulled Alex aside and said "I really
22 want you to get to know Isabela well," and
23 winked at him.

24 And other than that, there was
25 a time, the second to last day before

1 FERRER - CONFIDENTIAL

2 Q. Did Ms. Lively ever share with
3 you an incident where Mr. Baldoni was in
4 her trailer and crying?

5 A. I don't recall.

6 Q. Are you aware of Mr. Baldoni or
7 Mr. Heath or anyone from Wayfarer
8 encouraging Blake to film a birth scene in
9 the nude?

10 A. No.

11 Q. And I apologize if I have
12 already asked this, were you ever on set
13 during the filming when Blake was filming?

14 A. Yes.

15 Q. Did you ever witness Justin
16 Baldoni improvise physical contact with
17 Blake Lively?

18 MS. ROESER: Objection.

19 A. No.

20 Q. Did Ms. Lively ever complain to
21 you that Justin Baldoni was improvising
22 physical contact with her?

23 A. No.

24 (Ferrer Exhibit 2 marked for
25 identification.)

1 FERRER - CONFIDENTIAL

2 Q. Ms. Ferrer, I'm going to show
3 you what we have marked as Ferrer No. 2,
4 and I'm going to ask if you recognize this
5 document?

6 A. Yes.

7 Q. And at some point in this
8 litigation were you asked to make a search
9 for any records or communications that you
10 may have that might be relevant to the
11 claims or defenses in this action?

12 A. Yes.

13 Q. And is this one of those
14 documents that you retrieved and produced
15 pursuant to the subpoena?

16 A. Yes.

17 Q. And I think you said in May of
18 2023 you were filming or on set?

19 A. Yes, my one day of filming.

20 Q. And did you meet the intimacy
21 coordinator at that time?

22 A. No.

23 Q. When for the first time did you
24 meet the intimacy coordinator?

25 A. In June, in the intimacy

1 FERRER - CONFIDENTIAL

2 rehearsal.

3 Q. The one that you had already
4 discussed with us?

5 A. Yes.

6 Q. So Ferrer No. 2 is a text
7 exchange, and it is Bates stamped IF_24,
8 and those are just the little red numbers
9 at the bottom for identification purposes.

10 Was this text exchange your
11 first interaction with Lizzy Talbot, the
12 intimacy coordinator for It Ends With Us?

13 A. I can't recall if I met her
14 first or if this text -- this text was
15 first.

16 Q. And the only reason I ask is on
17 June 16th, 2023 at 7:15 p.m. there is a
18 text at the top that says "Hey Isabella!
19 It's Lizzy here - I intimacy coordinator
20 for IEWU," which I'm going to assume stands
21 for It Ends With Us. So I'm assuming this
22 may have been your first interaction with
23 Ms. Talbot?

24 A. Yes.

25 Q. And then it goes on to read

1 FERRER - CONFIDENTIAL

2 "Are you free later this afternoon for a
3 quick chat about the Lily and Atlas scenes?
4 Thanks! Lizzy."

5 Did I read that correctly?

6 A. Yes.

7 Q. Did you wind up having a chat
8 with Lizzy Talbot about the scenes between
9 you and Alex?

10 A. Yes.

11 Q. Anything during that
12 conversation with Lizzy Talbot that was
13 concerning?

14 A. No.

15 Q. If you go to the bottom half of
16 the page, the blue box on June 23rd, 2023
17 at 5:09, is that a text that you sent?

18 A. Yes.

19 Q. And did you send that text --
20 withdrawn.

21 When in relation to filming did
22 you send that text?

23 A. This was in the duration of
24 when I was filming.

25 Q. So this was subsequent to the

1 FERRER - CONFIDENTIAL

2 rehearsal?

3 A. After the rehearsal.

4 Q. And the scene was actually
5 filmed; is that correct?

6 A. Yes.

7 Q. Can you read what you wrote to
8 Lizzy Talbot?

9 A. Sure. "Thank you so so much
10 for your help!! You were incredible and
11 given I've never done that before I felt
12 like it was the easiest thing ever! So
13 thank you!!"

14 Q. And was that sent after an
15 intimate scene had been filmed?

16 A. Yes.

17 Q. Did you have any issues,
18 concerns, or problems with that scene?

19 MS. ROESER: Objection.

20 MR. MICHELMAN: Objection.

21 A. Other than what I referenced
22 earlier?

23 Q. Yes.

24 A. No.

25 Q. Other than what you have

1 FERRER - CONFIDENTIAL

2 referenced earlier.

