

Exhibit 14

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 - - - - - - - - - - - - - - x

4 BLAKE LIVELY,

5 Plaintiff,

6 v.

7 WAYFARER STUDIOS LLC, a Civ. Action No.

Delaware Limited

8 Liability Company, 1:24-cv-10049-LJL

JUSTIN BALDONI, an

9 individual, JAMEY HEATH, (Consolidated for

an individual, STEVE

10 SAROWITZ, an individual, pretrial purposes with

IT ENDS WITH US MOVIE

11 LLC, a California 1:25-cv-00449-LJL)

Limited Liability

12 Company, MELISSA NATHAN, Rel. 1:25-cv-00779-LJL

an individual, THE

13 AGENCY GROUP PR LLC, a

Delaware Limited

14 Liability Company,

JENNIFER ABEL, an

15 individual, JED WALLACE,

an individual, and

16 STREET RELATIONS INC., a

California Corporation

17 Defendants.

18 - - - - - - - - - - - - - - x

19 Videotaped Deposition of ELIZABETH TALBOT

20 New York, New York

21 Thursday, August 21st, 2025

22 9:31 A.M.

23 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

24 Pages: 1 - 209

25 Reported Stenographically By: Anita M. Trombetta,
RMR, CRR, California CSR No. 14647

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

23

1	Are you familiar with these two documents?	09:46:57
2	ATTORNEY HAGGERTY: Have you had a chance	09:46:59
3	to review them?	09:46:59
4	A Can I read them?	09:47:00
5	Q Absolutely. Let me know when you're	09:47:01
6	finished.	09:47:03
7	A Thank you.	09:47:03
8	(Document review.)	09:47:30
9	ATTORNEY ROESER: Counsel, while the	09:51:38
10	witness reads the exhibit, can we also put a	09:51:39
11	stipulation on the record that all objections	09:51:42
12	except as to the form of the question will be	09:51:44
13	reserved for the time of trial, pursuant to	09:51:45
14	Rule 32 (d)?	09:51:48
15	ATTORNEY FRITZ: That's fine.	09:51:50
16	ATTORNEY ROESER: Great.	09:51:55
17	Q You had a chance to review both documents?	09:52:51
18	A Correct.	09:53:03
19	Q Okay. Let's start with 38, which is the	09:53:03
20	Standards and Protocols For the Use of Intimacy	09:53:06
21	Coordinators.	09:53:10
22	Are you familiar with this document?	09:53:11
23	A Yes.	09:53:12
24	Q Have you seen it before?	09:53:12
25	A Yes.	09:53:13

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

24

1 Q Have you read it before today? 09:53:16

2 A Yes. 09:53:20

3 Q Does SAG require the use of intimacy 09:53:21

4 coordinators, or is it suggested or recommended, 09:53:24

5 if you know? 09:53:26

6 A Prior to the agreements, I think in 09:53:29

7 November 2023, it was a recommendation. Post 09:53:33

8 that, it is best efforts. 09:53:36

9 Q Which agreement are you referring to? 09:53:39

10 A It's the agreement that was sorted out in 09:53:42

11 November 2023, post the writers' strike and the 09:53:46

12 actors' strike. 09:53:51

13 Q When -- prior to November 2023, what was 09:54:00

14 your understanding of when it was recommended that 09:54:02

15 an intimacy coordinator be on set? 09:54:04

16 A For scenes of simulated sex and nudity. 09:54:06

17 Q And do you know if SAG defines "nudity"? 09:54:11

18 A So "nudity" for us is defined as anything 09:54:20

19 that would be seen underneath a bikini for a 09:54:27

20 female and underneath a pair of Speedos for a 09:54:33

21 male. 09:54:39

22 Q And prior to November of 2023, was an 09:54:42

23 intimacy coordinator required to be on set for 09:54:46

24 kissing scenes? 09:54:49

25 A No. 09:54:50

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Transcript of Elizabeth Talbot

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1 the more time you have to discuss. 10:58:09

2 And I believe I had a conversation with 10:58:14

3 Justin's assistant, who added in Blake's 10:58:19

4 assistant, and that's how we navigated the time 10:58:23

5 for the call. 10:58:28

6 Q Okay. So at some point in early May you 10:58:28

7 had a phone call with Blake Lively? 10:58:33

8 A Correct. 10:58:35

9 Q Okay. Was anyone else on the call? 10:58:36

10 A Yes. 10:58:37

11 Q Who was that? 10:58:38

12 A Lindsey. 10:58:39

13 Q Who is that? 10:58:39

14 A A lawyer for Blake. 10:58:40

15 Q Do you know her last name? 10:58:42

16 A Strasberg, I believe, or something to that 10:58:44

17 effect. 10:58:51

18 Q And do you recall what was discussed 10:58:55

19 during that call? 10:58:56

20 A Yes. I started on the phone with Lindsey. 10:58:57

21 We had a conversation because I think she 10:59:02

22 recognized me and I potentially recognized her 10:59:08

23 from another project, either we had worked with 10:59:10

24 the same actor or -- there was some familiarity 10:59:15

25 between us. 10:59:18

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1	So we were on the call together first and	10:59:19
2	then Blake joined. We discussed Wrexham Football	10:59:22
3	Club because I grew up in Wales.	10:59:33
4	And then we started to discuss what my	10:59:37
5	role was because she had not worked with an	10:59:40
6	intimacy coordinator before.	10:59:44
7	She described some previous scenes in her	10:59:46
8	career where she had felt unsafe. And I then	10:59:51
9	asked.	11:00:01
10	ATTORNEY HERMAN: Comfort level, her	11:00:02
11	boundaries, and said that I was going to send her	11:00:04
12	Justin's vision and the -- ask for those scenes	11:00:14
13	that would be within her consent and boundaries.	11:00:20
14	And that I was going to remove anything that was	11:00:24
15	not, and that I was going to provide her with	11:00:27
16	nudity rider language. And to contact me if she	11:00:29
17	needed or wanted anything else.	11:00:39
18	Q Did she ever contact you to say she needed	11:00:40
19	or wanted anything else?	11:00:44
20	A No.	11:00:45
21	Q When she referred to feeling unsafe in	11:00:46
22	scenes on other projects or prior projects, did	11:00:50
23	she specify what those projects were?	11:00:53
24	A No.	11:00:55
25	Q Did she specify why she felt unsafe?	11:00:55

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1 A Not that I recall in specifics, but I
2 would say that that is a common refrain from many
3 actors, that previously they have had negative
4 experiences with these scenes.

5 Q Did she tell you what her comfort level
6 was with respect to intimate scenes?

7 A Correct. We talked about what was -- what
8 she was happy to show, what she did not want to
9 show, the extent of touching during these scenes,
10 specifically in regards to Justin's request here
11 in the email.

12 Q And what did she say her comfort level was
13 in terms of what she would show and would not
14 show?

15 A We talked about -- I believe it's in the
16 nudity rider language. So I believe it is no
17 nudity that would be seen underneath a bikini.

18 And in terms of simulated sex, there was
19 to be no simulated oral sex, either implied or
20 actual, and that there was to be no touching of
21 breast or groin area.

22 Q Okay. And what about orgasms?

23 A That was not discussed because -- well, I
24 don't recall discussing that because I believe
25 that that was not in the request at this point.

