

Exhibit 68

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----
4

BLAKE LIVELY,

Plaintiff,

5
6 - v - 24-cv-10049 (lead case);
25-cv-449

7 WAYFARER STUDIOS LLC, JUSTIN BALDONI,
8 JAMEY HEATH, STEVE SAROWITZ, IT ENDS WITH
9 US MOVIE LLC, MELISSA NATHAN, THE AGENCY
GROUP PR LLC, JENNIFER ABEL, JED WALLACE,
STREET RELATIONS INC.,

Defendants.

10 No. 1:24-cv-10049-LJL
11 (Consolidated with 1:25-cv-00449-LJL)
12 -----

13 WAYFARER STUDIOS LLC, JUSTIN BALDONI,
14 JAMEY HEATH, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, and JENNIFER ABEL,

Plaintiffs,

15 - v -
16 BLAKE LIVELY, RYAN REYNOLDS, LESLIE
17 SLOANE, VISION PR, INC., THE NEW YORK
TIMES COMPANY,

Defendants.

18 -----
19
20 HIGHLY CONFIDENTIAL
ATTORNEYS' EYES ONLY

21
22 VIDEOTAPED DEPOSITION OF
LESLIE SLOANE
23 Ft. Lauderdale, Florida
September 26, 2025
24

25 Reported By:
ERIC J. FINZ

1 LESLIE SLOANE - HIGHLY CONFIDENTIAL

2 A. Yup. 03:16:02

3 Q. And did you call her an 03:16:02

4 asshole because according to James from 03:16:04

5 the Daily Mail she was leaking stories to 03:16:06

6 him? 03:16:08

7 MS. ANASTASIO: Objection. 03:16:11

8 MS. MCCAWLEY: Objection. 03:16:15

9 MS. GOVERNSKI: Objection. 03:16:18

10 Q. Or for another reason? 03:16:19

11 A. Because as I was, as I stated 03:16:21

12 earlier, I thought she was leaking the 03:16:23

13 stories. 03:16:23

14 (Reporter clarification.) 03:16:23

15 A. Leaking, or giving, or what 03:16:29

16 they use as their favorite word, seeding 03:16:30

17 or planting. 03:16:32

18 Q. Who is "they"? You said 03:16:38

19 "their favorite word." 03:16:41

20 A. The publicists who were 03:16:43

21 involved in this case. 03:16:45

22 Q. Have you ever seeded a story? 03:16:46

23 A. No. 03:16:48

24 Q. Have you ever planted a story? 03:16:48

25 A. No. 03:16:50

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1 LESLIE SLOANE - HIGHLY CONFIDENTIAL

2 Q. Help him win what? 04:04:49

3 A. The attack, the smear campaign 04:04:53

4 that was starting. 04:04:57

5 Q. How do you know Justin Baldoni 04:04:59

6 had anything to do with any negative 04:05:00

7 press that Ms. Lively was receiving as of 04:05:04

8 August 13th? 04:05:07

9 MS. GOVERNSKI: Objection. 04:05:08

10 A. I base it on him hiring 04:05:09

11 Melissa Nathan. 04:05:12

12 Q. So you assume that because 04:05:13

13 Justin Baldoni hired Melissa Nathan, that 04:05:15

14 they had done something to plant or seed 04:05:17

15 negative stories about Blake Lively. Is 04:05:20

16 that your testimony? 04:05:22

17 MS. MCCAWLEY: Objection. 04:05:24

18 MS. GOVERNSKI: Objection. 04:05:24

19 A. I can add to that by telling 04:05:25

20 that you Melissa Nathan shared with me 04:05:27

21 that he did do some things, that's why 04:05:29

22 she was brought in. When we were on the 04:05:31

23 phone. When I was in Los Angeles. 04:05:33

24 Q. Do you have an answer to my 04:05:35

25 question? 04:05:36

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1 LESLIE SLOANE - HIGHLY CONFIDENTIAL