3 A. No.

4 Q. Did you ever complain to Lizzy
5 Talbot about what you testified to earlier?

6 MS. ROESER: Objection.

7 A. No.

8 Q. Did anyone prompt you to send
9 this text to Ms. Talbot?

10 A. No.

11 Q. Did anyone ask that you send
12 this text to Ms. Talbot?

13 A. No.

14 Q. Was this an accurate
15 characterization of how you felt at the
16 time when you sent this text?

17 MR. MICHELMAN: Objection.

18 MS. ROESER: Join.

19 A. It's how I felt when working
20 with Lizzy, yes.

21 Q. Was Justin present when the
22 scene was filmed?

23 A. Yes.

24 Q. Was he acting as director at
25 the time when the intimate scene was

1 FERRER - ATTORNEYS' EYES ONLY

2 lol."

3 Why were you of the opinion
4 that Justin Baldoni was the best con artist
5 you had ever witnessed?

6 A. I think I at this time believed
7 that he, due to us all seemingly doing our
8 press without him, there had been a
9 narrative that was spun in which he had
10 been victim to us all bullying him and
11 icing him out of press and out of all of
12 these things, in which then he was able to
13 play up this narrative that he had been a
14 victim to us bullying him, which I
15 obviously don't think I ever bullied him.
16 But I guess I saw the way that things were
17 playing out online as an ingenuine
18 narrative, so I guess I associated that
19 with a con artist. That was the
20 description I used.

21 Q. Okay. Was it Justin's idea
22 that you and the other cast members and
23 Colleen do press without him?

24 MR. MICHELMAN: Objection.

25 MS. ROESER: Objection.

1 FERRER - ATTORNEYS' EYES ONLY

2 Q. On page IF_28, in the middle
3 you wrote "Absolutely. I really hope he
4 feels one day morally responsible for
5 promoting bullying towards us after the way
6 he's treated us already. And I'm grateful
7 I'm not taking it too personally and am
8 aware that it's bullshit." I'm going to
9 stop there.

10 How did Justin promote bullying
11 towards you?

12 A. Given the online hate that I
13 was getting, it seemed like there was
14 nothing being done to speak out against the
15 bullying that was happening to the women
16 and the cast, while he was going along with
17 the rest of his press run, and I assume
18 anybody that was online would have seen
19 what was going on.

20 So also from what I had
21 gathered information-wise from people such
22 as Blake, it was kind of assumed that due
23 to hiring a PR crisis manager that this
24 kind of narrative was starting to get spun
25 online.

1 FERRER - ATTORNEYS' EYES ONLY
2 I think your answer was "I think at that
3 point the fact that he wasn't recognizing
4 that something was happening was enough for
5 me to not want to speak to him." And I
6 think you are referring to the something
7 happening as the negative online comments;
8 is that correct?

9 A. Yes.

10 MS. ROESER: Objection.

11 Q. Were you seeing any negative
12 online comments about Justin Baldoni?

13 A. No.

14 Q. The only negativity was
15 towards, that you saw, was towards your
16 fellow actors?

17 A. And myself.

18 Q. And yourself?

19 A. Mainly me.

20 MS. ROESER: Objection.

21 Q. You can put that one to the
22 side.

23 (Ferrer Exhibit 7 marked for
24 identification.)

25 Q. Ms. Ferrer, I'm going to show

1 FERRER - CONFIDENTIAL

2 A. No.

3 Q. Did Blake Lively ever suggest
4 to you that this movie is a girls night out
5 kind of movie?

6 MS. ROESER: Objection.

7 MR. MICHELMAN: Objection.

8 A. No.

9 Q. In the next sentence of that
10 same text you wrote "Justin has been
11 playing all of this up because he knows
12 he's about to get his shit exposed so he's
13 hyping her up and then playing the victim
14 at the same time."

15 What did you mean when you said
16 "Justin has been playing all of this up"?

17 A. I think I meant the bullying
18 and the narrative that was coming out after
19 the premieres and after it was deemed by
20 the public on social media that me and
21 Blake and the rest of the cast didn't care
22 about the real meaning of this movie, and
23 given his, again, lack of really like
24 speaking up for any of us or talking or
25 coming out publicly to even defend not

1 FERRER - CONFIDENTIAL

2 Blake, but even just me, I found it to be
3 kind of in line with then him promoting
4 himself and his voiced opinions about
5 domestic violence and him being able to
6 kind of be the only person to talk about
7 that. So it seemed to me that he was
8 playing this narrative up that we don't
9 care and that he does.

