

Exhibit 34

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,)
Plaintiff,)
v.)
CASE NO.)
1:24-CV-10049-LJL)
WAYFARER STUDIOS LLC, a)
Delaware Limited Liability)
Company, JUSTIN BALDONI, an)
individual, JAMEY HEATH, an)
individual, STEVE SAROWITZ, an)
individual, IT ENDS WITH US)
MOVIE LLC, a California)
Limited Liability Company,)
MELISSA NATHAN, an individual,)
THE AGENCY GROUP PR LLC, a)
Delaware Limited Liability)
Company, JENNIFER ABEL, an)
individual, JED WALLACE, an)
individual, and STREET)
RELATIONS INC., a California)
Corporation,)
Defendants.)

CONFIDENTIAL

ATTORNEY'S EYES ONLY

VIDEOTAPED DEPOSITION OF

WARREN ZAVALA

THURSDAY, SEPTEMBER 18, 2025

LOS ANGELES, CALIFORNIA

PAGES 1 - 303

REPORTED BY MARK SCHWEITZER

CSR #10514, RPR, CRR

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Transcript of Warren Zavala

Conducted on September 18, 2025

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1	messages were not very complimentary?	01:44:44
2	MS. LEADER: Objection to form.	01:44:47
3	THE WITNESS: That is absolutely not true.	01:44:48
4	Q. BY MS. GAROFALO: Okay. Okay. Now, before	01:45:02
5	filming resumed, let's mark -- I think we're up to --	01:45:04
6	we at 5 or 6?	01:45:10
7	MS. LEADER: 5.	01:45:11
8	MS. GAROFALO: 5 -- as Exhibit 5, a	01:45:13
9	document Bates stamped Heath 45307 through 45311.	01:45:14
10	(Exhibit 5 for identification.)	01:45:20
11	THE WITNESS: Blakel.	01:46:02
12	Q. BY MS. GAROFALO: And you'd anticipated my	01:46:05
13	first question. Does this document refresh your	01:46:05
14	recollection as to what BLAKEL is?	01:46:07
15	A. Yeah, I just figured it out. It's her --	01:46:09
16	the name of her loan-out.	01:46:13
17	Q. Okay. And take a minute to look at this	01:46:21
18	document beginning on the -- you know what? Someone	01:46:23
19	didn't copy this correctly.	01:46:31
20	Okay. I'm sorry. It's been a long day.	01:46:37
21	On the first page of the document, there's a list	01:46:39
22	starting with 1 that continues on the next two pages.	01:46:41
23	Do you see that?	01:46:44
24	A. Yes.	01:46:45
25	Q. Just without sitting here and reading it	01:46:45

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1	carefully, can you tell us if you have any	01:46:49
2	understanding as to what that list is?	01:46:51
3	A. Is this the return to work?	01:46:59
4	Q. Just take a minute to look at the	01:47:05
5	document --	01:47:07
6	MS. LEADER: Take a minute. Yeah -- right.	01:47:08
7	THE WITNESS: Okay.	01:48:31
8	Q. BY MS. GAROFALO: Okay.	01:48:32
9	Do you recognize the list?	01:48:33
10	A. Yes, I've seen it before.	01:48:33
11	Q. What is it?	01:48:35
12	A. It's the return to work.	01:48:35
13	Q. What does that mean?	01:48:36
14	A. It's what was presented for her to be able	01:48:37
15	to return to work and finish the movie.	01:48:46
16	Q. Okay. This is a list that was presented to	01:48:48
17	Wayfarer as a condition of Ms. Lively returning to	01:48:51
18	complete the movie. Is that a correct statement?	01:48:58
19	A. Yes.	01:49:01
20	MR. BRUNO: Objection to form.	01:49:02
21	Q. BY MS. GAROFALO: And if -- if you know,	01:49:06
22	was Ms. Lively refusing to return to work on the	01:49:07
23	movie if Wayfarer did not agree to this list?	01:49:11
24	A. That's my understanding. I -- I wasn't a	01:49:16
25	party to the drafting of this or the presentation of	01:49:18

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1	Simple Favor?	06:26:42
2	A. Yes, the Simple Favor thing was a sequel,	06:26:42
3	and it was also a streaming deal. So I'd like to get	06:26:44
4	a theatrical deal in the same zone, if not more,	06:26:47
5	would be my hope. And get her to a better place	06:26:50
6	financially.	06:26:56
7	Q. Okay. And you testified that there were no	06:26:56
8	offers after It Ends With Us.	06:27:01
9	A. No meaningful or real offers, correct.	06:27:03
10	Q. And you qualified it by saying,	06:27:05
11	"meaningful." What do you mean by that?	06:27:10
12	A. Anybody can send a script that is remotely	06:27:11
13	in the business who wants to put together a project.	06:27:14
14	It doesn't mean they have the money to finance it or	06:27:16
15	make a bona fide offer or have a start date or have	06:27:19
16	distribution. So a meaningful offer, in my mind,	06:27:22
17	would be something that is either financed or has a	06:27:24
18	distributor or has an element involved that is	06:27:28
19	meaningful enough where you would -- you know, the	06:27:32
20	movie's gonna get done without her attaching herself	06:27:33
21	to it.	06:27:36
22	Q. Okay. And have you noticed there being	06:27:37
23	just generally less interest in Ms. Lively in films?	06:27:40
24	A. Yes.	06:27:43
25	Q. Okay.	06:27:43

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1 STATE OF CALIFORNIA.)
2)
3 COUNTY OF LOS ANGELES)

4 I, Mark Schweitzer, Certified
5 Shorthand Reporter No. 10514, do hereby
6 Certify:

7 That prior to being examined, the witness
8 named in the foregoing deposition was by me duly
9 sworn to testify the truth, the whole truth, and
10 nothing but the truth;

11 That said deposition was taken down by me
12 in shorthand and thereafter reduced to print by
13 means of computer-aided transcription; and the same
14 is a true, correct, and complete transcript of said
15 proceedings.

16 I further certify that I am not interested in
17 the outcome of the action.

18 Witness my hand this 19th day of September,
19 2025.

20 
21

22 MARK SCHWEITZER, CSR #10514, RPR, CRR
23 Certified Shorthand Reporter
24 In and for the State of California
25