

# Exhibit 52

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14 WAYFARER STUDIOS LLC, et al.  
15 vs.  
16 BLAKE LIVELY, et al.  
17  
18 Consolidated Plaintiffs,  
19  
20 Consolidated Defendants.

20                   VIDEO-RECORDED DEPOSITION OF JENNIFER ABEL  
21                   Los Angeles, California  
22                   Friday, September 26, 2025  
23                   Stenographically Reported by: Ashley Soevyn,  
                          CALIFORNIA CSR No. 12019

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1 like the -- you know, you don't like the person's  
2 past or their history or their reputation?

3 MR. FREEDMAN: Objection.

4 THE WITNESS: I think to better answer  
5 your question, as a personal publicist, I'm able to  
6 make decisions based on who I think I'm able to  
7 represent based on my aligning values.

8 BY MR. GOTTLIEB:

9 Q Okay. Do you typically do like a  
10 background investigation or look into your clients  
11 when you have new opportunities presented to you?

12 A I think the extent of my ability to do a  
13 background investigation is to Google. I'm sure  
14 I've done that in the past.

15 Q Okay. When did you first meet  
16 Justin Baldoni?

17 A In 2020.

18 Q What were the circumstances in which you  
19 met him?

20 A I became his publicist and started  
21 running his account.

22 Q How did that come about?

23 A When I was employed at Jonesworks, I was  
24 hired to oversee the entire talent and entertainment  
25 department, and he was a talent client at that time.

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1 Q Okay. Do you remember when in 2020 this  
2 was?

3 A I believe I was hired at the end of  
4 July 2020. So it would have been sometime around  
5 that time period.

6 Q And were -- were you introduced to  
7 Mr. Baldoni through someone at Jonesworks or how --  
8 how did that come about?

9 A I'm trying to remember -- I apologize --  
10 the first time that I met him. I believe there was  
11 a photo shoot and I came to set, and that was the  
12 first time that we met. But again, I'm -- it's a  
13 long time ago so I'd have to think more about that,  
14 and I can correct that later.

15 Q Do you remember where that was?

16 A I do not. Sorry.

17 Q Did you meet anybody else at Wayfarer  
18 Studios when you were brought in, in 2020 to work  
19 with Mr. Baldoni?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: So I don't recall the exact  
22 date of when I was introduced to the Wayfarer team.  
23 Yeah, I apologize. I don't recall the exact date.

24 BY MR. GOTTLIEB:

25 Q At that time in 2020, were you

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1 to oversee Justin and the Wayfarer account, I was  
2 aware that Steve Sarowitz was the founder.

3 Q Okay. Did you have any understanding of  
4 who paid the bills for this account?

5 A No.

6 Q Who else worked with you -- and we'll  
7 have to take this in -- in chunks, so let's say 2020  
8 through -- well, just strike that.

9 By the time we get to 2023, January of  
10 2023, who else worked with you on the Baldoni  
11 Wayfarer account at Jonesworks?

12 A Sure. So in 2023 -- would you like me to  
13 name the employees?

14 Q Please.

15 A Matthew Mitchell, Matthew Gibson, Audrey  
16 Hixon, Ande Bowser. We had brought on a digital  
17 team at that time to work with Justin, so that  
18 included James Knobloch, Henry Hargitai, Nate Woldu,  
19 was a videographer. And as I mentioned before,  
20 Raquel Harris was tapped into very briefly for about  
21 a month or so of that time.

22 Q Thank you. That's very helpful.

23 Were any of those people --

24 A Oh, and -- I'm so sorry.

25 Q No, go ahead.

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1 Q When do you recall -- was there a point  
2 in time that you can recall, as you sit here today  
3 without looking back through documents, Mr. Baldoni  
4 deciding that he wanted his social media feed to  
5 exclusively focus on issues of domestic violence?

6 A Yes.

7 Q When was that?

8 A In that August time frame.

9 Q Do you remember what day?

10 A I don't recall.

11 Q Okay. If I told you it was around  
12 August 8th, would that sound right to you?

13 A I will take your word for it. It was  
14 around that time.

15 Q Do you have a recollection of whether  
16 that was after the premiere or before it?

17 A That was after the premiere, before the  
18 release.

19 Q Okay. And do you have that recollection  
20 only because I said August 8th, or because you  
21 actually remember it was after the premiere that he  
22 decided that he wanted to start focusing on domestic  
23 violence?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: You said August 8. The

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1 BY MR. GOTTLIEB:

2 Q Ms. Abel, you're being handed what's been  
3 marked as Exhibit 47, which is a document bearing  
4 the Bates No. 16763 through 16768. And I'm only  
5 asking you about the itinerary that you'll find on  
6 the last page, not asking you anything about the  
7 voluminous email traffic that gets to it.