10 Q. Do you know if Justin wanted to
11 participate in the press with you?

12 MS. ROESER: Objection.

13 A. I don't know.

14 Q. Do you know if he wanted to
15 participate in press with Blake Lively?

16 MS. ROESER: Objection.

17 A. I don't know.

18 Q. Do you know if he wanted to
19 participate in press with Colleen Hoover?

20 MS. ROESER: Objection.

21 A. Yes.

22 Q. You know that he did want to?

23 MR. MICHELMAN: Objection.

24 MS. ROESER: Join.

25 A. I know that he was going to and

1 FERRER - CONFIDENTIAL

2 she wrote "instead of whatever the writer
3 said about bring your GFs wear florals"?

4 MS. ROESER: Objection.

5 A. I think she is referencing
6 Colleen saying something in an Instagram
7 post.

8 Q. Do you recall what Colleen's
9 Instagram post was?

10 A. I feel like it might have been
11 a joint Instagram with her and other
12 castmates in which the caption was or had
13 like something under these terms, but I
14 don't recall the specific post.

15 Q. Okay. You responded "Right,
16 which is just wild because the only reason
17 we were told to speak like that was through
18 the studio and Justin is only speaking on
19 DV to make everyone look bad."

20 Was it the studio who advised
21 you of how to market this film?

22 MR. MICHELMAN: Objection.

23 A. From I was told, yes.

24 Q. And did you ever speak with
25 Justin as to why he was speaking on

1 FERRER - CONFIDENTIAL

2 domestic violence?

3 A. No.

4 Q. What is the basis for your
5 opinion or your text that Justin was only
6 speaking on domestic violence to make
7 everyone look bad?

8 A. I think the opinion was based
9 off of the context that I had gotten about
10 the timing of when he decided to speak on
11 it, when we were told to not, and I think
12 the studio I'm referencing is Wayfarer. So
13 I think the dichotomy of Wayfarer telling
14 us to not speak on it and then Justin going
15 and speaking on it kind of looked to me in
16 conclusion like he was trying to make it
17 look like we wouldn't want to talk about
18 it.

19 Q. And was that anything more than
20 an assumption on your part?

21 MS. ROESER: Objection.

22 A. It was an educated guess.

23 Q. What went into you forming that
24 educated guess?

25 A. Me being told that I couldn't

1 FERRER - CONFIDENTIAL

2 speak on domestic violence by his
3 production company and then him going and
4 speaking on it.

5 Q. Anything other than that?

6 A. No.

7 Q. And at the point of this text,
8 had you already viewed his cut or a portion
9 of his cut of the movie?

10 A. I had seen I think two scenes
11 he had shown me, like portions of my scenes
12 during reshoots months prior.

13 Q. And where did he show that to
14 you?

15 A. During reshoots on set.

16 Q. Is that at the New Jersey
17 location?

18 A. Yes.

19 Q. Was there anything that
20 happened during those reshoots that was
21 inappropriate?

22 MS. ROESER: Objection.

23 A. No.

24 Q. Anything about him showing you
25 the two scenes that was inappropriate?

1 FERRER - CONFIDENTIAL

2 A. Yes.

3 Q. What kind of job did you hold
4 before?

5 A. I worked a lot of jobs in the
6 restaurant industry.

7 Q. Okay. Had you ever worked in
8 the entertainment industry before?

9 A. Professionally, no.

10 Q. Prior to joining It Ends With
11 Us, had you ever received training on
12 harassment in the workplace?

13 A. No.

14 Q. Prior to joining It Ends With
15 Us, had you ever received a training on
16 appropriate workplace behavior?

17 MR. SCHUSTER: Objection.

18 A. No.

19 Q. And when you started working on
20 the film did you -- withdrawn.

21 Did Wayfarer provide you with
22 any workplace harassment training in
23 connection with It Ends With Us?

24 A. No.

25 Q. Do you recall receiving, for

1 FERRER - CONFIDENTIAL

2 example, an employee handbook that
3 contained policies with respect to
4 harassment or discrimination?

5 A. No.

6 Q. Did you attend any sort of
7 video training or online course about safe
8 work environments or sexual harassment in
9 connection with the film?

10 A. No.

11 Q. If I use the word "the film"
12 during these questions, will you understand
13 that I'm referring to It Ends With Us?

14 A. Yes.

15 Q. Okay, great.

16 Did you understand whether
17 there was a human resources department in
18 connection with the film?

19 MR. SCHUSTER: Objection.

20 A. Not really, no.

21 Q. Did you understand whether
22 there was someone that you could go to if
23 you had concerns about workplace behavior
24 in connection with the film?

25 A. I assumed there would be if I

1 FERRER - CONFIDENTIAL

2 needed to, but I didn't think about it
3 really.

4 Q. Do you, even as you sit here,
5 have any understanding of who that person
6 who you could raise concerns about behavior
7 on set would be?

