

# Exhibit 23

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

4 )  
5 BLAKE LIVELY, )  
6 Plaintiff, )  
7 vs. ) No. 1:24-CV-10049-LJL  
8 ) (Consolidated with  
9 WAYFARER STUDIOS LLC, a ) 1:25-cv-00449-LJL  
10 Delaware Limited Liability )  
11 Company, JUSTIN BALDONI, an )  
12 individual, JAMEY HEATH, an )  
13 individual, STEVE SAROWITZ, an ) HIGHLY CONFIDENTIAL -  
14 individual, IT ENDS WITH US ) ATTORNEYS' EYES ONLY  
15 MOVIE LLC, a California )  
16 Limited Liability Company, )  
17 MELISSA NATHAN, an individual,)  
18 THE AGENCY GROUP PR LLC, a )  
19 Delaware Limited Liability )  
20 Company, JENNIFER ABEL, an )  
21 individual, JED WALLACE, an )  
22 individual, and STREET )  
23 RELATIONS INC., a California )  
24 Corporation, )  
25 )  
26 Defendants. )  
27 )  
28 )  
29 (RELATED CONSOLIDATED CASE. )  
30 )

VIDEOTAPED DEPOSITION OF SHELLEY ANNE CARROLL  
Los Angeles, California  
Thursday, September 25, 2025

Reported by:  
RENEE A. PACHECO, RPR, CLR  
CSR No. 11564

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1       in the first phase of production?

2       A    Yes.

3       Q    Can you describe for me what you recall  
4       about the occasion on which Mr. Heath arrived to  
5       Ms. Lively's hair and makeup trailer?

6       A    Yes. Do you want me to describe like  
7       the --

8       Q    Sure. Go ahead and ask your question.

9       A    Like the whole -- that sort of moment, like  
10      the whole morning or.

11      Q    Why don't we do it this way. If you  
12      could -- it sounds like there's a certain occasion  
13      on which Mr. Heath's arrival to Ms. Lively's hair  
14      and makeup trailer sticks out in your mind; is that  
15      right?

16      A    Yes.

17      Q    Can you please describe for me the moment  
18      at which you understood Mr. Heath was arriving to  
19      the trailer to the point at which Mr. Heath exited  
20      the trailer?

21      A    Okay. We -- Blake was having body makeup  
22      done in the trailer by Vivian. We heard the door  
23      open and looked and went "Whoa, whoa, whoa." And it  
24      was Jamey at the door. I had grabbed a cutting cape  
25      which was over my chair and held it up to try and

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1 cover her. And she said -- Blake said, "Whoa, whoa.  
2 I'm" -- you know, "Don't come in." And he said, "It  
3 will only take a second." And that's when all of  
4 that action was happening. He stayed in the  
5 trailer, they had a discussion, and he left.

6 Q Did you know that Mr. Heath was going to be  
7 coming to the trailer when he did?

8 A I did not.

9 Q Did you have an understanding that  
10 Mr. Heath was invited to the trailer by Ms. Lively?

11 A I did not.

12 Q Did you understand that Ms. Lively did not  
13 expect Mr. Heath to come to the trailer at that  
14 moment?

15 MS. GAROFALO: Objection.

16 THE DEPONENT: Say that again. Sorry.

17 BY MS. BENDER:

18 Q Did you have an understanding that  
19 Ms. Lively was not expecting Mr. Heath to show up at  
20 her hair and makeup trailer at that moment?

21 A By her reaction, yes.

22 Q Did Mr. Heath abide by the protocol of  
23 knocking on the door that you described earlier  
24 today?

25 A No.

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1           Q   Did Mr. Heath ask for permission to open  
2   the door into Ms. Lively's private hair and makeup  
3   trailer?

4           A   No.

5           Q   You stated that you, Ms. Lively, and  
6   Ms. Baker verbally indicated something to the effect  
7   of whoa, whoa, whoa when Mr. Heath was opening the  
8   door; is that right?

9           A   Yes.

10          Q   And did you, Ms. Lively, Ms. Baker give a  
11   loud verbal indication that the trailer was occupied  
12   at that point in time?

13          A   I believe we were speaking loudly.

14          Q   So you had an understanding that Mr. Heath  
15   heard you when you said something to the effect of  
16   whoa, whoa, whoa as he was entering her private hair  
17   and makeup trailer?