8 A Okay.

9 Q Ms. Abel, one of the earliest press  
10 events for this film was a trailer watch event on  
11 May 6th, 2024; is that correct?

12 A Yes.

13 Q Did you attend that event?

14 A I did.

15 Q Do you recall it?

16 A Vaguely. But yes, I do.

17 Q Do you see a reference at the top of the  
18 page marked 16768, the last page of this document,  
19 referencing that there would be 70 to 80 creators,  
20 influencers or media members present?

21 A Yes.

22 Q Did Mr. Baldoni give an interview at this  
23 event?

24 A It was a roundtable discussion paired  
25 with Colleen Hoover.

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1 Q Was this referred to as a EPK interview  
2 or something like that?

3 A I can't recall if this was the same day  
4 that we did the interview with Entertainment Tonight  
5 prior to this when both -- when Justin and Colleen  
6 were together. I don't see that that's noted on  
7 here.

8 Q Okay. Do you have any recollection of  
9 the kinds of creators or influencers that were  
10 invited to this event?

11 A I don't know how they were selected, no.

12 Q Do you have any idea whether some of them  
13 were people who are familiar with the book or had  
14 covered the book? Was there any -- was there any  
15 interest in getting people like that at this event?

16 A I did not participate in getting people  
17 to this event.

18 Q Okay. Was this -- who was this event  
19 planned by? Was it planned by Sony, Wayfarer, both  
20 collaboratively?

21 A Sony.

22 Q Did Wayfarer or Mr. Baldoni object to  
23 this event?

24 A Object to it, no.

25 Q Did Wayfarer or Mr. Baldoni express any

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1 concerns prior to this event that you can recall?

2 A No, not that I can recall.

3 Q Did Mr. Baldoni ever tell you he didn't  
4 want to attend this event?

5 A Not that I can recall.

6 Q This event involved, as you can see, a  
7 teamed reception for influencers at 3:00 o'clock  
8 p.m. and a floral arranging demonstration with a  
9 floralist and Colleen Hoover and Justin Baldoni.

10 Do you see that?

11 A Yes, following the roundtable discussion.

12 Q And fans are welcome to bring their  
13 bouquets for photos at 3:45 p.m.

14 Do you see that?

15 A Yes.

16 Q Was there a social media backlash to this  
17 event?

18 A I don't recall.

19 Q You have any recollection of any kind of  
20 negative reaction to selling It Ends with Us with  
21 floral-themed events where bouquets of flowers were  
22 made?

23 A Not that I can recall.

24 Q You were never asked to respond to or  
25 address anyone that you can remember, as you sit

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1 (As read) :

2 "She doesn't like how much we lean into  
3 the domestic abuse storylines, but you  
4 know that and it's about finding a  
5 balance"?

6 A Yes.

7 Q You had previously communicated to  
8 Mr. Baldoni that Sony did not like how much he had  
9 leaned into the domestic abuse storylines?

10 A Yes.

11 Q Mr. Baldoni responds at 8:54:

12 (As read) :

13 "Yeah, maybe some slack can be given  
14 considering the terrorist attack  
15 concurrently happening lol."

16 Do you see that?

17 A Yes.

18 Q Did you understand what he was referring  
19 to when he referenced a "terrorist attack"?

20 A I'd have to recall world events happening  
21 on or around the state. I apologize. Not in this  
22 moment.

23 Q As you sit here today, you have no  
24 recollection at all of whether he was referencing a  
25 literal terrorist attack or a figurative one?

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Terrorist -- I -- I don't  
3 recall.

4 BY MR. GOTTLIEB:

5 Q Do you have any understanding at all why  
6 he was asking for some slack?

7 MR. FREEDMAN: Objection.

8 THE WITNESS: I don't recall.

9 BY MR. GOTTLIEB:

10 Q Did you ever receive written feedback  
11 from Sony on the EPK interview?

12 A Yes.

13 Q And did you share that feedback with  
14 Mr. Baldoni?

15 A Yes.

16 Q Do you have a recollection -- we'll start  
17 at a high level and then see how much you remember.  
18 Do you have a level -- a recollection at a high  
19 level of what the gist of Sony's messaging to  
20 Mr. Baldoni was?