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 Q Justin didn't request that? 11:02:40

2 A Not in -- I would have to refer to this, 11:02:43

3 but it is not something that I -- I brought up 11:02:48

4 with her because I believed it to be off the table 11:02:51

5 at that time. 11:02:54

6 Q Okay. 11:02:54

7 ATTORNEY FRITZ: Let's take a look at 11:03:06

8 12 -- 10. 11:03:08

9 ATTORNEY BIENER: 10 or 12? 11:03:12

10 ATTORNEY FRITZ: 12. 11:03:14

11 (Talbot Exhibit 12, marked for 11:03:14

12 identification.) 11:03:14

13 BY ATTORNEY FRITZ: 11:03:44

14 Q Before we get to 12, I'm just going to ask 11:03:44

15 you some questions that don't pertain to this 11:03:47

16 document. 11:03:49

17 A Okay. 11:03:51

18 Q Prior to meeting with -- or speaking with 11:03:52

19 Blake in -- on April 5th, did you request to meet 11:03:54

20 with her or speak to her any earlier than that, if 11:03:57

21 you recall? 11:04:00

22 A Earlier than? 11:04:00

23 Q May 5th? 11:04:02

24 A Yes. 11:04:03

25 Q Do you recall when you first sought to 11:04:03

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1 ATTORNEY HAGGERTY: Just to make sure to 11:15:56
2 let Mr. Fritz finish his question -- 11:15:58
3 THE WITNESS: Sorry. 11:16:00
4 ATTORNEY HAGGERTY: -- before you answer. 11:16:00
5 Q Is the birth scene one of these five here? 11:16:04
6 A No, it is not. 11:16:07
7 Q Have you seen the movie? 11:16:09
8 A Yes. 11:16:14
9 Q Okay. 11:16:15
10 A Oh, this movie? 11:16:17
11 Q This movie, It Ends With Us? 11:16:19
12 A Not in its entirety; pieces of it. 11:16:19
13 Q Okay. Have you seen the birthing scene? 11:16:21
14 A I have seen the birthing scene. 11:16:24
15 Q Do you recall any nudity in that? 11:16:26
16 ATTORNEY ROESER: Objection. 11:16:28
17 Q If you recall? 11:16:30
18 A I don't recall any nudity. There was a 11:16:32
19 high hip line that may have been called profile 11:16:38
20 nudity to an extent, and that some actors would 11:16:45
21 require or request a nudity rider for. 11:16:51
22 Q Do you know if Blake requested that? 11:16:54
23 A No, this was not on our discussion. 11:16:57
24 ATTORNEY FRITZ: Let's take a look at 11 11:17:21
25 quickly. 11:17:23

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1 know -- 11:54:43
2 Q Okay. 11:54:43
3 A -- what requests were made not in my 11:54:44
4 presence. 11:54:46
5 ATTORNEY ROESER: Belated objection to 11:54:49
6 that question as form and foundation. 11:54:51
7 Q But to your knowledge, are you aware of 11:54:52
8 any? Like did you see anything and say, hey, we 11:54:54
9 should have this safeguard in place and it wasn't 11:54:58
10 there? 11:55:00
11 ATTORNEY HAGGERTY: Objection to the -- 11:55:04
12 I'm sorry. Objection to the form. 11:55:05
13 ATTORNEY FRITZ: Okay. 11:55:08
14 A The birthing scene could potentially have 11:55:08
15 had a profile nudity rider below the waist for 11:55:18
16 profile nudity below the waist. Again, that's 11:55:24
17 from a very quick viewing of what ended up on 11:55:27
18 film. And I cannot say with any concrete 11:55:34
19 evidence, not being there, of what else needed 11:55:38
20 one. 11:55:42
21 Q Okay. Was your presence or involvement 11:55:42
22 for kissing scenes required? 11:55:57
23 ATTORNEY ROESER: Objection. Form, 11:56:02
24 foundation. 11:56:03
25 A Required by who? 11:56:04

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1 A That's -- sometimes, again, with the actor
2 who was in a tube top and sweatpants looking in
3 the mirror, no, they're fully clothed at that
4 point.

5 There may be times where an actor is
6 wearing a stick-on bra, for example, where you may
7 have a naked back, and we might close the set for
8 an actor's comfort at that point.

Again, this is a very nuanced job with everyone having a very different experience and comfort level, and various factors play into this role.

13 The only real hard and fast rules that we
14 have are the nudity rider and the simulated -- as
15 in the nudity rider that includes the simulated
16 sex and nudity.

17 Q Okay. And if you could also turn to the
18 exhibit marked 39 by defendants' counsel, which is
19 the Quick Guide for Scenes Involving Nudity and
20 Simulated Sex.

21 A Sorry. Hang on.

22 Q And I'm looking at page 1. Just let me
23 know when you're ready with that.

24 A Yeah.

25 Q So page 1 -- and there's four bullet

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1 points there. 13:20:04

2 Do you see those? 13:20:05

3 A Yes. 13:20:05

4 Q And one of them is a requirement for 13:20:06

5 appropriate notice of nudity in simulated sex? 13:20:09

6 A Mm-hmm. 13:20:13

7 Q Okay. And that applies for a role, and I 13:20:14

8 believe that you mentioned earlier that it is the 13:20:18

9 responsibility of the director to notify an 13:20:20

10 intimacy coordinator as soon as they envision a 13:20:24

11 scene that would include either simulated sex or 13:20:27

12 nudity? 13:20:29

13 A Yes, if it's a new one that they are 13:20:29

14 introducing or a new element of the scene that 13:20:31

15 they are introducing, yes. 13:20:34

16 Q Also on that page at the third bullet 13:20:35

17 point, there's a requirement for riders that 13:20:42

18 outline the parameters of nudity and simulated 13:20:46

19 sex, correct? 13:20:48

20 A Sorry, correct. 13:20:50

21 Q And if you turn to page 3, please. It 13:20:51

22 states, "A performer's performance or depiction in 13:20:59

23 a scene requiring nudity or simulated sex acts is 13:21:04

24 conditioned on their prior written consent which 13:21:09

25 should take the form of a rider attached to their 13:21:11

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1 contract."13:21:15

2 Do you see that?13:21:15

3 A Yes, correct.13:21:15

4 Q And this does say performance or depiction13:21:17

5 in a scene requiring nudity, correct?13:21:20

6 A Depiction of the simulated sex acts.13:21:23

7 Q It says here, "A performer's performance13:21:27

8 or depiction in a scene requiring nudity" --13:21:29

9 A Yes.13:21:33

10 Q -- "or simulated sex," correct?13:21:33

11 A Yes, correct.13:21:37

12 Q You can set that aside.13:21:41

13 Before you signed on to It Ends With Us,13:21:44

14 had you worked with Wayfarer before?13:21:49

15 A With Wayfarer, no.13:21:51

16 Q Had you worked with Mr. Baldoni before?13:21:53

17 A No.13:21:54

18 Q Mr. Heath?13:21:55

19 A No.13:21:57

20 Q Have you worked with him before?13:21:57

21 A Sorry, no.13:21:58

22 Q Was that a no?13:22:00

23 A Correct.13:22:01

24 Q And had you worked with Mr. Sarowitz13:22:02

25 before?13:22:07

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1 a look at the document while we pass them on? 13:23:29

2 THE WITNESS: Sorry. 13:23:45

3 ATTORNEY BIENER: Both of them are 41? 13:23:59

4 ATTORNEY ROESER: Yes, together. 13:24:01

5 BY ATTORNEY ROESER: 13:24:11

6 Q Take a minute to review and let me know 13:24:11

7 whenever you are ready. 13:24:14

8 You don't have to review the whole thing, 13:24:15

9 the whole exhibit, but you may if you would like 13:24:18

10 to. 13:24:21

11 A Okay. 13:24:22

12 (Document review.) 13:24:23

13 ATTORNEY HAGGERTY: Maybe to look through 13:24:29

14 to familiarize yourself with the nature of what it 13:24:31

15 is, not the substantive content of each page, but 13:24:32

16 if counsel's going to ask you about a particular 13:24:36

17 page, you can take time to review the page as -- 13:24:38

18 as we get to it. 13:24:41

19 THE WITNESS: Okay. Okay. 13:24:42

20 (Document review.) 13:24:42

21 A Okay. 13:25:07

22 BY ATTORNEY ROESER: 13:25:09

23 Q So Exhibit 41 is an email. And it's an 13:25:09

24 email from Jill Sacco to you dated March 4th, 13:25:12

25 2023, right? 13:25:15

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1 A Correct. 13:25:17

2 Q And the first line of the email reads, 13:25:17

3 "I've attached a watermarked script for you to 13:25:20

4 read." 13:25:23

5 Do you see that? 13:25:23

6 A Yes. 13:25:23

7 Q And the attachment to the email appears to 13:25:24

8 be a script for It Ends With Us dated March 3rd, 13:25:27

9 2023, correct? 13:25:31

10 A Correct. 13:25:32

11 Q Did you review the script when you 13:25:40

12 received it in March or around that time? 13:25:44

13 A Yes. 13:25:46

14 Q Did you review the entire script or just 13:25:46

15 specific scenes? 13:25:49

16 A When she sent me the script, I read the 13:25:50

17 script, but there were also -- either prior to 13:25:55

18 this or shortly after, there were two scenes that 13:25:59

19 were attached in an email. I don't -- I believe 13:26:06

20 that this was the one with the whole script in it. 13:26:10

21 Q Okay. You can set that exhibit aside for 13:26:13

22 now. 13:26:19

23 A Thank you. Would you like me -- do we 13:26:19

24 still hold on to this? 13:26:22

25 Q Yeah, if you could just keep it maybe in 13:26:24

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1 A Again, clarifying question, what happens 13:39:44
2 here? It's not a suggestion, oh, you should do 13:39:46
3 this. It's a, what is happening here? Is it 13:39:51
4 this? The script is indicating this. Is this 13:39:55
5 your vision? Is this what you're hoping to 13:39:58
6 achieve. 13:40:01