18           MS. GAROFALO: Sorry. Objection.

19           THE DEPONENT: Yes.

20          BY MS. BENDER:

21          Q   And did Mr. Heath nevertheless open the  
22   door to the hair and makeup trailer?

23          A   Yes.

24          Q   Now, at this point in time, where was  
25   Ms. Lively situated in the hair and makeup trailer?

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1           A    She was towards the far right of the  
2           trailer, standing.

3           Q    And which direction was Ms. Lively facing  
4           when she was standing in the trailer?

5           A    I don't recall.

6           Q    Do you recall what Ms. Lively was wearing  
7           at that moment in the trailer?

8           A    Either nothing or a nude thong.

9           Q    Ms. Lively's breasts were exposed in that  
10           moment?

11           A    Yes.

12           Q    And Ms. Lively was generally undressed and  
13           unclothed?

14           A    Yes.

15           Q    And was that one of the reasons why you and  
16           Ms. Carroll and Ms. Lively indicated that Mr. Heath  
17           should not enter the trailer at that point in time?

18           A    Yes.

19           Q    And would you have expected Mr. Heath to  
20           heed that request?

21           MS. GAROFALO: Objection.

22           MR. ROBINSON: Objection to form.

23           THE DEPONENT: I don't know why he would  
24           have come up.

25           ///

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1 BY MS. BENDER:

2 Q Mr. Heath walked into Ms. Lively's hair and  
3 makeup trailer while she was unclothed without  
4 knocking, without permission; correct?

5 A Yes.

6 Q And that was after you and others loudly  
7 tried to stop Mr. Heath from entering the trailer?

8 MS. GAROFALO: Objection.

9 THE DEPONENT: We verbally said "Whoa,  
10 whoa, whoa," you know. Yes.

11 BY MS. BENDER:

12 Q Don't come in?

13 A Yeah, I don't remember saying "Don't come  
14 in," but we were like, "Whoa, whoa, whoa. Just a  
15 minute" warning him.

16 Q And at that point Mr. Heath stayed; is that  
17 right?

18 A Yes.

19 Q And where was Mr. Heath standing for the  
20 remainder of his time at the trailer?

21 A I am not completely -- my back was to him,  
22 so he was behind me.

23 Q And was your back to Mr. Heath because you  
24 were standing with a cloth to cover Ms. Lively for  
25 modesty?

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1       trailer for entering without permission?

2           A    I don't remember that.

3           Q    Do you recall why Mr. Heath was at the  
4       trailer?

5           MS. GAROFALO: Objection.

6           THE DEPONENT: I don't.

7       BY MS. BENDER:

8           Q    And you believe it was unclear to Mr. Heath  
9       at that point in time that Ms. Lively was in a state  
10      of undress?

11           MR. ROBINSON: Objection to form.

12           MS. GAROFALO: Join.

13           THE DEPONENT: Can you ask that again.

14       Sorry.

15       BY MS. BENDER:

16           Q    Do you believe that it was clear during the  
17      course of the interaction between Mr. Heath and  
18      Ms. Lively that Ms. Lively was in a state of  
19      undress?

20           MS. GAROFALO: Objection.

21           THE DEPONENT: Yes.

22       BY MS. BENDER:

23           Q    And from your perspective do you think that  
24      would have been clear to Mr. Heath himself?

25           A    Yes, once he stepped up into the trailer.

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1           Q    But nevertheless, at that point he stayed  
2    in the trailer?

3           A    Yes.

4           Q    Given your understanding of where  
5    Ms. Lively and Mr. Heath were in the trailer, if  
6    Mr. Heath had looked into the mirror, would he have  
7    seen Ms. Lively's breasts exposed?

8           MS. GAROFALO: Objection.

9           THE DEPONENT: You can see the room when  
10   you look -- you can see into different parts of the  
11   room through reflection, yes.

12          BY MS. BENDER:

13          Q    And so from where Mr. Heath was standing,  
14   if Ms. Lively was facing the mirror Mr. Heath could  
15   have seen Ms. Lively's breasts exposed; is that  
16   correct?

17          MS. GAROFALO: Objection.

18          THE DEPONENT: He would be able to see her,  
19   yes.

20          BY MS. BENDER:

21          Q    How did this interaction between Mr. Heath  
22   and Ms. Lively in Ms. Lively's hair and makeup  
23   trailer make you feel?

24          A    Uncomfortable. It was strange.

25          Q    You found the interaction between Mr. Heath

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1 and Ms. Lively uncomfortable and strange?