8 A. No.

9 Q. Do you know if Wayfarer has a
10 human resources department?

11 MR. SCHUSTER: Objection.

12 A. I don't know.

13 Q. Were you ever provided any sort
14 of hotline that you could call in
15 connection with the film if you had
16 concerns about the workplace?

17 MR. SCHUSTER: Objection.

18 A. No.

19 Q. Were you provided with any
20 anonymous e-mail that you could contact if
21 you had concerns about behavior in
22 connection with the film?

23 A. No.

24 Q. Do you have an understanding as
25 to what legally qualifies as a complaint of

1 FERRER - CONFIDENTIAL

2 A. No.

3 Q. Earlier in your testimony you
4 spoke about three incidents that made you
5 uncomfortable on set. Do you recall that?

6 A. Yes.

7 Q. I believe the first one was a
8 comment from Mr. Baldoni along the lines of
9 "that was hot," following an intimate
10 scene; is that right?

11 A. Yes.

12 Q. Why did that make you
13 uncomfortable?

14 A. It didn't feel appropriate in a
15 work environment, and given that it was not
16 necessarily like a note of any kind to do
17 with my acting, it felt out of place and
18 strange to hear about a scene, especially a
19 scene that is meant to be a PG scene about
20 two young teenagers having a very like
21 innocent experience intimately, it felt out
22 of place to hear my director say that as a
23 personal thing to me and my co-star.

24 Q. You felt that the comment was
25 directed to you personally?

1 FERRER - CONFIDENTIAL

2 MR. SCHUSTER: Objection.

3 A. It felt like it was directed to
4 me and my co-stars -- or co-star
5 personally, yeah.

6 Q. You mentioned that -- did you
7 say it was -- the scene was meant to be an
8 innocent experience?

9 A. Yeah, the context of the scene
10 is that my character was losing her
11 virginity, and the way it was described in
12 the script and kind of broken down with the
13 intimacy coordinator is it shouldn't have
14 been sexy or hot or any term like that and
15 it was much more so meant to be, yeah,
16 innocent, leaning more so towards a PG kind
17 of intimate scene.

18 Q. Did you have a conversation
19 with the intimacy coordinator in which she
20 mentioned that the scene in which your
21 character loses her virginity was not meant
22 to be sexy or hot?

23 A. I recall having a discussion
24 not with those exact words, but along the
25 lines of specifically to do with certain

1 FERRER - CONFIDENTIAL

2 movements that we had choreographed and
3 that it shouldn't feel -- it shouldn't
4 necessarily feel adult.

5 Q. Do you recall whether in
6 rehearsing the intimate movements for that
7 scene in which your character loses her
8 virginity Mr. Baldoni suggested or
9 recommended particular sexual positions
10 that were more adult than innocent?

11 A. No.

12 Q. So the comment from Mr. Baldoni
13 with respect to -- withdrawn.

14 So after you filmed a scene in
15 which your character was to lose her
16 virginity is when Mr. Baldoni commented
17 "that was hot"?

18 A. Quote, "I'm not supposed to say
19 this, but that was hot," yeah.

20 Q. He prefaced this with "I know
21 I'm not supposed to say this"?

22 A. I can't remember if -- I'm not
23 sure if it was -- if he said quote, "I'm
24 not sure if I'm supposed to say this" or
25 "I'm not supposed to say this," but I know

1 FERRER - CONFIDENTIAL

2 that "not supposed to say this" was in the
3 context.

4 Q. The second instance that you
5 mentioned that made you feel uncomfortable
6 I believe was a -- was it at a rehearsal?
7 Oh, apologies, it was a scene in the
8 kitchen; is that right?

9 A. Yes.

10 Q. And why did that scene make you
11 feel uncomfortable?

12 MR. MICHELMAN: Objection.

13 Q. Let me rephrase.

14 You mentioned that there was an
15 incident in which Mr. Baldoni gave you a
16 note about licking cookie dough off of your
17 co-star's finger and looking up at him; is
18 that right?

19 MR. MICHELMAN: Objection.

20 MR. SCHUSTER: Objection.

21 A. No, it was a spoon in which he
22 was feeding me the cookie dough, but yes,
23 it was a note to lick it and look up at my
24 co-star in a manner that I immediately kind
25 of associated with something that had a

1 FERRER - CONFIDENTIAL

2 sexual undertone, yeah.

3 Q. What did you associate it with?

4 MR. MICHELMAN: Objection.

5 Q. I will rephrase.

6 MR. SCHUSTER: Objection.

7 Q. The note about licking cookie
8 dough off a spoon and looking up at your
9 co-star that Mr. Baldoni gave you, is it
10 correct that you were uncomfortable with
11 that?