21 A The gist "high level" was that he spoke  
22 too much about the domestic abuse survivor community  
23 and as that was why he wanted to make the film.

24 Q And they wanted a lighter focus in the  
25 marketing?

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1           A     I believe that was part of the feedback  
2     they were given. It was a lengthy email, if I can  
3     recall. I don't recall the full email.

4           Q     They gave lengthy feedback on what to  
5     emphasize and what to avoid in marketing the film?

6           A     Are you referring to that specific email  
7     or just in general?

8           Q     Around this time, did -- did Sony give  
9     lengthy feedback in writing that you reviewed about  
10    how to market the film?

11           MR. FREEDMAN: Objection.

12           THE WITNESS: Feedback in context to how  
13    Justin was answering his EPK interviews.

14    BY MR. GOTTLIEB:

15           Q     Okay. Do you recall -- do you recall  
16    Sony saying that the main point they wanted  
17    Mr. Baldoni to hit was that this is an entertaining  
18    blockbuster film, movie of the summer that everyone  
19    will enjoy regardless of their own experiences, or  
20    lack thereof, with abuse?

21           A     I would have to review the specific  
22    language that they used. It's been a while.

23           Q     Okay. Do you have any recollection of  
24    saying that you agreed with Sony's point of view?

25           A     Yes, and about finding a balance.

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1       Mr. Baldoni on social media; is that right?

2           A     In reference to that communication on  
3     August 5th that we're discussing specifically,  
4     yes, that's what I recall.

5           Q     And the idea was that this language --

6           A     Uh-huh.

7           Q     -- which we'll get to. This language was  
8     something Mr. Baldoni could say in the press that  
9     would -- I think the word used was "normalize" --

10          A     Uh-huh.

11          Q     -- the unfollowing of him on social  
12     media; is that right?

13          A     Not normalizing the act, but normalizing  
14     and de-sensationalizing any social media commentary  
15     surrounding fans picking up on that fact.

16          Q     Okay. So that was a deliberate strategy  
17     of how to place this language or concept into one of  
18     Mr. Baldoni's statements in order to defend against  
19     or alter a narrative that you all saw emerging in  
20     social media; is that what you just said?

21          A     No, I don't agree with that  
22     characterization.

23          Q     What don't you agree about with it?

24          A     That language was provided as guidance.  
25     It was not with the intention, in your words, to

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1 provide guidance to my client of how he can still be  
2 authentic in his messaging, and yet, again, kind of  
3 be desensationalized, should that narrative take  
4 hold and cross over into traditional media.

5 Q And so if I'm understanding you, one of  
6 the benefits of getting ahead of the narrative by  
7 making some kind of a statement, is that if the  
8 narrative later comes out, you can point back to  
9 whatever the thing is that the client has said, and  
10 said, we already said that, see?

11 A It desensationalizes it.

12 Q It's not new?

13 A It's not new; it's not exciting.

14 Q We talked about that already. You don't  
15 need to cover it.

16 A Exactly. It desensationalizes it.

17 Q Okay. You're aware, though, that Sony  
18 disagreed that using the word "fiction" [sic] would  
19 desensationalize what was happening, right?

20 A Friction. Kimberly Wire, who was in the  
21 interviews with me, I believe had messaged me and  
22 said that she didn't -- she kind of caught that word  
23 and flagged it for me.

24 Q And she, in fact, said:

25 (As read):

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1 this way. Actually, keep that one. Keep these two  
2 handy.

3 THE WITNESS: Okay.

4 MR. GOTTLIEB: The last two.

5 This is Exhibit 54.

6 Am I right on my numbering here?

7 (Exhibit 54 marked for identification.)

8 THE STENOGRAPHIC REPORTER: Yes, you are.

9 MR. GOTTLIEB: It's a miracle. Okay.

10 BY MR. GOTTLIEB:

11 Q So Exhibit 54 is a document bearing the  
12 Bates range 14980 to 14982. And this one, I  
13 believe, is a text exchange between you and  
14 Mr. Baldoni; is that right?