7 Q So the script had indicated potentially 13:40:01
8 simulated oral sex, correct? 13:40:04

9 A Correct. 13:40:06

10 Q And you were asking a clarifying question 13:40:06
11 about whether that would be included and, if so, 13:40:09
12 how? 13:40:12

13 A Correct. Because it -- again, it's a call 13:40:13
14 back to the book, where there is definitely 13:40:16
15 implied oral sex going on, and it's a very similar 13:40:20
16 scene. 13:40:24

17 So, again, a clarifying question as to 13:40:25
18 whether this is the same -- are we trying to 13:40:27
19 recreate that scene even if it's not explained in 13:40:32
20 the script particularly clearly that that's going 13:40:38
21 on. 13:40:42

22 Because again, as I said, that scene in 13:40:43
23 the script didn't make sense as written. The eyes 13:40:45
24 rolling back in the head seemed to suggest orgasm. 13:40:49
25 Is that what we want to see on screen? 13:40:53

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1 A A white production draft, yes. 13:58:55

2 Q And it says here, "Please find attached 13:58:59

3 official clean, white production draft as of 13:59:02

4 April 5th, 2023, for It Ends With Us," correct? 13:59:05

5 A Yes. 13:59:07

6 Q If you turn to the attachment, please. 13:59:08

7 The first page is titled Screenplay for It 13:59:20

8 Ends With Us, and it's the white production draft 13:59:27

9 dated April 5th, 2023, correct? 13:59:29

10 A Correct. 13:59:32

11 Q If you could please turn to page 47. 13:59:35

12 Do you recall, after you signed on to the 13:59:43

13 film, receiving a version of the script that 13:59:45

14 included additional sexual content? 13:59:48

15 A Yes, this is the -- a script I would have 14:00:01

16 received. And again, the changes have been made. 14:00:04

17 Q So I'll just ask my question one more time 14:00:08

18 so we have an answer. 14:00:11

19 A Sorry. 14:00:12

20 Q That's okay. 14:00:13

21 Do you recall, after you signed on to the 14:00:14

22 film, that you received a version of the script 14:00:15

23 that included additional sexual content that was 14:00:18

24 not included in the original version you received? 14:00:20

25 A From 47? 14:00:23

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1 Q Just generally, do you recall -- 14:00:25
2 A Oh. 14:00:26
3 Q -- as you sit here, receiving a version of 14:00:27
4 the script that included additional sexual content 14:00:29
5 that was not included in the original version that 14:00:32
6 you received? 14:00:34
7 A I'd have to check. I don't know if I 14:00:35
8 could categorically say one way or the other 14:00:37
9 without reviewing it. 14:00:42
10 Q If you turn to page 47 now. 14:00:44
11 A Mm-hmm. 14:00:46
12 Q Towards the bottom of the page, there is a 14:00:47
13 bolded heading that says Bedroom. 14:00:51
14 Do you see that? 14:00:53
15 A Mm-hmm. Yes. 14:00:54
16 Q This scene reads, "Where Lily turns, 14:00:55
17 pressing her mouth against his, and then throws 14:01:01
18 him on the bed, on all fours, Lily playfully 14:01:04
19 crawls up his body mounting him, her hand lacing 14:01:09
20 behind his neck as she pulls him up in a seated 14:01:12
21 position, the two now entangled." 14:01:16
22 Do you see that? 14:01:19
23 A Yes. 14:01:19
24 Q If you go to the next paragraph, it 14:01:19
25 reads, "With strong arms in one swoop Ryle plants 14:01:22

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1 have gone through, complaints against other 14:18:14
2 actors, complaints against various members of the 14:18:19
3 casting crew. 14:18:22

4 So I'm -- I'm pretty careful about what to 14:18:26
5 keep on record and what -- what I get rid of. 14:18:28

6 Q Okay. So other than the documents that 14:18:32
7 you provided to your counsel, you don't -- 14:18:33

8 A Correct. 14:18:36

9 Q -- have notes regarding your conversations 14:18:36
10 with Mr. Baldoni or with Ms. Lively? 14:18:38

11 A Correct. 14:18:39

12 Q Do you recall at some point in April of 14:18:41
13 2023, Mr. Heath providing you with a list of 14:18:51
14 scenes in the script that he deemed to involve 14:18:54
15 intimacy? 14:18:56

16 A Yes, I believe AJ provided that. 14:18:56

17 Q Who is AJ? 14:18:59

18 A That is Mr. Baldoni's assistant. 14:19:00

19 Q Is that AJ Marbury? 14:19:05

20 A Yes, I think so. 14:19:08

21 ATTORNEY ROESER: We'll introduce 14:19:17
22 Exhibit 43, which is a document ending in Bates 14:19:20
23 number 2016. 14:19:22

24 (Talbot Exhibit 43, marked for 14:19:22
25 identification.) 14:19:22

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1 BY ATTORNEY ROESER: 14:19:50

2 Q Before I ask you about document 43, 14:19:50

3 actually, one more question about the April 2023 14:19:53

4 script. 14:19:56

5 A Mm-hmm. 14:19:57

6 Q Did you suggest to Mr. Baldoni that he 14:19:57

7 include in the script oral sex? 14:19:59

8 A No. 14:20:03

9 Q Please turn to Exhibit 43, take a minute 14:20:04

10 to read it and let me know when you're ready. 14:20:10

11 (Document review.) 14:20:39

12 Q This is an email from Mr. Heath to you 14:20:39

13 dated May 4th, 2023, correct? 14:20:42

14 A Mm-hmm. 14:20:44

15 Q Mr. Heath had compiled in this email 14:20:45

16 scenes that, as he writes, "have any sort of 14:20:50

17 intimacy," correct? 14:20:53

18 A Any sort, yes. 14:20:54

19 Q This list includes scenes with 14:20:56

20 "undressing," for example, numbers 11 and A42? 14:20:59

21 A Mm-hmm. Yes. 14:21:04

22 Q It includes scene 38, which involves 14:21:06

23 "kissing and grinding," right? 14:21:10

24 A Yes. 14:21:11

25 Q And it includes a number of scenes, 14:21:12

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1 including numbers C42, 63, 74, 79, and 97 that 14:21:16
2 involve "kissing"? 14:21:26
3 A Correct. 14:21:27
4 Q The birth scene is not on this list, 14:21:27
5 correct? 14:21:32
6 A Correct. 14:21:32
7 Q And this list also doesn't include a scene 14:21:33
8 in which Mr. Baldoni and Ms. Lively's characters 14:21:47
9 are dancing, correct? 14:21:50
10 A Correct. 14:21:51
11 Q You can set that exhibit aside. 14:21:52
12 A Thank you. 14:21:55
13 Q Are you familiar with the scene in which 14:21:56
14 Mr. Baldoni and Ms. Lively's characters are 14:22:12
15 depicted dancing? 14:22:14
16 A Only from the media presence surrounding 14:22:16
17 it. 14:22:20
18 Q Okay. And you are familiar with the scene 14:22:21
19 in which Ms. Lively's character gave birth? 14:22:30
20 A Yes, correct. 14:22:32
21 Q And fair to say that you understood that 14:22:34
22 birth scene was not to involve nudity? 14:22:40
23 A Correct. Otherwise there would have been 14:22:43
24 a nudity rider. 14:22:44
25 Q Did you understand whether the birth scene 14:22:46

