

Exhibit 28

1 ALEXANDER - CONFIDENTIAL
2 conversation that happened in the car ride,
3 but right now my questions are just about
4 this paragraph that I read.

5 Did you ever hear Mr. Baldoni
6 discuss his personal sexual experience?

7 MS. ROESER: Objection.

8 A. Yes.

9 Q. Did that occur during that car
10 ride?

11 A. Yes.

12 Q. Did you ever hear Mr. Baldoni
13 discuss a porn addiction?

14 A. No.

15 Q. Did you ever hear Mr. Baldoni
16 try to pressure Ms. Lively to reveal
17 details about her intimate life?

18 A. No.

19 Q. Now I'm going to read from
20 paragraph 92 of the complaint, and, again,
21 if you want me to hand it to you so you can
22 read it, you just let me know.

23 "During a car ride with
24 Ms. Lively, her assistant, and driver,
25 Mr. Baldoni claimed to Ms. Lively that he

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2 had been sexually abused by a former
3 girlfriend which he has since shared
4 publicly." I'm going to stop there.

5 Where did the car ride start,
6 like what destination did everyone get into
7 the car?

8 A. The apartment.

9 Q. And without giving me the
10 address, what apartment are you referring
11 to? By that, can you give me a borough,
12 uptown, downtown?

13 A. Tribeca.

14 Q. And is that your employer's
15 apartment?

16 A. Yes.

17 Q. What time did that car ride
18 start?

19 A. I would say midday.

20 Q. Is that before noon or after
21 noon?

22 A. Roughly right before noon.

23 Q. And were you already present at
24 the Tribeca apartment when everyone got
25 into the car? I mean, had you been waiting

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2 Q. Who told you that?

3 A. Blake.

4 Q. Did Blake say anything else to
5 you other than "This is Justin"?

6 A. No.

7 Q. Did anyone else get into the
8 car other than Sophia, Blake Lively, and
9 Justin Baldoni?

10 A. No.

11 Q. Where was Sophia sitting in the
12 car?

13 A. Front passenger.

14 Q. And where was Ms. Lively
15 sitting?

16 A. Strong side, behind me, behind
17 the driver's seat.

18 Q. And that would leave
19 Mr. Baldoni in the rear passenger?

20 A. Rear passenger, behind Sophia.

21 Q. What type of car was it?

22 A. Escalade.

23 Q. And do you know who owned that
24 vehicle?

25 A. Walkers Holding.

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2 Q. And what is Walkers Holding?

3 A. That's what I know. It is on
4 the insurance card.

5 Q. It wasn't your personal
6 vehicle?

7 A. No.

8 Q. And where were you going? I
9 know you picked them up outside the
10 apartment in Tribeca. Do you know where
11 you were heading?

12 A. To Jersey to a production
13 office.

14 Q. When was this car ride? Can
15 you give me the month?

16 A. Springtime 2023 I can recall.

17 Q. Did you make any stops along
18 the way from Tribeca to the New Jersey
19 production office other than traffic stops
20 at lights, stop signs, things like that?

21 A. No.

22 Q. Did you pick anyone else up
23 along the way?

24 A. No.

25 Q. How long was the car ride from

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2 Tribeca to the New Jersey production
3 office?

4 A. 20 to 25 minutes.

5 Q. That's pretty good, no traffic
6 that day.

7 Was the radio on during any
8 portion of that car ride?

9 MS. ROESER: Objection.

10 A. No.

11 Q. And it was during that period
12 of time where you heard Mr. Baldoni discuss
13 his personal sexual experience; is that
14 correct?

15 A. Yeah.

16 Q. Did you hear Mr. Baldoni
17 discuss anything else during that car ride?

18 A. Yes.

19 Q. Can you tell us what you heard
20 him discuss during the car ride?

21 A. He was discussing his sexual
22 relations with women. As we were driving,
23 he stated that, and it took my focus off
24 driving because I can't forget this, you
25 know, his sexual relations with women, how

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2 he was forced on and he forced himself on
3 women. To me it was very out of the
4 ordinary to meet somebody and talk like
5 that in a vehicle. That's why it caught my
6 attention.