15 A Oh, I'm sorry, which -- no, this one is  
16 between -- yes, it is between me and Justin. Yes,  
17 thank you.

18 Q And this is on August 5th; is that right?

19 A Yes.

20 Q And the first message there is 10:42 a.m.

21 Do you see that?

22 A Yes.

23 Q So this is when you were communicating to  
24 Mr. Baldoni the feedback that Ms. Wire had given to  
25 you about trying to not use the word "friction"?

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1           A     Yes.

2           Q     Are so does this refresh your  
3     recollection that you gave that advice to him by  
4     text message rather than in person?

5           A     I did both.

6           Q     Okay. So you say to him here:

7                   (As read) :

8                   "Sony is having a hard time with the  
9                   word 'friction.' They think it will be  
10                  taken out as clickbait. They obviously  
11                  don't know about our strategy, but  
12                  let's stick to the words of  
13                  'challenge.'"

14                  And then you continue.

15           A     Correct.

16           Q     Did he shift to the word "challenge"  
17     after this?

18           A     He did.

19           Q     What was your strategy that you were  
20     referring to that Sony did not know about?

21           A     About providing guidance to  
22     desensationalize what we anticipated at that time.  
23     The social media commentary picking up on the fact  
24     that the cast had unfollowed him, and he was not  
25     present in any of the marketing materials with the

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1 cast.

2 Q Okay.

3 It looks like about 90 minutes later, he  
4 sends you an image, a screenshot, that says, "This  
5 is what we would need."

6 A Uh-huh.

7 Q We're going to -- I'm going to come back  
8 to a few questions about this later, but what  
9 happened between 10:42 and 12:06 that prompted  
10 Mr. Baldoni to send this image to you on August 6th?

11 MR. FREEDMAN: Objection.

12 THE WITNESS: I have to look at the  
13 timing of the other documents. I'm not sure if we  
14 were still in press at that time or what.

15 BY MR. GOTTLIEB:

16 Q Okay. And then you make a comment right  
17 after he sends the screenshot to you that says --  
18 and he says:

19 (As read):

20 "This is what we would need."

21 And you respond:

22 (As read):

23 "Yes. I literally just spoke to  
24 Melissa about this on the break about  
25 what we discussed last night for social

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1 email from Danni Maggin to Jacob Johnson, copying  
2 Gloria Hann and Danielle Misher.

3 Who is Danni Maggin?

4 A Sony publicity.

5 Q And were you in contact with Danni Maggin  
6 around this time, around August 5th?

7 A Yes.

8 Q Talking about press about -- around the  
9 release of the film?

10 A Yes.

11 Q Does Ms. Maggin here reference the Dallas  
12 Morning News interview that we were just discussing?

13 A Yes. I haven't seen this document  
14 before, so I'm just going to read it.

15 Okay.

16 Q Do you see that Ms. Maggin is saying that  
17 Josh said Mr. Baldoni shouldn't do any more press  
18 after this?

19 A Yes.

20 MR. FREEDMAN: Object.

21 BY MR. GOTTLIEB:

22 Q Who is Josh a reference to?

23 A Josh Greenstein.

24 Q And who is that?

25 A I don't know his exact title, but I

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Not that I can recall.

3 BY MR. GOTTLIEB:

4 Q Did Mr. Baldoni ever tell you that  
5 because of his neurodivergence, he sometimes says  
6 awkward things or impulsive things that he later  
7 regrets saying?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: He e-mailed or texted or  
10 emailed, I don't remember the method, in relation to  
11 a podcast interview that he was asking if he should  
12 do.

13 BY MR. GOTTLIEB:

14 Q Did you have any concerns about that when  
15 he was approaching press for this film?

16 A Concerns about what? Sorry.

17 Q Impulsive speech or an inability to stay  
18 on message?

19 A No.

20 Q Okay.

21 Jonesworks had -- we talked about before,  
22 its contract -- oh, sorry. Just one more thing  
23 about the Dallas Morning News interview. That never  
24 ran, right?

25 A No, not to my knowledge, no.

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1 Q Sony was basically able to kill it?

2 A We pulled the tape.

3 Q And how did you do that?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: In that setting, in a press  
6 junket, it is typically -- you have one camera  
7 operator. They are rolling tape for all of the  
8 interviews, and then you hand the tape of the  
9 segment to the reporter. I wasn't part of that  
10 facilitation, but it was my understanding that it  
11 was in our control, and we had the ability to pull  
12 the tape.