2 MS. McCAWLEY: Objection; 04:05:37

3 asked and answered. 04:05:38

4 A. So I'm sorry, please repeat 04:05:38

5 that. 04:05:39

6 Q. So you assume that because 04:05:39

7 Justin had hired Melissa Nathan that they 04:05:41

8 had done something to plant or seed 04:05:44

9 negative stories about Blake Lively; that 04:05:45

10 your testimony? 04:05:47

11 MS. GOVERNSKI: Objection. 04:05:48

12 MS. McCAWLEY: Objection. 04:05:48

13 A. My testimony I believe -- I'm 04:05:49

14 sorry, please just repeat that one more 04:06:01

15 time. I'm getting a little tired. So 04:06:02

16 please repeat that. 04:06:04

17 Q. We can take a break in a 04:06:05

18 moment. 04:06:07

19 A. I don't want a break. I just 04:06:08

20 want to repeat that. 04:06:09

21 Q. I asked you, how do you know 04:06:10

22 Justin Baldoni had anything to do with 04:06:12

23 the negative press that Ms. Lively was 04:06:13

24 receiving as of August 13th. Do you 04:06:15

25 recall that question that I asked you? 04:06:17

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2 A. Yes. And I answered because 04:06:18
3 he hired Melissa Nathan, correct. 04:06:20

4 Q. So are you assuming that 04:06:22
5 because Justin Baldoni hired Melissa 04:06:24
6 Nathan that he had done anything to smear 04:06:27
7 Blake Lively's reputation? 04:06:32

8 MS. MCCAWLEY: Objection. 04:06:33

9 A. I'm not assuming. Melissa 04:06:34
10 Nathan did share with me on a phone call 04:06:36
11 that she was hired to come in to clean 04:06:39
12 his messes up. That he was lucky to have 04:06:41
13 her. He did some stupid things. So 04:06:44
14 yeah. 04:06:46

15 Q. Did she tell you that she was 04:06:47
16 going to seed or plant negative press 04:06:49
17 about Blake Lively on Justin's behalf? 04:06:51

18 A. It was the opposite. She told 04:06:54
19 me she wasn't doing it. 04:06:56

20 Q. Okay. So again, what basis 04:06:57
21 did you have to believe that Justin 04:06:59
22 Baldoni or Melissa Nathan had anything to 04:07:03
23 do with the negative press that Blake 04:07:06
24 Lively was receiving as of August 13th? 04:07:08

25 MS. GOVERNSKI: Objection. 04:07:10

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1 LESLIE SLOANE - HIGHLY CONFIDENTIAL

2 MS. McCAWLEY: Objection; 04:07:11

3 asked and answered. 04:07:12

4 A. My knowledge in the industry 04:07:12

5 and the fact that Melissa is a crisis 04:07:13

6 manager. 04:07:16

7 Q. You made an assumption; 04:07:16

8 correct? 04:07:17

9 A. No. 04:07:17

10 MS. McCAWLEY: Objection. 04:07:18

11 Q. Oh. So what facts is it based 04:07:18

12 on? 04:07:21

13 MS. GOVERNSKI: Objection. 04:07:21

14 MS. McCAWLEY: Join. 04:07:22

15 Q. You can answer. 04:07:27

16 A. Oh, thank you. 04:07:28

17 Facts that Melissa shared with 04:07:29

18 me that he did make some mistakes and he 04:07:31

19 did do some things, that that's why they 04:07:33

20 brought her in. 04:07:35

21 Q. Right. 04:07:35

22 You just testified that she 04:07:36

23 didn't tell you that she was going to be 04:07:38

24 doing anything to seed or plant or create 04:07:39

25 negative press about Ms. Lively. 04:07:41

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1 LESLIE SLOANE - HIGHLY CONFIDENTIAL