12 MR. SCHUSTER: Objection.

13 A. It is not that I wasn't
14 comfortable with that, but I found that to
15 be inappropriate.

16 Q. Why?

17 A. It didn't make sense to me in
18 the scene that we were filming that my
19 character would do that kind of thing given
20 that she was 16 and in high school.

21 Q. You mentioned that you
22 associated that note with something that
23 had a sexual undertone, right?

24 A. Yes.

25 Q. What is the sexual -- what is

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2 addition to being one of the lead actors
3 and the director, Mr. Baldoni was also a
4 co-chairman of Wayfarer Studios?

5 A. I think so, yes.

6 Q. And did you have any concerns
7 about Mr. Baldoni acting as an actor,
8 director, and co-chairman of the studio
9 before joining the film?

10 A. No.

11 Q. And looking back, do you have
12 any concerns about him acting in those
13 three roles simultaneously?

14 A. I don't have concerns. I mean,
15 given the context of everything that has
16 happened now, it is kind of hard not to
17 look at it with some sort of bias of, yeah,
18 it is hard to not look at it biased now,
19 but I think it's a lot of power in a
20 project.

21 Q. Did you also mention that Alex
22 shared with you when he met Mr. Baldoni he
23 commented something to the effect of "I
24 really want you to get to know Isabel" and
25 then winked at him?

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2 A. Yeah, it was after the first
3 day Alex and I met, and after -- it was the
4 first day on the set in the location in New
5 Jersey when I had just been driven out. I
6 was introduced to Alex, Alex and I met, and
7 then, this is according to Alex a couple of
8 months later, when there was a moment when
9 I was away from both of them and we were
10 getting ready to go to Jersey City again,
11 or not again, for the first time, from in
12 New Jersey, Justin pulled Alex aside and
13 said that he wanted Alex to get to know me
14 really well, and yes, winked at him.

15 Q. And you were uncomfortable
16 learning about that interaction?

17 A. Yes.

18 Q. Why is that?

19 A. Because I had just met Alex and
20 that was my director and to insinuate
21 something of that kind of manner I found to
22 be inappropriate.

23 Q. Did you feel that comment from
24 Mr. Baldoni that Alex should get to know
25 you and then winking was sexualizing you?

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2 MR. SCHUSTER: Objection.

3 A. Yes.

4 Q. I'm going to turn your
5 attention to Exhibit 15. Oh, no, sorry,
6 the last exhibit we looked at, Exhibit 14.

7 A. Okay. We are looking at the
8 last one?

9 Q. Yes. And this is a document
10 stamped IF_00001 that counsel for the
11 Wayfarer parties asked you about earlier.
12 Do you recall reviewing this document?

13 A. Yes.

14 Q. And in the first paragraph, the
15 first blue paragraph on the page, you were
16 reflecting to Mr. Baldoni "I couldn't have
17 asked for a more welcoming environment."

18 Do you see that?

19 A. Yes.

20 Q. And at the time that you wrote
21 this, was that an accurate representation
22 of how you felt about the workplace?

23 A. Yes, because I think two things
24 can be true at the same time, so I think I
25 can feel welcome in a place and people can

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2 still say things that are inappropriate, so
3 yeah.

4 Q. Looking back, do you believe
5 that the workplace on set was welcoming?

6 MR. SCHUSTER: Objection.

7 A. Overall, from everybody that
8 was on the set, because there were a lot of
9 people, yeah. I think that the things that
10 he said to me definitely made it less
11 welcoming, but, again, at the time it was
12 my first film and I think I was just really
13 happy to be there, so it is hard to
14 differentiate when that's your experience.

15 Q. Do you feel like as a
16 first-time actor on a set who hadn't
17 received any training about harassment or a
18 safe work environment you were in a
19 position to understand whether his
20 appropriate was behavior in the context of
21 the workplace?

22 MR. MICHELMAN: Objection.

23 A. Can you repeat the question?

24 Q. Sorry, yes. I can rephrase it.
25 You wrote here "You created

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2 such a comfortable and safe space." As you
3 sit here today, do you feel that
4 Mr. Baldoni created a comfortable and safe
5 space for you on set?

6 MR. SCHUSTER: Objection.

7 A. I think he created a space
8 where I could -- a safe and comfortable
9 space in the sense of my art and in the
10 sense of the character that I was building,
11 I felt safe and comfortable enough to
12 explore the themes that I had to explore,
13 which were very intense.

14 I think on a personal level,
15 relationship-wise, I wouldn't necessarily
16 call it comfortable. But I think what I
17 was trying to inference or reference in
18 this text was how I felt creatively and as
19 an actor.