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1 would involve partial nudity? 14:22:51

2 I believe you mentioned earlier a high -- 14:22:53

3 high hip profile? 14:22:55

4 ATTORNEY HAGGERTY: Objection to the form. 14:22:57

5 Sorry, you can answer. 14:22:59

6 THE WITNESS: Sorry. 14:23:00

7 ATTORNEY ROESER: I'll rephrase. 14:23:02

8 ATTORNEY HAGGERTY: Thank you. 14:23:03

9 Q Did you understand before the birth scene 14:23:04

10 was filmed that it would involve a high hip 14:23:06

11 profile? 14:23:08

12 A No. 14:23:09

13 Q Can you explain what a "high hip profile" 14:23:11

14 means? 14:23:14

15 A Yes. So do you remember I was dividing 14:23:14

16 the body up into four? 14:23:19

17 Q Yes. 14:23:21

18 A Front and rear? 14:23:21

19 So in addition to that, we also 14:23:25

20 occasionally talk about profile nudity. So, for 14:23:27

21 example, above the waist, it may be that you see 14:23:32

22 profile breast, but not nipple. And at that 14:23:36

23 point, that would typically require a nudity rider 14:23:41

24 because we're seeing something that would be 14:23:45

25 outside of a -- a bikini. 14:23:48

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1	padded thong. That is typically what we would	14:25:22
2	give people for a scene of missionary. And what	14:25:25
3	you would see is two people like this	14:25:28
4	(indicating). However, there is a barrier in	14:25:30
5	between them because you have that padded	14:25:33
6	strapless thong on. What you do not have is	14:25:36
7	anything around the waist.	14:25:39
8	Does that make sense?	14:25:42
9	Q Yes.	14:25:43
10	A So if you are not wearing anything around	14:25:44
11	the waist, we don't yet have bikinis that are	14:25:48
12	attached at the front and the back only. That is	14:25:54
13	something that we can use as intimacy coordinators	14:25:58
14	in our world of terminology that we're restricted	14:26:01
15	to by bikinis.	14:26:04
16	Q Mr. Baldoni never shared with you that he	14:26:06
17	intended the birth scene to include profile	14:26:09
18	nudity, right?	14:26:11
19	A My understanding is that she was going to	14:26:12
20	be in a hospital robe.	14:26:14
21	Q So he did not share with you that it might	14:26:17
22	include --	14:26:21
23	(Multiple speakers; reporter	14:26:21
24	clarification.)	14:26:22
25	ATTORNEY HAGGERTY: The question hadn't	14:26:22

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1 yet concluded. I'm sorry. 14:26:22

2 THE WITNESS: I know. Sorry. 14:26:23

3 Q Mr. Baldoni did not share with you that he 14:26:24

4 intended the birth scene to include profile 14:26:27

5 nudity? 14:26:30

6 A Correct. 14:26:30

7 Q You understood that Ms. Lively would be in 14:26:31

8 a hospital gown in the birth scene? 14:26:33

9 A Correct. 14:26:35

10 Q If you understood that the birth scene was 14:26:36

11 going to include profile nudity, would you have 14:26:42

12 discussed the scene with Ms. Lively? 14:26:44

13 A Yes. 14:26:46

14 Q And would you have requested to be there 14:26:47

15 that day? 14:26:50

16 A If it involved a nudity rider, I would 14:26:51

17 have said absolutely I should be there. 14:26:54

18 Q During your phone call with Ms. Lively and 14:26:57

19 her counsel on May 5th, you discussed what kinds 14:27:06

20 of intimacy Ms. Lively would be comfortable with, 14:27:14

21 right? 14:27:17

22 A Correct. 14:27:17

23 Q Did you discuss whether she would be 14:27:18

24 comfortable with open-mouth kissing? 14:27:19

25 A We discussed that there was to be no 14:27:22

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1 tongue during kissing. But that is also something 14:27:26
2 that I -- had been brought up previously with 14:27:30
3 Mr. Baldoni as a question that I had shut down and 14:27:32
4 said there was to be no tongue during kissing. 14:27:35

5 Because that's typically -- we often just 14:27:38
6 don't need it. Unless it is specified in the 14:27:40
7 script that there is, like a lick or something 14:27:44
8 like that, our standard understanding of kissing 14:27:47
9 is that it can be open-mouth, but it can't be with 14:27:52
10 tongue. 14:27:56

11 Q But Ms. Lively shared with you that she 14:27:56
12 was not comfortable with tongue? 14:27:58

13 A Correct. 14:28:00

14 Q Did she also express that she was not 14:28:00
15 comfortable with simulated oral sex? 14:28:02

16 A Correct. I -- I believed that that had 14:28:05
17 been again taken off the table, but I would have 14:28:10
18 confirmed that with her. 14:28:12

19 Q Ms. Lively confirmed that she was not 14:28:13
20 comfortable with simulated or inferred oral sex, 14:28:16
21 correct? 14:28:20

22 A You will see in my email to her that that 14:28:20
23 is crossed out. 14:28:25

24 Q Did you discuss with Ms. Lively and her 14:28:27
25 counsel whether Ms. Lively would be comfortable 14:28:29

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1	(Recess.)	14:33:19
2	THE VIDEOGRAPHER: We are back on the	14:45:11
3	record and the time is 2:45 P.M.	14:45:22
4	ATTORNEY ROESER: We're going to introduce	14:45:30
5	Exhibit 44, which is a document ending in Bates	14:45:31
6	number -- which is a parent email and attachment	14:45:33
7	as one exhibit. I'm starting with Bates number	14:45:39
8	ending in 3313.	14:45:41
9	(Talbot Exhibit 44, marked for	14:45:41
10	identification.)	14:45:41
11	BY ATTORNEY ROESER:	14:46:14
12	Q This is an email from It Ends With Us to	14:46:14
13	you dated March -- sorry, dated May 19th, 2023,	14:46:17
14	correct?	14:46:24
15	A Yes.	14:46:24
16	Q And it attaches a call sheet for day 6 of	14:46:25
17	shooting, for Monday, May 22nd, 2023, correct?	14:46:34
18	A Correct.	14:46:37
19	Q The call sheet includes scene 106?	14:46:38
20	A Correct.	14:46:50
21	Q Which is the birth scene, correct?	14:46:50
22	A Correct.	14:46:52
23	Q Wayfarer did not call you to be on set for	14:46:54
24	that scene, correct?	14:46:58
25	A Correct.	14:46:59

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1 Q The call sheet does not indicate that the 14:47:00
2 set will be closed for purposes of the birth 14:47:08
3 scene, correct? 14:47:14

4 A Correct. So when we do a closed set, we 14:47:15
5 would depict the -- we would specify the scene for 14:47:20
6 which it would be a closed set. 14:47:23

7 Q On a call sheet next to the scene, it 14:47:26
8 would include a box or red letters or something 14:47:31
9 that say "closed set"? 14:47:36

10 A Correct. 14:47:37

11 Q And can you describe for me what a closed 14:47:38
12 set is for purposes of intimacy and nudity? 14:47:40

13 A Correct. So for scenes of simulated sex 14:47:43
14 and nudity, a closed set is some -- where we send 14:47:46
15 out closed-set protocols, which list exactly what 14:47:51
16 the procedure is for the day. 14:47:58

17 You would potentially have a copy of 14:48:00
18 those -- okay. 14:48:11

19 I wouldn't be able to tell you word for 14:48:11
20 word what's on the closed-set protocols, but -- 14:48:14

21 Q Generally? 14:48:17

22 A -- generally. 14:48:18

23 Q And generally speaking, closed sets for 14:48:18
24 purposes of intimacy and nudity limit who may be 14:48:21
25 able to be on set during filming of an intimate or 14:48:27

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1 a nude scene, correct? 14:48:31