2 Correct? 04:07:43

3 MS. GOVERNSKI: Objection. 04:07:44

4 MS. McCAWLEY: Objection. 04:07:44

5 A. She didn't say she wasn't. 04:07:45

6 That's referring to my emails that you'll 04:07:47

7 pull at some point with her, texts with 04:07:50

8 her that said that. But no, she shared 04:07:53

9 with me that Justin's -- somewhat of an 04:07:55

10 idiot and did stupid things and that's 04:07:59

11 why she's here to clean them up. So 04:08:01

12 that's what I base this on. 04:08:04

13 Q. So you assume because Melissa 04:08:05

14 Nathan -- 04:08:08

15 A. I don't assume. This is what 04:08:08

16 I'm basing it on. Different word. 04:08:09

17 Q. So because Melissa Nathan 04:08:11

18 didn't tell you that she wouldn't plant 04:08:13

19 negative stories, you're assuming that 04:08:14

20 she did? 04:08:17

21 MS. McCAWLEY: Objection. 04:08:18

22 MS. GOVERNSKI: Objection. 04:08:18

23 A. Didn't say that. I'll say it 04:08:19

24 a third time. Because Melissa Nathan 04:08:21

25 shared with me that he had done some 04:08:23

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2 than one thing from James? I'm 05:57:41

3 sorry, I have to read the email, 05:57:42

4 all the paperwork from James. 05:57:46

5 I feel the fact that you're 05:59:32

6 asking me that question that it's 05:59:33

7 somewhere here. 05:59:35

8 Q. Why do you assume that? 05:59:35

9 A. Because every time you ask me 05:59:36

10 a question you produce a document. I've 05:59:38

11 noticed your pattern. I pick up on 05:59:40

12 things. And I'm not going to get in 05:59:43

13 trouble for this. 05:59:52

14 MR. FRITZ: I'm happy to 05:59:53

15 withdraw the question and move on. 05:59:54

16 It's not in any of the documents 05:59:56

17 I've shown you so far. 05:59:58

18 THE WITNESS: Then thank you, 05:59:59

19 please move on. Because I can't 06:00:01

20 answer that. 06:00:02

21 Q. Did James from the Daily Mail 06:00:06

22 ever tell you that Melissa Nathan had not 06:00:08

23 done anything anti-Blake? 06:00:13

24 Do you recall that? 06:00:16

25 MS. GOVERNSKI: Objection. 06:00:17

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2 MS. McCAWLEY: Join. 06:00:18

3 A. Yes. 06:00:19

4 Q. Did you, at the time, have any 06:00:19

5 reason to disbelieve him? 06:00:22

6 A. In that case, knowing their 06:00:26

7 friendship, I questioned it. 06:00:28

8 Q. Okay. 06:00:32

9 A. And her close relationship 06:00:35

10 with the Daily Mail and the entire L.A. 06:00:37

11 office. And that her sister over the 06:00:39

12 years had told me how close they were to 06:00:41

13 all the women at the Daily Mail. Yes. 06:00:44

14 Q. Have you ever seen any 06:00:46

15 documents, emails, text messages from 06:00:54

16 Melissa Nathan to anyone demonstrating 06:00:58

17 that Melissa Nathan caused anything 06:01:02

18 negative to be written about Blake 06:01:05

19 Lively? 06:01:07

20 MS. GOVERNSKI: Objection. 06:01:07

21 MS. McCAWLEY: Objection. 06:01:08

22 A. I've seen texts in the 06:01:11

23 complaints that we can -- that she made a 06:01:15

24 reference to a reporter that Jen Abel had 06:01:22

25 or Jen Abel did both of them, they had 06:01:25

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1 LESLIE SLOANE - HIGHLY CONFIDENTIAL

2 C E R T I F I C A T E

3 STATE OF NEW YORK)

: ss.

4 COUNTY OF NEW YORK)

5

6 I, ERIC J. FINZ, a Shorthand
7 Reporter and Notary Public within and for
8 the State of New York, do hereby certify:

9 That LESLIE SLOANE, the witness
10 whose deposition is hereinbefore set
11 forth, was duly sworn by me and that such
12 deposition is a true record of the
13 testimony given by the witness.

14 I further certify that I am not
15 related to any of the parties to this
16 action by blood or marriage, and that I
17 am in no way interested in the outcome of
18 this matter.

19 IN WITNESS WHEREOF, I have hereunto
20 set my hand this 29th day of September,
21 2025.

22

23

24

25



ERIC J. FINZ