20 Q. So you felt safe in your
21 ability to perform as an actor?

22 A. Yes.

23 MR. SCHUSTER: Objection.

24 Q. But not necessarily safe on a
25 more personal level given his comments --

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2 MR. SCHUSTER: Objection.

3 Q. -- that you deemed to be
4 inappropriate?

5 A. I think I felt safe, but I
6 think that even if I felt safe, what he
7 said wasn't appropriate in the way that if
8 somebody were -- if I was crossing the
9 street and somebody whistled at me, I may
10 feel like I'm safe from them, but I still
11 think what they do is inappropriate.

12 Q. Fair enough. You can set that
13 exhibit aside.

14 If you can reach for Exhibit
15 13.

16 MR. MICHELMAN: Which one?

17 MR. SCHUSTER: The EPK.

18 MS. ROESER: Correct.

19 Q. If you turn to page 9 of that
20 exhibit. You gave this interview reflected
21 in Exhibit 13 in June 2023, correct?

22 A. Yes.

23 Q. At that point how many days had
24 you personally been on set?

25 A. I don't remember.

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2 Q. Did you want to appear in press
3 and promotion with Mr. Baldoni?

4 A. I didn't really mind. Prior to
5 hearing the other words that were expressed
6 about him, I was happy to do anything at
7 that point.

8 Q. And once you learned about the
9 experiences that other people had had with
10 Mr. Baldoni on set, did you want to appear
11 in press and promotion with him?

12 A. Not particularly.

13 MR. SCHUSTER: Objection.

14 Q. Why not?

15 A. If a group of people are saying
16 pretty negative things about a person that
17 kind of validate the situations that I also
18 experienced on set that I thought were
19 inappropriate, it didn't really make me
20 excited to work with him again.

21 Q. Did hearing that Ms. Lively or
22 Ms. Slate had uncomfortable experiences on
23 set impact how you felt about comments that
24 were made to you or about you by
25 Mr. Baldoni?

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2 A. Yes.

3 Q. How?

4 A. It validated why I thought they
5 were inappropriate.

6 Q. And is that because other
7 people were feeling the same way?

8 MR. SCHUSTER: Objection.

9 A. Yes.

10 Q. Do you believe that -- or was
11 it your impression that Ms. Lively
12 genuinely felt uncomfortable with
13 Mr. Baldoni's conduct towards her?

14 MR. SCHUSTER: Objection.

15 MR. MICHELMAN: Can you read
16 that back for me or restate it?

17 MS. ROESER: Yeah.

18 Q. It was, was it your impression
19 that Ms. Lively generally felt
20 uncomfortable with Mr. Baldoni's conduct
21 towards her?

22 MR. SCHUSTER: I renew my
23 objection.

24 A. Yes.

25 Q. Was it also your impression

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2 that Ms. Slate genuinely felt uncomfortable
3 with Mr. Baldoni's conduct towards her?

4 MR. SCHUSTER: Objection.

5 A. Yes.

6 Q. Was it also your impression
7 that Ms. Hoover genuinely felt
8 uncomfortable with Mr. Baldoni's conduct?

9 MR. SCHUSTER: Objection.

10 A. Yes.

11 Q. Did Ms. Hoover discuss with you
12 a dinner that she had with Mr. Baldoni and
13 Mr. Heath around the May 2024 timeframe?

14 A. Yes.

15 Q. What did she tell you about
16 that dinner?

17 A. She told me it was with her
18 friend Tarryn Fisher and that it felt like
19 to her -- it felt to her that Justin and
20 Jamey were trying to persuade her to not
21 like Blake or that they wanted her to have
22 a certain image of Blake, that she was not
23 a good person, and I remember it making her
24 feel very -- her expressing that it made
25 her feel uncomfortable and suspicious and

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2 why would they be so adamant on having her
3 not like Blake if they didn't feel like
4 maybe it had something against them.

5 Q. Did Ms. Hoover share with you
6 at that time that Ms. Lively had raised
7 concerns about Mr. Baldoni and Mr. Heath's
8 conduct on set?

9 A. There was like a general
10 understanding that Blake and others in the
11 cast, like the older people in the cast,
12 didn't like him, but there was never any
13 specifics really referenced at that point
14 yet, other than what Colleen had said to me
15 about her own experience.

16 Q. You attended an event called
17 Book Bonanza, right?

18 A. Yes.

19 Q. Where was that?

20 A. In Texas, Fort Worth -- Dallas,
21 Texas, I think.

22 Q. In Texas?

23 A. Texas.

24 Q. Okay, that's good enough. And
25 was that roughly in June/July 2024?

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2 A. In June, yes.