7 Basically he kept talking about
8 his sexual relations, and, again, like I'm
9 repeating myself I believe, but, you know,
10 he would force himself on women. If they
11 said no, this, that, he would revert back.
12 It was just disturbing.

13 Q. Anything else that you can
14 recall?

15 A. While we were driving, for some
16 reason he pointed out his place of living.

17 Q. I'm sorry?

18 A. His place of living in Jersey
19 City as we were driving. I remember that.
20 He for some reason had us pause. And then
21 when we got to the production office, which
22 was down the road from that area, I pulled
23 over, let everybody out, I stated to Blake
24 "I feel very uncomfortable. Something is
25 not right here. I would like to do a

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2 background check on him or something," and
3 later to learn that he was the producer in
4 production of this movie.

5 Q. How did you learn that?

6 A. Basically when I brought up his
7 name, everybody was like he is part of the
8 movie, you know. Well, I shouldn't say it
9 that way. Like Sophia and Blake said, you
10 know, that's the production guy, you know,
11 that movie.

12 Q. Okay. Do you recall anything
13 else discussed during that car ride other
14 than what you have already told us?

15 A. I can go through it again. It
16 just stuck in my head. It is just
17 basically --

18 Q. I'm not asking you to repeat
19 yourself, I'm asking did you leave anything
20 out?

21 A. Him having sexual relations,
22 force himself on women, women force
23 themselves on him. It is straightforward,
24 standard, what went on in that car ride.

25 He did -- he did ramble on

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2 about more stuff, but I didn't pay
3 attention to it because I was focused on
4 driving. It is those key points when
5 someone says, you know, forcing myself on
6 women, women forced on me, I don't -- I
7 didn't care, like, you know, it is
8 disturbing to me. You can't forget
9 something like that.

10 Q. Okay.

11 A. So that is mainly it.

12 Q. Okay. Did his tone of voice or
13 volume of speaking remain the same during
14 the car ride or were there periods of time
15 where his voice was amplified or he started
16 to talk lower or something else?

17 MS. ROESER: Objection.

18 A. I don't recall.

19 Q. When in relation to them
20 getting into the car did he start to
21 discuss these topics that you just raised?

22 MS. ROESER: Objection.

23 Q. And if it's not clear, you
24 know, was it right away, was it five
25 minutes in, was it closer to the production

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2 need to be on heightened alert or do
3 anything different?

4 MS. ROESER: Objection.

5 A. Not that I recall.

6 MR. SCHUSTER: I have nothing
7 else.

8 MS. ROESER: I have just a
9 couple of questions before we go off
10 record.

11 EXAMINATION BY MS. ROESER:

12 Q. Mr. Alexander, you testified
13 earlier with respect to a conversation in a
14 car ride with Mr. Baldoni when he said
15 something to the effect of that he forced
16 himself on women. Do you recall that
17 testimony?

18 A. Yes.

19 Q. Do you recall Mr. Baldoni also
20 sharing during that car ride something to
21 the effect of he would force himself on
22 women even when they said no or did not
23 consent?

24 A. Yes.

25 Q. Mr. Baldoni's statements during

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2 that car ride, you found them disturbing,
3 right?

4 MR. SCHUSTER: Objection.

5 A. Yes.

6 Q. You testified this morning that
7 you found Mr. Baldoni's statements in the
8 car ride disturbing?

9 A. Yes.

10 Q. Why?

11 A. Who talks like that on your
12 first car ride meeting somebody when other
13 people are present? That's why I can't
14 forget that conversation. Very out of the
15 ordinary.

16 Q. You found it out of the
17 ordinary for Mr. Baldoni to discuss forcing
18 himself on women when they did not consent?