13 BY MR. GOTTLIEB:

14 Q Okay. Let's shift to social media. We  
15 talked before about Jonesworks. I think you  
16 described it as "a significant amount of work." At  
17 this time, it was going into Mr. Baldoni's social  
18 immediate profile; is that right?

19 A Yes.

20 Q And is it fair to say there were times  
21 when you would go through multiple drafts and text  
22 with particular message that Mr. Baldoni would post  
23 on his Instagram feed?

24 A Yes.

25 Q And I'll ask you this because I think

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1 you'll otherwise say it, but that's typical for  
2 clients that you had advised in the social media  
3 space; is that right?

4 A That is typical, yes.

5 Q So the social media post -- now back to  
6 Mr. Baldoni, the social media post that he was  
7 putting out on his Instagram page are during this  
8 period of time, particular ones that are being  
9 vetted through and edited by the social media team,  
10 right?

11 A Yes, the Jonesworks social media team,  
12 yes.

13 Q Okay. Were there times that this -- that  
14 you found this tedious?

15 A Yes.

16 Q Were there times that you felt like the  
17 social media posts were overly curated?

18 A I'm sure I provided that feedback.

19 Q Maybe there was a bit more debate and  
20 discussion on the precise wording of social posts  
21 than you thought necessary?

22 A I'm sure, yes.

23 Q But what Mr. Baldoni's followers saw was  
24 not any of that, or the debate, or the multiple  
25 drafts, but instead the final product that went out

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1 at least according to Mr. Baldoni, from your flight  
2 to Chicago, right?

3 A Yes.

4 Q And this is at the same time that you get  
5 a text chain going about who was responsible for the  
6 leak to the Daily Mail, right?

7 A Yes.

8 Q And as soon as Mr. Baldoni lands, he  
9 sends this message and says:

10 (As read) :

11 "What is the TikTok strategy? I would  
12 like you guys to start posting me ONLY  
13 talking about domestic violence and  
14 clips and why this movie is so  
15 important."

16 Do you see that?

17 A Yes.

18 Q And then there's a discussion after that.  
19 So to level set this instruction that came from  
20 Mr. Baldoni to the social team, is it something that  
21 the social team worked to implement?

22 A In -- in terms of cutting and providing  
23 content of him talking about DV and clips and why  
24 the movie is so important to him?

25 Q Yes.

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1           A     Yes.

2           Q     And he changed his profile and handle on  
3 Instagram at some point in time?

4           A     He put his bio to No More, with a link to  
5 for resources.

6           Q     And at first, you actually advise, don't  
7 do that, it's too soon, right. "Too drastic too  
8 soon," at 4:16 p.m.?

9           A     Oh, I think that it's because I didn't  
10 want to lose his link tree.

11          Q     I see. So this is after the interview  
12 with the word "friction," right?

13          A     Yes.

14          Q     And we're now on the 8th, and so there  
15 are now stories that are starting to be in the works  
16 using the word, or the concept, of a "feud," right;  
17 that's what the Daily Mail story was about?

18          A     Yes. To the best of my recollection,  
19 that was.

20          Q     And this was around the time that you all  
21 were starting to see the commentary on social media  
22 spill over into media-media, right?

23                    MR. FREEDMAN: Objection.

24                    THE WITNESS: Just for clarity, if I  
25 recall correctly, it was starting to spill over

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1                   "Agreed. It's horrible. We'll dig in  
2                   for details on her indiscretions."

3                   And then there's some emojis there,  
4                   right?

5                   A     Yes.

6                   Q     And you don't respond to that in words,  
7                   but you "heart" that or "love" that, right?

8                   A     Yes.

9                   Q     Did Mr. Mitchell prepare such a whatever,  
10                   this arsenal of stuff on Ms. Lively's indiscretions?

11                   MR. FREEDMAN: Objection.

12                   THE WITNESS: Not -- not that I'm aware  
13                   of.

14                   BY MR. GOTTLIEB:

15                   Q     Who first suggested the hiring of  
16                   Melissa Nathan and TAG on the Wayfarer -- Baldoni  
17                   account?

18                   A     Melissa was one of my crisis  
19                   recommendations.

20                   Q     Okay. And I think you testified  
21                   yesterday that you had given a few names?

22                   A     Multiple.

23                   Q     And you -- did you recommend Ms. Nathan?  
24                   Not in the sense of, you must hire this person, but,  
25                   this would be a good person to work with, to

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1 Q Are you aware of whether she had phone  
2 calls with her around this period of time?