2 A I felt uncomfortable and strange.

3 Q And why did you feel uncomfortable when  
4 Mr. Heath came to Ms. Lively's trailer that day?

5 A I guess because we had warned him, you  
6 know, she was in a state where nobody else should  
7 have seen her in that way. And he stayed. So it  
8 was a strange interaction.

9 Q And you testified as well that that  
10 interaction made you feel strange?

11 A Yeah. Uncomfortable and strange.

12 Q Had you ever seen that type of conduct from  
13 a producer on a film set before?

14 A I have not.

15 Q And would you expect to have seen that type  
16 of conduct previously?

17 MS. GAROFALO: Objection.

18 THE DEPONENT: It's not my experience that  
19 that has ever happened on any of the sets I've  
20 worked on before.

21 BY MS. BENDER:

22 Q Did you view that conduct by Mr. Heath as  
23 inappropriate?

24 MS. GAROFALO: Objection.

25 THE DEPONENT: Yes, I do.

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1                   THE DEPONENT: I'm not sure what the  
2 purpose of the meeting was. So I don't know -- I  
3 don't know what -- why he came. I don't know his  
4 motivation to coming into the trailer.

5 BY MS. BENDER:

6                   Q Can you think of any meeting that would be  
7 so important that Mr. Heath had to come into the  
8 trailer uninvited and stay while Ms. Lively was  
9 undressed?

10                  MS. GAROFALO: Objection.

11                  THE DEPONENT: I don't.

12 BY MS. BENDER:

13                  Q You cannot?

14                  A I cannot, yeah.

15                  Q Did Mr. Heath's unannounced entry to the  
16 trailer happen on more than one occasion?

17                  A I don't recall.

18                  Q The incident that we just discussed is the  
19 only in- -- instance that you recall in which  
20 Mr. Heath arrived unannounced to Ms. Lively's  
21 trailer; is that right?

22                  A Yes.

23                  Q When Mr. Heath exited the trailer that day,  
24 did you discuss the incident with Ms. Baker or  
25 Ms. Lively?

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1 A Yes, we did.

2 Q And what do you recall about that  
3 discussion?

4 A She, Blake, said to us, "He was staring at  
5 me in the mirror." And I just recall being sort of  
6 flabbergasted by the whole experience, you know.

7 Q Were you shocked?

8 A Yeah, shocked. Yeah, sure. Shocked.

9 Q Did Ms. Lively appear to you to be  
10 distressed or shocked by the incident?

11 A Yes, she was agitated by it and -- yeah.

12 Q And how could you tell that Ms. Lively was  
13 agitated by the incident with Mr. Heath in her hair  
14 and makeup trailer?

15 A Just by her actions, feeling uncomfortable  
16 and just actually saying the words. You know, "He  
17 was staring at me," you know, "in the mirror. I  
18 can't believe it." Just shock.

19 Q You perceived Ms. Lively to be shocked by  
20 the interaction with Mr. Heath?

21 A Yes.

22 Q And did Ms. Lively -- when Ms. Lively  
23 stated that he was staring at her in the mirror, did  
24 you understand that to mean that Mr. Heath had  
25 viewed Ms. Lively's exposed breasts in the mirror?

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1           A    I can't speak to her exposed breasts but to  
2    a nude body in some -- a visual of her unclothed.

3           Q    And to be clear, your recollection is that  
4    at that point in time Ms. Lively was wearing nothing  
5    more than potentially a nude thong?

6           A    Correct.

7           Q    Did you perceive Ms. Baker's reaction with  
8    the inci- -- the from the incident with Mr. Heath  
9    and Ms. Lively's hair and makeup trailer?

10          A    Yes.

11          Q    And did you perceive that Ms. Baker was  
12    shocked or uncomfortable in any way?

13          A    Yes. We all felt the same.

14          Q    And by "we," you mean Ms. Lively, Ms. Baker  
15    and yourself?

16          A    And myself. Yes.

17          Q    Did you ever discuss the incident with  
18    Mr. Heath in his hair and make -- in Ms. Lively's  
19    hair and makeup trailer with anyone beyond Ms. Baker  
20    and Ms. Lively?

21          A    No.

22          Q    Did you at any point in time take steps to  
23    prevent the uninvited entry of individuals into  
24    Ms. Lively's private hair and makeup trailer?

25           MS. GAROFALO: Objection.

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1                   THE DEPONENT: I did.

2                   BY MS. BENDER:

3                   Q    And what were those steps?

4                   A    I started locking the door to the -- the  
5                   sliding door between the two sections of the trailer  
6                   was always locked while we were processing her.  
7                   After that incident I started locking the exit to  
8                   the outside as well.