19 MR. SCHUSTER: Objection.

20 A. Yes, and sexual comments that
21 were passed inside a vehicle with other
22 women.

23 Q. You testified also that you
24 expressed to Ms. Lively that you did not
25 want her to be alone with Mr. Baldoni; is

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2 that right?

3 A. Yes.

4 Q. And was that true to what you
5 were feeling at the time?

6 A. Yes.

7 Q. Why didn't you want Ms. Lively
8 to be alone with Mr. Baldoni?

9 A. Due to the conversation in the
10 vehicle, the stuff he spoke about, you
11 know, sexual relations, forcing himself on
12 women, no consent, or he didn't give
13 consent for a woman to force it on him.
14 It's disturbing to me when you are first
15 meeting someone and it just stuck out and
16 that's why I stated what I stated.

17 Q. You stated it was disturbing to
18 you when you first meet somebody. Did you
19 also find it disturbing that Mr. Baldoni
20 would speak about forcing himself on women
21 without consent to Ms. Lively at any time
22 even if it wasn't their first meeting?

23 MR. SCHUSTER: Objection.

24 A. Repeat that.

25 Q. Would you find it appropriate

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2 for Mr. Baldoni to speak about forcing
3 himself on women without consent --
4 A. No.
5 Q. -- to Ms. Lively even if it
6 wasn't the first time they met?

7 MR. SCHUSTER: Objection.
8 A. No.
9 MS. ROESER: Nothing further.
10 MR. SCHUSTER: I have a few
11 follow-ups. I'm sorry.

12 EXAMINATION BY MR. SCHUSTER:

13 Q. You said it was the first car
14 ride. Do you know if this was the first
15 interaction between Blake Lively and Justin
16 Baldoni or was it your first interaction
17 with Justin Baldoni?

18 A. It is my first, and I don't
19 recall if they were before the fact.

20 Q. I know you didn't read the
21 book, but at that time did you have any
22 understanding of what this movie was about?

23 A. No.

24 Q. Did you have any understanding
25 that it was about domestic violence?

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2 take following that car ride to ensure that
3 Blake Lively would not be alone with Justin
4 Baldoni?

5 MS. ROESER: Objection.

6 A. Repeat the question.

7 Q. Sure. You said that you did
8 not want Ms. Lively to be alone with
9 Mr. Baldoni going forward after the car
10 ride, correct?

11 A. Correct.

12 MS. ROESER: Objection.

13 Q. What, if anything, did you do
14 to ensure that Ms. Lively would not be
15 alone with Mr. Baldoni going forward?

16 MS. ROESER: Objection.

17 A. I don't recall.

18 Q. Did you consider yourself a
19 driver, a driver/security, or something
20 else?

21 MS. ROESER: Objection.

22 A. A driver/security.

23 Q. And as you sit here today,
24 those are the words you recall Mr. Baldoni
25 using, that he forced himself on other

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2 women without consent?

3 A. Yes.

4 Q. Anything else you can recall
5 specifically that Mr. Baldoni said in that
6 car ride?

7 A. He had women force themselves
8 on him as well without consent, that was
9 part of the car ride, a back and forth
10 scenario.

11 Q. And did you hear any context
12 for why he brought this up?

13 MS. ROESER: Objection.

14 A. Not that I know of.

15 MR. SCHUSTER: Okay. Thank
16 you, sir.

17 MS. ROESER: Off the record.

18 (Continued on the next page.)

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1
2 CERTIFICATION
34 I, TODD DeSIMONE, a Notary Public for
5 and within the State of New York, do hereby
6 certify:7 That the witness whose testimony as
8 herein set forth, was duly sworn by me; and
9 that the within transcript is a true record
10 of the testimony given by said witness.11 I further certify that I am not related
12 to any of the parties to this action by
13 blood or marriage, and that I am in no way
14 interested in the outcome of this matter.15 IN WITNESS WHEREOF, I have hereunto set
16 my hand this 30th day of September, 2025.
1718 19 TODD DESIMONE
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