3 A I do not know.

4 Q Would you be upset if you learned that  
5 Ms. Nathan had been having phone conversations with  
6 the editor of the Daily Mail arming them with  
7 information about a piece that could be written  
8 about Ms. Lively around this time?

9 A No. She's telling me that she's in  
10 conversations:

11 (As read) :

12 "Off record spoke to the editor at  
13 Daily Mail because she's my friend."

14 Q When a reporter gets something off the  
15 record, are there different rules that reporter --  
16 certain reporters follow for what off the record  
17 means or is it uniform across all media?

18 A Off the record is generally uniform.

19 Q Off the record means can't be quoted,  
20 right?

21 A Correct.

22 Q Can't be used as a background?

23 A Correct.

24 Q Are there some reporters that take a  
25 different view as to whether they can use

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1 off-the-record information to chase leads on  
2 stories?

3 A I'm not a reporter. I don't know.

4 Q What is your understanding of when you  
5 give something off the record to a reporter? What  
6 are they -- what are they allowed to do with that  
7 information?

8 MR. FREEDMAN: Objection.

9 BY MR. GOTTLIEB:

10 Q In your understanding.

11 A Sure. I can just speak to my experience.  
12 When I give something off the record to a reporter,  
13 it is so they have a better understanding of the  
14 context. However, they cannot use anything related  
15 to that context. It's for comprehension purposes.

16 Q Are they allowed to, for example, if you  
17 gave information -- if you gave a link to a reporter  
18 off the record, a link to an article or a social  
19 media post or whatever, would they be allowed to go  
20 read that article or go read the social media post?

21 MR. FREEDMAN: Objection.

22 THE WITNESS: Absolutely. Off the record  
23 is for publication purposes.

24 BY MR. GOTTLIEB:

25 Q Okay. I think we understand each other.

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1 MR. FREEDMAN: Objection.

2 BY MR. GOTTLIEB:

3 Q Per this email chain?

4 A Or at any time. It just says "we'll  
5 connect with you directly on this."

6 Q Okay. How did you understand Jed and his  
7 team to be absolute magicians, if at all?

8 MR. GLOVER: Objection to form.

9 MR. FREEDMAN: Objection.

10 THE WITNESS: It sounds like Katie is  
11 hyping them up. I just -- yeah. Make them feel  
12 good.

13 BY MR. GOTTLIEB:

14 Q Getting excited about their services?

15 A Sounds like it's just puffery, making  
16 them feel good.

17 Q Okay.

18 MR. GOTTLIEB: Ms. Abel, you're being  
19 handed --

20 THE STENOGRAPHIC REPORTER: Exhibit 68.

21 (Exhibit 68 marked for identification.)

22 MR. GOTTLIEB: A document that's been  
23 marked as Exhibit 68. It's a text chain with the  
24 Bates Nos. JONESWORKS 13830 through 13831. This is  
25 an August 11th, 2024 text chain involving

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1       yourself, Mr. Heath, and Mitz Toskovic.

2       BY MR. GOTTLIEB:

3           Q     Let me know when you've had a chance to  
4       look at that.

5           A     Yes. Okay.

6           Q     Ms. Toskovic is telling you at 6:45 p.m.  
7       that Mr. Baldoni is the only one from the cast  
8       posting anything at the moment; is that right?

9           A     Yes.

10          Q     And that:

11               (As read) :

12               "Fans are going ham on Blake, Jenny and  
13               Colleen's comment sections."

14               Do you see that?

15          A     Yes.

16          Q     Do you see where he says "Colleen went  
17       private from all the hate"?

18          A     Yes.

19          Q     And -- and she writes that she's worried  
20       that:

21               (As read) :

22               "Another post from Justin about DV and  
23               thanking women everywhere might further  
24               fuel the fire."

25               Do you see that?

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1 A Yes.

2 Q And you reply a few minutes later that:

3 (As read):

4 "That's valid thought. But I'm also  
5 thinking of the next wave of press for  
6 Monday and news cycle and if there is  
7 anymore pickup of those articles in a  
8 post like this would further combat the  
9 negative. Plus, since they're  
10 releasing the podcast tomorrow, it  
11 further instates that he's in Sweden  
12 even though it says in the episode, but  
13 people are dumb." Emoji.