9                   Q    In your experience on other film sets, did  
10                   you commonly lock the doors to a private hair and  
11                   makeup trailer?

12                  A    We usually lock the sliding door that -- if  
13                  there's a sliding door that separates the trailer,  
14                  while processing, that is usually locked.

15                  Q    And in your experience on other film sets,  
16                  did you typically -- you or someone else --  
17                  typically lock the outside entrance and exit to a  
18                  hair and makeup trailer?

19                  A    It can be.

20                  Q    And on this occasion with respect to "It  
21                  Ends With Us," your locking of the door for outside  
22                  access to Ms. Lively's hair and makeup trailer was  
23                  precipitated by Mr. Heath's conduct?

24                  A    Yes. I wanted to prevent that from  
25                  happening again.

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1 Q You wanted to keep Ms. Lively's hair and  
2 makeup trailer a private and safe space?

3 A Correct.

4 Q Do you recall Mr. Baldoni ever entering  
5 Ms. Lively's hair and makeup trailer without  
6 invitation?

7 A I don't.

8 Q You don't recall either way?

9 A I don't recall either way.

10 Q Did other individuals besides Mr. Heath on  
11 occasion enter Ms. Lively's hair and makeup trailer?

12 A Yes.

13 Q And was that typically by use of the  
14 knocking protocol that we discussed earlier?

15 A Yes.

16 Q And in other words, it was with consent of  
17 Ms. Lively that individuals would enter her private  
18 hair and makeup trailer?

19 A Yes.

20 Q Did anyone other than Mr. Heath on the set  
21 of "It Ends With Us" enter Ms. Lively's private hair  
22 and makeup trailer without her consent, that you can  
23 recall?

24 A Not that I can recall.

25 Q Did you ever read the script for "It Ends

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1 A Yes.

2 Q Do you recall witnessing Mr. Baldoni ever  
3 improvise scenes on the set of "It Ends With Us"?

4 A Yes.

5 Q Do you recall witnessing Mr. Baldoni  
6 improvise scenes on the set of "It Ends With Us" to  
7 make them more intimate?

8 A Yes.

9 Q How did Mr. Baldoni improvise scenes on the  
10 set of "It Ends With Us" to make those scenes more  
11 intimate?

12 MS. GAROFALO: Objection.

13 THE DEPONENT: By more kissing, dance --  
14 being closer, you know, to Blake physically.

15 BY MS. BENDER:

16 Q And you witnessed those interactions when  
17 you were observing the actors filming a scene; is  
18 that right?

19 A Yes.

20 Q And I thought I heard you mention the word  
21 "dance." Do you have a particular scene in mind  
22 where you witnessed Mr. Baldoni improvising  
23 intimacy?

24 A Yes.

25 Q And what scene is that?

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1 matter of the scene that's being filmed. How  
2 exposed an actor may be in that scene.

3 BY MS. BENDER:

4 Q And to be clear, did you think it would be  
5 important for certain scenes to have a closed set  
6 based on your vast experience in the film industry?

7 MS. GAROFALO: Objection. Experience as a  
8 hairdresser.

9 THE DEPONENT: Say that again. Like, yes,  
10 there should be times when there should be a closed  
11 set.

12 BY MS. BENDER:

13 Q Was the birthing scene in connection with  
14 "It Ends With Us," in your view, an intimate scene  
15 in any way?

16 A Yes.

17 Q How was the birthing scene of "It Ends With  
18 Us" intimate, in your view?

19 MS. GAROFALO: Objection, by the way.

20 THE DEPONENT: The -- the position that the  
21 actor, Blake, would have to be in.

22 BY MS. BENDER:

23 Q And can you describe Ms. Lively's position  
24 in connection with the birthing scene?

25 A She was on a hospital bed that had

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1       stirrups, and her legs -- both her feet were in the  
2       stirrups.

3           Q     So Ms. Lively would be lying on her back  
4       with both of her legs in stirrups spread apart; is  
5       that right?