3 Q. What is Book Bonanza?

4 A. It is a festival that I think
5 Colleen had been doing for a long time that
6 is for book fans, and, yeah.

7 Q. Who else attended Book Bonanza
8 from the film?

9 A. Brandon Sklenar, the producer,
10 Alex Saks, was there, Blake, and Colleen
11 and me.

12 Q. Who invited you to attend Book
13 Bonanza?

14 A. Colleen.

15 Q. Mr. Baldoni did not attend Book
16 Bonanza, correct?

17 A. Yes.

18 Q. Do you know -- do you have an
19 understanding of why he did not attend?

20 A. Colleen expressed to me that he
21 was meant to go and then due to the recent
22 light of events that had happened with him,
23 I think the dinner that they had had, it
24 seemed, again, the post-production conflict
25 that was occurring, Colleen didn't feel

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2 comfortable doing the festival with him
3 anymore, and so took him off of that. I
4 don't know if it was her specifically
5 taking him off, but I know that it was
6 meant to be him and then it wasn't and then
7 it was Blake and Brandon, and then I was
8 invited on.

9 Q. Colleen expressed to you
10 something to the effect that she wasn't
11 comfortable with Mr. Baldoni attending Book
12 Bonanza?

13 A. Yes.

14 Q. And did she share with you that
15 she wasn't comfortable with Mr. Baldoni
16 attending Book Bonanza because of the
17 behaviors on set as well as at the dinner
18 that she had been to with him?

19 MR. SCHUSTER: Objection.

20 A. Yes, and just the -- I think
21 the main thing that I remember her having
22 discomfort with is the fact that he had
23 been lying about her religion and her
24 religious faith and telling people that she
25 was of Bahá'í faith when she wasn't. I

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2 think that was the main thing of her
3 discomfort.

4 Q. If you could turn to Exhibit 3
5 in front of you. I'm looking at the page
6 stamped IF_18. I believe this is the chain
7 between -- a text chain between you and two
8 friends, right?

9 A. Yes.

10 Q. At the bottom of page -- of the
11 page stamped IF_18 you write "I know now
12 that I will be doing a press event in
13 Dallas with Colleen in Justin's place.
14 Colleen disinvited him."

15 Do you see that?

16 A. Yes.

17 Q. And does that refresh your
18 recollection that Colleen disinvited Justin
19 from attending Book Bonanza?

20 A. That was a bit of an
21 assumption. I can't say for sure, but from
22 my recollection, I do think she definitely
23 had a say in whether or not he was there.

24 Q. Okay. Are you aware of anyone
25 other than Ms. Hoover uninverting

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2 Mr. Baldoni from Book Bonanza?

3 A. No.

4 Q. There was a cut of the film
5 screened at Book Bonanza, right?

6 A. Yes.

7 Q. Are you aware if the cut that
8 was screened was Blake's cut or Justin's
9 cut?

10 A. Blake's cut.

11 Q. And did you have an
12 understanding that Ms. Hoover supported
13 Blake's cut of the film?

14 A. Yes.

15 Q. What was the fan reaction to
16 the cut at Book Bonanza?

17 MR. SCHUSTER: Objection.

18 A. Very positive.

19 Q. Standing ovation?

20 MR. SCHUSTER: Objection.

21 A. Yes.

22 Q. You were at Book Bonanza,
23 correct?

24 A. Yes.

25 Q. You were sitting in the

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2 audience?

3 A. Yes.

4 Q. You watched -- did you watch
5 the screening of the film --

6 A. Yes.

7 Q. -- at Book Bonanza?

8 And what did you -- how did you
9 observe the fans to react in that moment?

10 A. It was really beautiful. It
11 was a really wonderful experience, very
12 emotional, overall extremely positive.

13 Q. In connection with promoting
14 the film, you were instructed not to focus
15 on domestic violence; is that right?

16 A. Yes.

17 Q. And you attended some
18 promotional events that were floral-based;
19 is that right? Or are you aware of
20 Wayfarer hosting floral-based events in
21 connection with the film?

22 MR. SCHUSTER: Objection.

23 A. I think so, yes.

24 Q. Are you aware, for example, of
25 Wayfarer hosting floral pop-ups?

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2 A. Yes.

3 Q. In connection with the film?

4 A. I recall that, yes.

5 Q. Are you aware if Mr. Baldoni
6 attended any of those floral-themed events
7 in connection with the film?

8 A. I'm not sure.

9 Q. Did you understand whether
10 Wayfarer had helped develop the plan that
11 the film be marketed -- about how the film
12 be marketed?