2 A For scenes of simulated sex and nudity, 14:48:32

3 yes, there would be closed-set protocols that 14:48:35

4 would specify who needs to be in the room. 14:48:41

5 There is often an addendum that I put on 14:48:44

6 to my closed-set protocols because sometimes you 14:48:48

7 are working with animals and you may need an 14:48:56

8 animal handler and that might not be a typical 14:49:00

9 person that you would put on a closed-set protocol 14:49:04

10 list. 14:49:08

11 Q Interesting. While we locate the 14:49:10

12 closed-set protocols, is it production's 14:49:13

13 responsibility to identify when the set will be 14:49:22

14 closed for purposes of intimacy or nudity? 14:49:25

15 A It's often a collaboration. So, for 14:49:28

16 example, I can suggest when scenes might be 14:49:33

17 closed, depending on what the content is and what 14:49:40

18 we're seeing and what we're not seeing. But 14:49:43

19 obviously any scene with simulated sex or nudity 14:49:48

20 is automatically a closed set. 14:49:51

21 ATTORNEY ROESER: Okay. We'll introduce 14:49:57

22 Exhibit 45. 14:50:00

23 (Talbot Exhibit 45, marked for 14:50:00

24 identification.) 14:50:00

25 ATTORNEY ROESER: Which is a document 14:50:19

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1 ending in Bates 1097. 14:50:19

2 ATTORNEY HERMAN: And 1098 is the 14:50:23

3 attachment. 14:50:27

4 BY ATTORNEY ROESER: 14:50:49

5 Q This is an email dated June 21, 2023, from 14:50:49

6 It Ends With Us to you, correct? 14:50:54

7 A Correct. 14:51:00

8 Q And this email includes closed-set 14:51:00

9 protocols, right? 14:51:05

10 A Correct. 14:51:05

11 Q If you look at the attachment, there is a 14:51:06

12 document entitled Closed-Set Protocols. 14:51:12

13 Do you see that? 14:51:14

14 A Correct. 14:51:15

15 Q It has your name in the corner, Lizzy -- 14:51:15

16 Elizabeth Talbot. 14:51:18

17 Is this closed-set protocol a document 14:51:20

18 that you created? 14:51:25

19 A Yes, this is based on the original HBO 14:51:25

20 closed-set protocols. They have -- this is not a 14:51:32

21 document I would send today. 14:51:35

22 My document that I send out now is longer 14:51:36

23 than this and a bit more restrictive, but again, 14:51:39

24 that's because over time, as we've done more and 14:51:46

25 more of these scenes, we're encountering slightly 14:51:48

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1 different things because productions vary so much, 14:51:51
2 that we would add things into this that 14:51:53
3 potentially may not have been there in 2023. 14:51:56

4 Q Protocols for a closed set have changed 14:51:59
5 over time? 14:52:03

6 A Yes, I would say that -- I mean, this is 14:52:03
7 accurate for 2023. But if you showed this to 14:52:07
8 someone in 2025, I would expect to see more things 14:52:10
9 on here. 14:52:15

10 Q The protocols for a closed set include all 14:52:16
11 outside monitors being turned off, correct? 14:52:22

12 A Correct. 14:52:24

13 Q And it also includes that the director and 14:52:25
14 DEP monitor be covered by a tent or with flags, 14:52:32
15 correct? 14:52:36

16 A Correct. 14:52:38

17 Q The protocols also include that a list of 14:52:39
18 who will be at the monitor be communicated to the 14:52:54
19 actors before the scene, correct? 14:52:56

20 A Correct. 14:52:58

21 Q In other words, actors involved in 14:52:59
22 intimate or nudity scenes should understand who is 14:53:02
23 on set while they're performing their scenes? 14:53:05

24 A Yes. So that would be communicated to 14:53:09
25 actors. And it may even be something like, just 14:53:12

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1 so you know, people on the monitors are going to 14:53:17
2 be X, Y, and Z. 14:53:21

3 And I've had actors who have opinions 14:53:25
4 about who those people are, whether they want 14:53:28
5 additional people, because sometimes they want 14:53:32
6 additional people, whether that's reps that are 14:53:34
7 visiting for the day, whether that's -- you'll see 14:53:36
8 here that additional support personnel, so they 14:53:42
9 may also be on the list. 14:53:45

10 Q Additional support personnel for the 14:53:47
11 actors involved in the scenes? 14:53:48

12 A Correct. 14:53:50

13 Q In the event of a closed set, again for 14:53:57
14 intimate or nudity scenes, there would also be 14:53:59
15 members of the costume department on set, for 14:54:02
16 example, to ensure that actors were covered during 14:54:05
17 breaks? 14:54:08

18 A Correct. 14:54:08

19 Q And non-essential personnel would be asked 14:54:11
20 to leave set when there is a closed set due to 14:54:16
21 intimacy or nudity? 14:54:19

22 A Correct. 14:54:20

23 Q In the event of a closed set, access to -- 14:54:26
24 access on phones or iPads to what's being shot 14:54:31
25 would also be limited, correct? 14:54:34

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1 A Correct. And that's something that would
2 be an additional insert here.

3 Q And would it also be appropriate for a
4 closed set to collect cameras or recording devices
5 to ensure that no one is recording the scene
6 without the actors' consent?

7 A Collection doesn't always take place.

8 It's more about putting them away. They are not
9 to be seen.

10 I've worked on certain shows, where there
11 is a specific requirement to collect and put aside
12 mobile phones. Or another option that we often
13 use is to hand out stickers because, again, people
14 use phones to communicate so much, whether that's,
15 you know, if there's lightning issues -- any
16 emergency, we would have some form of
17 communication device. And so one way to manage
18 that is to put stickers on the cameras.

19 Q You would hand out stickers?

20 A To cover the camera of the phone, so that
21 you can still use your phone, but again, you
22 wouldn't be able to have any ability to record.

23 That's -- again, different productions
24 work in different ways. And if you're in a
25 location that may be, you know, have more safety

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1	(Document review.)	14:58:12
2	A Ready.	14:58:12
3	Q This is a May 22nd, 2023, email that you	14:58:18
4	received from It Ends With Us, correct?	14:58:20
5	A Correct.	14:58:23
6	Q This email attaches a call sheet as well	14:58:25
7	as script pages for day 7 of shooting on May 23rd,	14:58:28
8	2023, correct?	14:58:33
9	A Correct.	14:58:37
10	Q The call sheet indicates that a dance	14:58:40
11	montage will be filmed on May 23rd, 2023, at scene	14:58:44
12	40, correct?	14:58:55
13	A Correct.	14:58:56
14	Q Wayfarer did not call you for that day,	14:58:57
15	right?	14:59:01
16	A Correct.	14:59:01
17	Q And as a result, you were not present for	14:59:02
18	the filming of that dance scene at scene 40?	14:59:05
19	A Correct.	14:59:08
20	Q The call sheet does not indicate that --	14:59:09
21	strike that.	14:59:09
22	You didn't -- you understood that	14:59:20
23	scene 40, the dance scene, would not include	14:59:24
24	intimacy; is that right?	14:59:26
25	A I understood it to be a slow dance. My	14:59:28

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1 expectation there is that actually there may be a 14:59:31
2 choreographer. 14:59:34
3 Q A dance choreographer? 14:59:35
4 A Correct. That would be more -- that would 14:59:38
5 be more likely, depending on the type of slow 14:59:40
6 dance. 14:59:43
7 Q Did you have an understanding as to 14:59:44
8 whether scene 40 would include any kissing? 14:59:46
9 A There was no mention of kissing. 14:59:50
10 Q No mention of kissing in the script? 14:59:52
11 A Correct, from what I see on the 40, in the 14:59:55
12 back. 15:00:03
13 Q What page are you on? 15:00:03
14 A Page 50. Lily and Ryle slow dance in the 15:00:04
15 bar. 15:00:11
16 Q So page 50 of the attachment, scene 40 15:00:12
17 reads, "Lily and Ryle slow dance in the bar, 15:00:15
18 patrons around them drinking and watching sports, 15:00:18
19 completely in their own world," right? 15:00:21
20 A Correct. 15:00:22
21 Q No kissing scripted there? 15:00:26
22 A No. 15:00:26
23 Q Mr. Baldoni didn't express to you that 15:00:27
24 that scene would include kissing? 15:00:29
25 A No. 15:00:30

