

Exhibit 34

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3

4 BLAKE LIVELY,)
5 Plaintiff,)
6)
7 v.)
8) CASE NO.
9 WAYFARER STUDIOS LLC, a) 1:24-CV-10049-LJL
10 Delaware Limited Liability)
11 Company, JUSTIN BALDONI, an)
12 individual, JAMEY HEATH, an)
13 individual, STEVE SAROWITZ, an)
14 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.)
-----)

16

17 CONFIDENTIAL

18 ATTORNEY'S EYES ONLY

19 VIDEOTAPED DEPOSITION OF

20 WARREN ZAVALA

21 THURSDAY, SEPTEMBER 18, 2025

22 LOS ANGELES, CALIFORNIA

23 PAGES 1 - 303

24 REPORTED BY MARK SCHWEITZER

25 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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| | | |
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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)
2 COUNTY OF LOS ANGELES)

3
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