13 A. I found out after the fact,
14 like after the movie came out. I didn't
15 know while promo was happening who was
16 controlling what.

17 Q. Who do you recall communicating
18 to you, if anyone, how you were to market
19 the film?

20 A. I believe it was through Sony.
21 I don't really recall, to be honest. I
22 just remember showing up.

23 Q. You testified earlier something
24 to the effect that in the August 2024
25 timeframe you came to a conclusion that

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2 Mr. Baldoni, something about an ingenuine
3 narrative. Do you remember that?

4 A. Yes.

5 Q. What did you mean when you said
6 "ingenuine narrative"?

7 A. This is regarding --

8 Q. I believe it was in connection
9 with the text, "the best con artist I have
10 ever witnessed."

11 A. Yes. I believe that references
12 the fact that he was doing press for -- in
13 support of domestic violence victims, and
14 it felt ingenuine because we were
15 instructed from what I was informed by his
16 production company to not speak on domestic
17 violence and then he went out of his way
18 and did his own press run in the United
19 States where he did only speak on domestic
20 violence, and then when the rest of the
21 cast, mainly the women, got cyberbullied
22 online for it, he didn't do anything to
23 stop it or to tell people that that was
24 inappropriate and that they shouldn't
25 cyberbully people. So that was the part

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2 that felt ingenuine.

3 Q. Fair to say that you received
4 some amount of online hate for not focusing
5 on domestic violence in connection with
6 promoting the film?

7 MR. SCHUSTER: Objection.

8 A. Yes.

9 Q. And fair to say that Ms. Lively
10 also received some amount of online hate
11 for the manner in which she promoted the
12 film?

13 MR. SCHUSTER: Objection.

14 A. Yes.

15 Q. Without focusing on domestic
16 violence?

17 A. Yes.

18 Q. And you were instructed, in
19 fact, not to focus on domestic violence in
20 promoting the film?

21 MR. SCHUSTER: Objection.

22 A. Yes.

23 Q. Did Wayfarer ever make some
24 sort of -- any sort of public statement to
25 your knowledge acknowledging that they had

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2 instructed you or other cast members not to
3 focus on domestic violence in connection
4 with promoting the film?

5 MR. SCHUSTER: Objection.

6 A. They never did.

7 Q. Are you aware of Wayfarer or
8 Mr. Baldoni making any statement
9 acknowledging the bullying or negative
10 press that you were experiencing online?

11 A. No.

12 Q. Are you aware of Wayfarer or
13 Mr. Baldoni making any press statement or
14 acknowledgment of the bullying or negative
15 press that other cast members were
16 experiencing online?

17 MR. SCHUSTER: Objection.

18 A. No.

19 Q. Around the August 2024
20 timeframe, did you notice -- you noticed an
21 upswell of negativity about Ms. Lively
22 online?

23 A. Yes.

24 Q. Attacks that she was a bully or
25 a mean girl, for example?

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2 MR. SCHUSTER: Objection.

3 A. Working in what sense?

4 Q. How would you -- did you find
5 her to be supportive of you as a co-star,
6 for example?

7 A. Yes.

8 Q. And do you recall Ms. Lively
9 advocating for you to get a presenting
10 credit in the film?

11 A. Uh-huh, yes.

12 Q. Do you believe that your
13 relationship with Ms. Lively or
14 Mr. Reynolds has biased your testimony
15 today in any way?

16 MR. SCHUSTER: Objection.

17 A. No.

18 Q. Going back to certain of the
19 comments that Mr. Baldoni made during
20 filming, were you and Alex dating at the
21 time Mr. Baldoni inquired whether you were
22 single?

23 A. No.

24 Q. Did you interpret Mr. Baldoni's
25 comments to Alex to suggest that he should

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2 pursue you romantically or sexually?

3 A. Yes.

4 Q. Did you feel that it was
5 appropriate for your boss to encourage your
6 co-star to pursue you romantically or
7 sexually?

8 MR. SCHUSTER: Objection.

9 A. No.

10 MS. ROESER: Nothing further.

11 MR. SCHUSTER: That was five,
12 that was very fair. Ms. Ferrer, I just
13 have a few and then we are going to get
14 you out of here.

15 THE WITNESS: Sounds good.

16 EXAMINATION BY MR. SCHUSTER:

17 Q. When Mr. Baldoni made the
18 comment of --

19 MR. MICHELMAN: Do you mind
20 saying it again? I couldn't hear you.

21 MR. SCHUSTER: No problem.

22 Q. When Mr. Baldoni made the
23 comment after the intimate scene between
24 you and Alex and used the words "that was
25 hot," what were you wearing?