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1 Q And you hadn't discussed the dance scene 15:00:32
2 at scene 40 with Ms. Lively prior to filming? 15:00:39
3 A No. 15:00:42
4 Q Also on that call sheet is scene 27? 15:00:43
5 A Correct. 15:00:49
6 Q A karaoke scene? 15:00:50
7 A Mm-hmm. 15:00:53
8 Q Wayfarer did not call you for the karaoke 15:00:53
9 scene, correct? 15:00:57
10 A Correct. 15:00:58
11 Q And as a result, you were not on set for 15:00:58
12 the filming of the karaoke scene? 15:01:01
13 A Correct. 15:01:04
14 Q And Mr. Baldoni did not express to you 15:01:04
15 that the karaoke scene would include any form of 15:01:05
16 intimacy including kissing, correct? 15:01:08
17 A Correct. 15:01:11
18 Q You can put that document aside. 15:01:12
19 I'll turn now to discussing the intimate 15:01:21
20 scenes involving the actors playing young Lily and 15:01:26
21 young Atlas that you discussed with counsel 15:01:29
22 earlier. 15:01:32
23 You mentioned earlier that at some point, 15:01:39
24 Mr. Baldoni added simulated sex between the 15:01:41
25 characters of young Lily and young Atlas? 15:01:43

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1 A Correct. 15:01:46

2 Q And those characters were under the age 15:01:47

3 of 18? 15:01:50

4 A Correct. 15:01:51

5 Q At the time that Mr. Baldoni added 15:01:52

6 simulated sex between the characters of young Lily 15:01:56

7 and Atlas, the actors portraying those characters 15:01:59

8 did not have executed nudity riders? 15:02:04

9 A Sorry, can you repeat that? 15:02:06

10 Q When Mr. Baldoni added -- sorry, let me 15:02:07

11 start over. 15:02:14

12 When you learned that Mr. Baldoni was 15:02:15

13 going to add simulated sex to the scenes between 15:02:16

14 young Lily and young Atlas, did the actors 15:02:20

15 portraying those characters have nudity riders? 15:02:25

16 A No. 15:02:28

17 Q Because simulated sex between those 15:02:29

18 characters had not previously been included in the 15:02:31

19 script? 15:02:34

20 A Correct. We wouldn't produce nudity 15:02:34

21 riders for the scenes that don't involve simulated 15:02:38

22 sex or nudity. 15:02:44

23 ATTORNEY ROESER: This will be 47. I'm 15:03:04

24 going to introduce Exhibit 47, which is a document 15:03:07

25 ending in Bates stamp 3478. 15:03:13

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1 portraying young Atlas together or separately? 15:10:18

2 A So we had a rehearsal on -- a few days 15:10:21

3 beforehand at mine and Isabela's request because 15:10:28

4 that's very important, especially when scenes had 15:10:34

5 been added that weren't initially in the script. 15:10:40

6 And I believe I spoke with either Alex 15:10:44

7 first or Isabela first. And I would speak to them 15:10:49

8 separately in person. 15:10:52

9 Q Who attended the rehearsal regarding the 15:10:53

10 simulated sex scene between Alex, Isabela -- Alex 15:10:58

11 and Isabela's characters? 15:11:03

12 A So I was present, and I spoke to them each 15:11:06

13 individually first, and then we had a conversation 15:11:09

14 together, and then Mr. Baldoni came in, and we 15:11:11

15 talked through the scene. And I cannot recall if 15:11:16

16 Jamey Heath was there. 15:11:24

17 Q Do you recall during that rehearsal that 15:11:26

18 Mr. Baldoni added more unscripted intimacy to the 15:11:29

19 scene? 15:11:32

20 A Yes. So I was a bit surprised when we did 15:11:32

21 the rehearsal, just because, one, the position 15:11:37

22 that had been described was probably more of an -- 15:11:43

23 this sounds again a bit strange, but it's an 15:11:50

24 unusual position for a first-time -- of a scene 15:11:53

25 portraying the loss of virginity. 15:11:57

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1	Q	What was the position?	15:11:59
2	A	So the position was with the female on top	15:12:01
3		of the male, very close together.	15:12:06
4	Q	Mr. Baldoni wanted the simulated sex scene	15:12:08
5		between young Atlas and young Lily portraying the	15:12:17
6		first time having sex with young Lily's character	15:12:19
7		very closely on top of young Atlas's character?	15:12:22
8	A	Correct. Initially it was seated, but I	15:12:26
9		suggested that that was probably too extreme for	15:12:29
10		this, and then suggested that if that was the	15:12:33
11		required position, again, maybe it's better if	15:12:36
12		it's in this position.	15:12:38
13	Q	Did Mr. Baldoni express that it was	15:12:40
14		important to him to have young Lily's character on	15:12:43
15		top during this intimate scene?	15:12:48
16	A	That was the position that was requested.	15:12:50
17	Q	He requested -- Mr. Baldoni requested that	15:12:54
18		young Lily's character be on top during the sex	15:12:56
19		scene in which her character had lost her	15:13:00
20		virginity?	15:13:03
21	A	Correct.	15:13:03
22	Q	And you found that unusual?	15:13:04
23	A	It's not typical of the position for a	15:13:05
24		scene of losing virginity.	15:13:10
25	Q	Mr. Baldoni also added additional nudity	15:13:13

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1 to the sex -- simulated sex scene between young 15:13:17
2 Lily and young Atlas, correct, during rehearsal? 15:13:22
3 A I don't recall if there was nudity. I 15:13:25
4 know that we went down to underwear and I was very 15:13:28
5 specific that this underwear needed to be full 15:13:30
6 coverage. 15:13:32

7 Q Did Mr. Baldoni suggest that the underwear 15:13:34
8 should not be full-coverage? 15:13:38

9 A I didn't let that suggestion happen. 15:13:40

10 A As in -- 15:13:43

11 Q Did you -- 15:13:43

12 A As in -- 15:13:44

13 Q -- perceive that he might want -- 15:13:45

14 ATTORNEY HAGGERTY: I'm sorry. Have you 15:13:46
15 finished your answer? I'm sorry. 15:13:47

16 Q Go ahead. 15:13:49

17 A So I made the suggestion very clear at the 15:13:51
18 beginning that there was to be full-coverage 15:13:57
19 underwear. 15:14:00

20 Q Was it your impression that Mr. Baldoni 15:14:00
21 wanted young Lily and Atlas to be portrayed 15:14:02
22 wearing less than full-coverage underwear? 15:14:06

23 ATTORNEY FRITZ: Objection. Calls for 15:14:08
24 speculation. 15:14:09

25 A All I can say is that I removed that from 15:14:14

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1	ever being on the table by suggesting what I	15:14:18
2	suggested.	15:14:24
3	Q Why did you feel you needed to strongly	15:14:25
4	suggest that the actors of young Lily and young	15:14:28
5	Atlas be in full-coverage underwear?	15:14:31
6	ATTORNEY HAGGERTY: Objection to the form.	15:14:35
7	A Because again, I didn't want them to have	15:14:38
8	any expectation that there was going to be nudity	15:14:43
9	in this scene because, again, when I spoke to the	15:14:46
10	actors, I was very clear that there was going to	15:14:49
11	be no nudity during the scene, and you can see	15:14:51
12	that reflected in their riders.	15:14:54
13	Q Did Mr. Baldoni express to you that he	15:14:55
14	wanted that scene to include nudity?	15:14:59
15	A I can't recall in detail. All I know is	15:15:01
16	that in my capacity as intimacy coordinator,	15:15:05
17	working with actors who are doing their first-time	15:15:09
18	sex scene, simulated sex scene, my strong	15:15:12
19	suggestion was to always keep them in underwear.	15:15:17
20	Q Was it your impression that Mr. Baldoni	15:15:21
21	wanted young Atlas and young Lily -- the	15:15:24
22	characters portraying them to be nude?	15:15:27
23	ATTORNEY FRITZ: Objection. Calls for	15:15:30
24	speculation and asked and answered.	15:15:34
25	Q You can answer.	15:15:36