14 Do you see that?

15 A Yes, I do.

16 Q And Mr. Heath, after listening or reading  
17 this, says "stay the course," right?

18 A Yes.

19 Q So did you understand that Ms. Toskovic  
20 was concerned that further posts from Mr. Baldoni  
21 could just fuel more hateful messages towards the  
22 women in the cast?

23 A I believe she was concerned at the  
24 discrepancy, the fact that no one else from the cast  
25 was posting and supporting the film, and fans were

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1 viewing that as negative. And Justin was. Justin  
2 was incredibly supportive of this film and everyone  
3 in it.

4 Q And the result of that negative view that  
5 you described is that fans were attacking  
6 Ms. Lively, Ms. Slate, and Ms. Hoover on social  
7 media, right?

8 MR. FREEDMAN: Objection.

9 THE WITNESS: Social media was attacking  
10 everyone, specifically resulting from people's  
11 actions during the promotion of this tour.

12 BY MR. GOTTLIEB:

13 Q My question was just about --

14 A Sure.

15 Q -- what you understood Ms. Toskovic to be  
16 communicating to you. And what she says is that  
17 "fans are going ham on Blake, Jenny and Colleen's  
18 comment section." Right?

19 A Yes.

20 MR. FREEDMAN: Objection.

21 BY MR. GOTTLIEB:

22 Q So you understood at this point in time,  
23 that the hate or the negative reaction -- or  
24 Ms. Toskovic describes it as hate -- is being  
25 directed not just at Ms. Lively, but also at

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1 Ms. Slate and Ms. Hoover, right?

2 A Yes. And the hate was resulting from  
3 their participation in the promotion of the -- of  
4 the film.

5 MR. GOTTLIEB: Move to strike as  
6 nonresponsive.

7 BY MR. GOTTLIEB:

8 Q Ms. Abel, I didn't ask you for why you  
9 thought -- or how you thought the hate arose.

10 A Oh, sorry. I was clarifying what the  
11 hate was. Sorry.

12 Q You understood that there was hate online  
13 directed at Ms. Lively, Ms. Slate, and Ms. Hoover,  
14 right?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: Yes.

17 BY MR. GOTTLIEB:

18 Q And what Ms. Toskovic is saying here is:

19 (As read):

20 "Maybe we should hold off further posts  
21 about domestic violence for Justin  
22 because I'm concerned that that might  
23 fuel the fire that we're already  
24 seeing."

25 A Yes, because --

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1 Q And you --

2 A Let me finish, please. Because Blake,  
3 Jenny and Colleen were not posting anything or  
4 communicating anything regarding the domestic  
5 violence community.

6 Q And you and Mr. Heath say "stay the  
7 course," right?

8 A Yes.

9 MR. GOTTLIEB: Ms. Abel, I'm handing you  
10 what has been marked as Exhibit 69. This is a text  
11 chain between you and Ms. Nathan on August 12th,  
12 2024, starting at 2:14 p.m., ending at 11:56 p.m.  
13 Bears the Bates No. NATHAN 2151 through NATHAN 2156.

14 (Exhibit 69 marked for identification.)

15 THE WITNESS: Okay.

16 BY MR. GOTTLIEB:

17 Q So Ms. Abel, this is a text exchange  
18 between you and Ms. Nathan on August 12th, 2024?

19 A Yes.

20 Q And in it, you discuss information that  
21 you received on a call with Mr. Heath; is that  
22 right? A meeting or Zoom or some type of  
23 interaction with Mr. Heath?

24 A I'm on with Jamey. Yes, I must have  
25 been. Yes.

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## 1 REPORTER'S CERTIFICATE

2 I, ASHLEY SOEVYN, a Certified Shorthand  
3 Reporter of the State of California, do hereby  
4 certify:

5 That the foregoing proceedings were taken  
6 before me at the time and place herein set forth;  
7 at which time the witness was put under oath by me;

8 That the testimony of the witness, the  
9 questions propounded, and all objections and  
10 statements made at the time of the examination were  
11 recorded stenographically by me and were thereafter  
12 transcribed;

13 That a review of the transcript by the  
14 deponent was/ was not requested;

15 That the foregoing is a true and correct  
16 transcript of my shorthand notes so taken.

17 I further certify that I am not a relative  
18 or employee of any attorney of the parties, nor  
19 financially interested in the action.

20 I declare under penalty of perjury under  
21 the laws of California that the foregoing is true  
22 and correct. Dated this 27th day of September,  
23 2025.



ASHLEY SOEVYN

CSR No. 12019