6           A     Correct.

7           Q     And in your view, that was an intimate  
8       position to be in?

9           A     Yes.

10          Q     Do you think that simulating childbirth is  
11       an intimate type of scene?

12           MS. GAROFALO: Objection.

13           THE DEPONENT: Yes.

14          BY MS. BENDER:

15          Q     And do you find simulating childbirth to be  
16       a vulnerable type of scene to perform?

17           MS. GAROFALO: Objection.

18           THE DEPONENT: Yes.

19          BY MS. BENDER:

20          Q     And do you find simulating childbirth an  
21       intimate type of scene to observe?

22           MS. GAROFALO: Objection.

23           THE DEPONENT: It can be, yes.

24          BY MS. BENDER:

25          Q     And was the birthing scene in connection

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1       with "It Ends With Us" intimate --

2                    MS. GAROFALO: Objection.

3       BY MS. BENDER:

4           Q    -- in your view?

5           A    Yes.

6           Q    The birthing scene was in a hospital; is  
7       that right?

8           A    I believe so.

9           Q    It wasn't, for example, a home birth?

10          A    No. It was at a hos- -- the scene took  
11       place in a hospital room, yeah.

12          Q    And so did you have understand- -- any  
13       understanding arriving to set that day as to what  
14       Ms. Lively would be wearing in connection with the  
15       birthing scene?

16          A    Yes.

17          Q    What was your understanding as to what  
18       Ms. Lively would be wearing in connection with the  
19       birthing scene when you arrived on set that day?

20          A    A hospital gown.

21          Q    And why was it your understanding that  
22       Ms. Lively would be wearing a hospital gown?

23          A    Because we had discussed -- well, I knew  
24       that it was in a hospital, so she'd be wearing a  
25       hospital gown. And, also, as far as like body

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1 MS. GAROFALO: Objection.

2 THE DEPONENT: I don't know if this person  
3 was an actor or just a friend so, therefore, I do  
4 think that it was -- yeah. I thought it was  
5 inappropriate.

6 BY MS. BENDER:

7 Q It was your understanding that the OB/GYN  
8 in the scene was Mr. Baldoni's friend; is that  
9 right?

10 A Yes.

11 Q And as the OB/GYN in that scene,  
12 Mr. Baldoni's friend would be seated or standing  
13 between Ms. Lively's legs?

14 A Yes. At the end of the hospital bed.

15 Q And Ms. Lively's legs would be in stirrups  
16 at the time?

17 A Yes.

18 Q And her legs would be spread apart?

19 A Yes.

20 Q And so the OB/GYN would have a clear view  
21 of Ms. Lively's genital area; is that right?

22 MS. GAROFALO: Objection.

23 THE DEPONENT: Yes.

24 BY MS. BENDER:

25 Q With respect to what Ms. Lively was wearing

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1       during the birthing scene, did you have an  
2       understanding that at any points in time Ms. Lively  
3       was wearing virtually no clothing from her waist  
4       down?

5           A    Can you repeat that?

6           Q    With respect to what Ms. Lively was wearing  
7       during the birthing scene.

8           A    Right.

9           Q    Did you have an understanding that at some  
10       points in time Ms. Lively was wearing no clothing  
11       essentially from her waist down?

12          A    From what I could see on the monitor, that  
13       is how it appeared, yes.

14          Q    And did it appear that way because the  
15       shots that were being filmed would require that  
16       Ms. Lively not wear, for example, shorts or other  
17       clothing that would appear on film?

18          A    Yes. To make it realistic, she wouldn't,  
19       yes.

20          Q    Okay. Putting aside the OB/GYN, did you  
21       discuss with Ms. Lively her experience with the  
22       birthing scene?

23          A    No.

24          Q    Did you ever discuss with Ms. Lively after  
25       the birthing scene concluded the -- a suggestion

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1                   I, the undersigned, a Certified Shorthand  
2                   Reporter of the State of California, Registered  
3                   Professional Reporter, Certified Live Note Reporter,  
4                   do hereby certify:

5                   That the foregoing proceedings were taken  
6                   before me at the time and place herein set forth;  
7                   that any witnesses in the foregoing proceedings,  
8                   prior to testifying, were duly sworn; that a record  
9                   of the proceedings was made by me using machine  
10                  shorthand which was thereafter transcribed under my  
11                  direction; that the foregoing transcript is a true  
12                  record of the testimony given.

13                  Further, that if the foregoing pertains to  
14                  the original transcript of a deposition in a Federal  
15                  Case, before completion of the proceedings, review  
16                  of the transcript [ ] was [ ] was not requested.  
17                  I further certify I am neither financially  
18                  interested in the action nor a relative or employee  
19                  of any attorney or party to this action.

20                  IN WITNESS WHEREOF, I have this date  
21                  subscribed my name.

22                  Dated: September 26, 2025



24                  RENEE A. PACHECO

25                  CSR No. 11564 RPR, CLR