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 into halves. 15:18:21

2 So partial nudity would be maybe nudity 15:18:22

3 above the waist. So that would include, for 15:18:26

4 example, someone who may be -- a female who may be 15:18:28

5 topless. That would include partial nudity. 15:18:33

6 Full nudity is -- as in what we would 15:18:36

7 describe as frontal, below the waist and frontal 15:18:40

8 above the waist. 15:18:43

9 Q For Ms. Ferrer's character in the scene, 15:18:44

10 did undressing to her underwear include keeping a 15:18:49

11 bra on? 15:18:53

12 A Yes. 15:18:53

13 ATTORNEY ROESER: Introducing Exhibit 48. 15:18:58

14 (Talbot Exhibit 48, marked for 15:18:58

15 identification.) 15:19:03

16 THE WITNESS: Can we have a time check? 15:19:03

17 ATTORNEY HAGGERTY: Are you okay? 15:19:08

18 THE WITNESS: Yeah. 15:19:10

19 BY ATTORNEY ROESER: 15:19:12

20 Q This is a document ending in Bates 3488. 15:19:12

21 A Mm-hmm. 15:19:15

22 Q This is a text exchange between you and 15:19:50

23 Mr. Lambert on June 19th, 2023? 15:19:52

24 A Correct. 15:19:54

25 Q This is the day that you rehearsed the 15:19:57

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 simulated sex scene between young Atlas and young 15:20:02
2 Lily? 15:20:07
3 A Correct. 15:20:07
4 Q Can we turn to the page ending in 15:20:08
5 Bates 3490, please. 15:20:10
6 A Yeah. 15:20:11
7 Q At 4:48 P.M., you send a text that 15:20:14
8 says, "Fuck." 15:20:18
9 A Correct. 15:20:19
10 Q "This is a lot." 15:20:19
11 A Mm-hmm. 15:20:19
12 Q "He's asking a lot. And so much is 15:20:22
13 unscripted." 15:20:27
14 Mr. Lambert responds, "I know. Finch is 15:20:29
15 talking to me about it now." 15:20:34
16 And goes on, "What is he asking them to 15:20:38
17 do?" 15:20:42
18 You respond, "So undress to underwear. If 15:20:43
19 there's" -- all caps -- "any way for me to be 15:20:47
20 there, please, because this is a ton"? 15:20:50
21 A Correct. 15:20:55
22 (Reporter clarification.) 15:21:01
23 ATTORNEY ROESER: A ton. 15:21:01
24 Q Why did you send this message? What 15:21:04
25 prompted it? 15:21:05

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 A When we were rehearsing, it became clear 15:21:06
2 that, again, the position on top felt a bit 15:21:10
3 strange. And again, this is where I'm making 15:21:15
4 adjustments in the rehearsal to make sure that, 15:21:19
5 again, she is not seated astride him in a seated 15:21:23
6 position, that we are much closer lying down, face 15:21:28
7 to face. 15:21:33

8 So it felt a lot, because again, this was 15:21:34
9 a new ask of an actor. It's not an illegal ask, 15:21:43
10 it's not outside of SAG guidelines. 15:21:47

11 I'm glad that I'm there, because again, 15:21:53
12 I'm being able to facilitate this, as is my job to 15:21:55
13 do. 15:21:59

14 Actors will -- directors will ask actors 15:22:00
15 of things -- directors will ask things of actors 15:22:03
16 that that may seem extreme or unusual, and it's my 15:22:08
17 job to facilitate that. And you can see me here 15:22:13
18 facilitating this. 15:22:16

19 Q So during the rehearsal, Mr. Baldoni added 15:22:18
20 a lot of unscripted content to the simulated sex 15:22:21
21 scene between the characters of young Atlas and 15:22:30
22 young Lily? 15:22:32

23 A Correct. 15:22:32

24 Q Do you recall what specifically he added? 15:22:33

25 A So the scene is an interrupted scene 15:22:37

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 simulated sex scene, things are changing. 15:32:11

2 Q Scene 45, you mentioned was a 15:32:14

3 cookie-baking or eating scene? 15:32:18

4 A Correct. 15:32:19

5 Q Did that scene, as scripted, involve 15:32:20

6 intimacy between young Atlas and young Lily? 15:32:22

7 A Yes, it involved, like, kissing on the 15:32:25

8 counter. We'd actually walked through that scene 15:32:28

9 in the rehearsal on, I think, the 19th. We had 15:32:32

10 already discussed what that would look like. So 15:32:39

11 we had talked about moments here and there that 15:32:41

12 had -- that we would like to see. They had 15:32:45

13 introduced things that they had discovered with 15:32:49

14 themselves. 15:32:54

15 It's important to note here that these two 15:32:54

16 actors, from my point of view and from what they 15:32:57

17 said, were very comfortable with each other. 15:33:00

18 This is not a scene I am concerned about 15:33:04

19 in terms of these actors working together. This 15:33:09

20 is -- we are now entering a typical dynamic 15:33:13

21 between director and actors. 15:33:16

22 Q Did -- 15:33:21

23 A As opposed to director and actor. 15:33:21

24 Q Did you have concerns that if you were not 15:33:23

25 on set for the filming of scene 45, that 15:33:25

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1	Mr. Baldoni might add additional intimate content	15:33:28
2	that had not been rehearsed previously?	15:33:31
3	A It was a possibility, but, again, not from	15:33:34
4	a -- at this time and at this point, it didn't	15:33:38
5	seem like a nefarious thing. It felt more like a	15:33:43
6	sort of new idea, chaotic on the spot tactic,	15:33:50
7	let's try that, rather than a -- anything	15:33:54
8	sinister, from my interactions with him thus far.	15:33:57
9	Q But at the time, you had the sense that if	15:34:03
10	you were not there for this scene 45, he might add	15:34:05
11	additional intimate content that had not been	15:34:09
12	rehearsed?	15:34:11
13	ATTORNEY HAGGERTY: Objection to the form.	15:34:12
14	A I wanted to make sure I was there, because	15:34:13
15	these are two actors -- again, this is their first	15:34:16
16	scene with any intimate content. So it's sensible	15:34:19
17	that I'm there.	15:34:23
18	Q Based on your interactions with	15:34:23
19	Mr. Baldoni to that point, did you have concerns	15:34:25
20	that he would add additional intimate content to	15:34:29
21	the scene that were not rehearsed?	15:34:32
22	A It was a possibility.	15:34:35
23	Q At 1:09 P.M., you write to Mr. Lambert, "I	15:34:38
24	forget this isn't normal show situation."	15:34:44
25	What did you mean by that?	15:34:46

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 (Recess.) 15:35:48

2 THE VIDEOGRAPHER: We are back on the 15:44:20

3 record. The time is 3:44 P.M. 15:44:45

4 BY ATTORNEY ROESER: 15:44:50

5 Q Ms. Talbot, in Exhibit 49, if you could 15:44:50

6 turn, please, back to the second page, the message 15:44:57

7 is at 1:08 P.M. 15:45:00

8 A Mm-hmm. Sorry, yes. 15:45:02

9 Q At 1:08 P.M., Mr. Lambert wrote, "And with 15:45:04

10 Justin, I think it's a good idea if you're there," 15:45:07

11 right? 15:45:10

12 A Correct. 15:45:10

13 Q He did not say, because of the strike, I 15:45:11

14 think it's a good idea that you're there? 15:45:14

15 A Correct. 15:45:15

16 Q He said because Justin? 15:45:16

17 A Correct. 15:45:20

18 Q You can set that document aside. 15:45:21

19 ATTORNEY ROESER: Exhibit 50 will be a 15:45:32

20 document ending in Bates stamp 3611. We will 15:45:33

21 distribute now. 15:45:38

22 (Talbot Exhibit 50, marked for 15:45:38

23 identification.) 15:45:38

24 BY ATTORNEY ROESER: 15:46:08

25 Q This is a text exchange between you and 15:46:08

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1	Mr. Lambert on June 22nd, 2023, correct?	15:46:16
2	A Correct.	15:46:19
3	Q This is the day that the simulated sex	15:46:20
4	between young Atlas and young Lily was filmed?	15:46:24
5	A Correct. That was in the evening.	15:46:26
6	Q On the morning of the 22nd, Mr. Lambert	15:46:28
7	messages you and says, "Okay, good morning," and	15:46:36
8	you respond, "We'll see."	15:46:38
9	A Mm-hmm.	15:46:40
10	Q Why did you respond that way?	15:46:41
11	A Because I knew we had a lot to do that	15:46:43
12	day. I was unconvinced that we would get it all.	15:46:46
13	Q Why is that?	15:46:52
14	A We had three big scenes to do and I	15:46:53
15	thought we would be under significant time	15:46:57
16	pressure to do that.	15:47:01
17	Q At 10:55 A.M., you message Mr. Lambert and	15:47:02
18	say, "OMG, this is wild."	15:47:05
19	He responds, "What's happening?"	15:47:08
20	You say, "Just an entire scene of improv."	15:47:10
21	He goes on, "Ha ha, yeah," and you	15:47:17
22	respond, "Wowee, now changing all the action."	15:47:22
23	Mr. Lambert says, "Are they having sex on	15:47:26
24	the counter yet?"	15:47:28
25	And you respond, "Give it time, I think	15:47:29

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 we'll throw that in last minute." 15:47:31

2 Right? 15:47:36

3 A Correct. 15:47:37

4 Q What prompted you to send the message, 15:47:37

5 "OMG, this is wild"? 15:47:41

6 A This is a scene about making cookies. We 15:47:43

7 had rehearsed it and it was fairly chaotic with 15:47:46

8 things changing. 15:47:51

9 Q Chaotic in what sense? 15:47:53

10 A In that there was some components of the 15:47:58

11 piece, Kevin McKidd was coming in and 15:48:00

12 interrupting. We were hiding Alex. We were 15:48:03

13 placing young Lily on the counter. He was -- 15:48:07

14 there was some intimate action there. 15:48:12

15 And again, it was -- I can't express 15:48:16

16 enough, this is, again, really regarding -- mainly 15:48:20

17 regarding, like, the chaotic nature of filming any 15:48:26

18 scene during the strike. Things that would 15:48:31

19 typically be in place are not really in place. 15:48:36

20 And again, it can be anything down from, like, you 15:48:41

21 know, we had an oven on set, the cookies were 15:48:45

22 supposed to come out warm, I think at one point 15:48:49

23 they came out cold. You know, like, there was 15:48:51

24 just a lot of chaotic action. And with the 15:48:53

25 improv, again, it was a lot of Justin going, okay, 15:49:00

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 now this is happening and now this is happening 15:49:02
2 and this is happening. 15:49:07

3 And with regards to the intimate action, 15:49:08
4 again, I'm there, I'm on set, I'm navigating that, 15:49:10
5 I make sure we go through a rehearsal, I'm 15:49:13
6 constantly checking in with these two actors 15:49:16
7 because I want to. 15:49:18

8 Q Was Mr. Baldoni adding intimate action 15:49:19
9 during that -- during the cookie scene? 15:49:22

10 A I believe that there was some intimate 15:49:25
11 action that was added, but I will say, that's not 15:49:28
12 unusual in this because what we do is we will make 15:49:31
13 sure that we would do that in rehearsal. We make 15:49:36
14 sure that we're choreographing everything 15:49:39
15 appropriately and talking to actors. 15:49:43

16 What is always scripted -- again, like 15:49:46
17 obviously, if we can follow the script, that's 15:49:50
18 great, but actors will come up with ideas and 15:49:53
19 suggestions that don't always follow the script. 15:49:55
20 At this point, there's no simulated additional 15:49:58
21 action going on. It's -- sorry. 15:50:02

22 Q Was Mr. Baldoni adding intimate action to 15:50:06
23 the cookie scene that had not been rehearsed? 15:50:09

24 A I believed that there was a suggestion of 15:50:12
25 either placing Isabela on the counter or, again, 15:50:18

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1	kissing on the counter that may have been	15:50:29
2	extended.	15:50:35
3	Q Was there -- did Mr. Baldoni suggest	15:50:36
4	Isabela, Ms. Ferrer, licking batter off of the	15:50:40
5	other actor's finger?	15:50:48
6	A Yes, I believe -- I can't say with	15:50:50
7	100 percent certainty, but I do remember a batter	15:50:54
8	situation occurring.	15:50:59
9	Q Do you recall Mr. Baldoni suggesting that	15:51:01
10	Ms. Ferrer's character lick batter off of the	15:51:03
11	actor portraying Mr. -- young Atlas's finger while	15:51:07
12	looking up at him?	15:51:13
13	A Correct, I believe she may have been	15:51:14
14	sitting on the counter at that point. And again,	15:51:16
15	this is all things that we can agree on on the	15:51:23
16	day. This is me constantly checking in.	15:51:26
17	Q And again, these are intimate acts that	15:51:29
18	Mr. Baldoni had added after the scene had already	15:51:32
19	been rehearsed?	15:51:36
20	ATTORNEY HAGGERTY: Objection to the form.	15:51:39
21	Q I can clarify.	15:51:43
22	The -- Mr. Baldoni's suggestion that	15:51:46
23	Ms. Ferrer's character lick cake batter -- cookie	15:51:47
24	batter off of the other actor's finger and look up	15:51:52
25	at him was not rehearsed?	15:51:55

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Transcript of Elizabeth Talbot

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1 working together and communicating really well. 15:53:10

2 As far as I'm concerned, these actors are 15:53:13

3 safe because they're together and I'm watching 15:53:15

4 them communicate, and at no point are they ever 15:53:17

5 expressing discomfort with each other. And, for 15:53:21

6 me, that's very important when I'm working as an 15:53:23

7 intimacy coordinator. 15:53:27

8 Q Did you expect during this scene that 15:53:27

9 Mr. Baldoni would add further additional sexual 15:53:30

10 content? 15:53:37

11 A I hoped not. 15:53:38

12 Q Did you expect that he might? 15:53:39

13 A It's a possibility. But it's also 15:53:41

14 something that would not be allowed to happen 15:53:49

15 because that would have been outside the nudity 15:53:51

16 rider, and I would have stepped in immediately at 15:53:53

17 that point to say, this is outside of the nudity 15:53:57

18 rider, we would not be able to do it for that 15:54:00

19 scene. We do not have a nudity rider for this 15:54:03

20 scene currently. 15:54:05

21 Q You would not have permitted Mr. Baldoni 15:54:06

22 to add additional sexual content to the 15:54:09

23 cookie-baking scene, correct? 15:54:11

24 A Any simulated -- anything that would 15:54:12

25 require a rider, absolutely not. That would have 15:54:14

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Transcript of Elizabeth Talbot

Conducted on August 21, 2025

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1 been a phone call to SAG straightaway. 15:54:18

2 Q But you considered that it might be a 15:54:21

3 possibility that he would attempt to add 15:54:23

4 additional sexual content to the scene? 15:54:25

5 A It was possible. 15:54:26

6 Q And are aware if Isabella and Alex had 15:54:28

7 executed nudity riders in effect at the time of 15:54:33

8 the scene? 15:54:38

9 A They both had nudity riders that were sent 15:54:38

10 to their agents, I believe. 15:54:44

11 Q Do you know -- 15:54:46

12 A Sorry. 15:54:46

13 ATTORNEY HAGGERTY: Were you done? Were 15:54:47

14 you done answering the question? 15:54:49

15 THE WITNESS: I think so. 15:54:51

16 ATTORNEY HAGGERTY: Okay. 15:54:52

17 Q Do you know if -- if they had executed the 15:54:52

18 nudity riders at that time? 15:54:56

19 A By that scene, I don't know. I think one 15:55:00

20 of the actors was going to sign on set. 15:55:04

21 And again, as long as they sign before we 15:55:08

22 shoot the scene -- so they can sign on set right 15:55:11

23 before we shoot the scene. It doesn't have to be, 15:55:15

24 like, at the beginning of the day, because again, 15:55:20

25 that's our 48 hours. That's where our 48 hours 15:55:23