

# Exhibit 270

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, et al.  
Defendants.

## Defendants.

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VIDEOTAPED DEPOSITION OF:

ARON CULOTTA

Thursday, November 20, 2025

10:01 a.m. (CST)

New Orleans, Louisiana

Reported by: YOLANDA J. PENA, CCR, RPR  
No. 2017002 in and for the  
State of Louisiana

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## 1 REPORTER'S PAGE

2 I, YOLANDA J. PENA, Certified Court Reporter in  
3 and for the State of Louisiana, (CCR #2017002),  
4 Registered Professional Reporter (RPR #970346), the  
5 officer, as defined in Rule 28 of the Federal Rules of  
6 Civil Procedure and/or Article 1434(B) of the  
7 Louisiana Code of Civil Procedure, do hereby state on  
8 the record:

9 That due to the interaction in the spontaneous  
10 discourse of the proceeding, double dashes (--) have  
11 been used to indicate pauses, changes in thought,  
12 and/or talkovers; that same is the proper method for a  
13 transcription of proceedings, and that the double  
14 dashes (--) do not indicate that words or phrases have  
15 been left out of this transcript;

16 That any spelling of words and/or names which  
17 could not be verified through reference material have  
18 been denoted with the parenthetical "(phonetic)";

19 That the parenthetical "(sic)" is used to denote  
20 when a witness stated a word or phrase that appears  
21 odd or erroneous to show that it was quoted exactly as  
22 it stands.

23  
24 YOLANDA PENA, CCR, RPR  
25

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1 Q. Let's say 50 percent.

2 A. 50 percent. Again, it depends, but I would  
3 say in the literature and for -- for annotations of  
4 this type, 50 percent would often be called something  
5 like moderate agreement.

6 Q. Look at paragraph 54 of your report. The  
7 first sentence ends, it says -- well, I'll read the  
8 first sentence. "My analysis indicates that  
9 Top-Comments for videos in August that were aligned  
10 with the 'key messaging points' of the campaign (i.e.,  
11 they elevate negative content about Ms. Lively or  
12 positive content about Mr. Baldoni) consistently  
13 generated a higher Top-Comment Share than expected."

14 Do you see that?

15 A. Yes, sir.

16 Q. Expected by who? What -- what are you  
17 referring to in there?

18 A. So this would be a -- more of a statistical  
19 argument about the average or -- the average type --  
20 excuse me, the average top-comment share that one sees  
21 in this specific dataset.

22 Q. So when you say higher than expected, does  
23 that just mean higher than average?

24 A. Not simply higher than average, but we perform  
25 statistical tests to determine whether that is a

1                   statistically significant deviation.

2                   Q.     Okay.  So when you say higher than expected,  
3                   are you saying significantly -- significant deviation?

4                   A.     Yes.  We are -- we are indicating significant  
5                   deviation from the mean for these.

6                   Q.     Okay.  Significant deviation from the average  
7                   of the top-comment share, correct?

8                   A.     Correct.

9                   Q.     That's what you're referring to?

10                  A.     Yes, sir.

11                  Q.     In your analysis of the comments, did you  
12                  consider that at the time period you're looking at  
13                  Blake Lively was promoting an alcohol brand at the same  
14                  time as the premiere of a movie about domestic  
15                  violence?  Did that play into your analysis at all?

16                  MS. BENDER:  Objection.

17                  A.     I wouldn't say I treated that differently from  
18                  other events in the data.

19                  BY MR. KALTGRAD:

20                  Q.     Did you consider it at all?

21                  MS. BENDER:  Objection.

22                  A.     Only to the extent that it appeared in the  
23                  data I was examining.

24                  BY MR. KALTGRAD:

25                  Q.     And how did you address it?  How did that

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1 MR. KALTGRAD: Dr. Culotta, I'm now  
2 looking at --

3 THE VIDEOGRAPHER: We are going back on  
4 the record.

5 MR. KALTGRAD: Oh, I'm sorry.

6 THE VIDEOGRAPHER: The time is 11:21.

7 You're all good.

8 BY MR. KALTGRAD:

9 Q. Dr. Culotta, I'm now looking at paragraph 54  
10 of your report. If you could, turn there. And towards  
11 the bottom of paragraph 54, it says, "Both the  
12 anti-Lively and pro-Baldoni average comment shares are  
13 a statistically significant deviation from the mean,  
14 suggesting there was a concerted effort to seed and/or  
15 elevate these comments."

16 On what basis do you draw the conclusion that  
17 a deviation from the mean means a concerted effort to  
18 seed and/or elevate the comments?

19 A. So I guess there would be two -- two primary  
20 issues here. One, the -- such a large deviation from  
21 the mean is an indicator of anomalous behavior, right,  
22 something that is not typical of a TikTok user.

23 But the second reason has to do with this top  
24 comment idea in the first place via the interface,  
25 right. So on TikTok, of course, it's very video-based,

1 and typically, one is scrolling through videos. So the  
2 user effort required to first open up the comment  
3 section, scroll to a comment, and upvote it is just,  
4 from a user perspective, a very kind of unusual thing  
5 to do at that level of frequency.

6 So both the anomalous statistics that I talk  
7 about as well as kind of the anomalous engagement with  
8 the platform itself, both serve as indicators that this  
9 was done through a concerted effort.

10 Q. How much of a standard deviation would have to  
11 occur to reach the conclusion that there was concerted  
12 effort?

13 A. Again, there's no strict threshold here. I  
14 did a statistical test to determine the significance  
15 level of that deviation, and that's in footnote 145.  
16 And all of those are your confident very small p  
17 values, which serves to indicate that they were extreme  
18 outliers.

19 Q. And when you say "deviation from the mean,"  
20 you're referring to the mean top comment share for  
21 August for the four different categories that you've  
22 listed there, right?

23 A. It's the mean over all -- over all top  
24 comments in August.

25 Q. And that's reflected in Figure 1?

1 A. Yes, sir. That's the 9.2 percent in Figure 1.

2 Q. How did you calculate the top comment share  
3 mean?

4 A. So for every top comment in August, each one  
5 has a top-comment share value, and I simply averaged  
6 those over all of the top comments collected for  
7 August.

8 Q. Is it your opinion that unless there is a --  
9 strike that.

10 Are you offering the opinion that if there is  
11 a standard deviation from the mean for either  
12 anti-Lively, pro-Baldoni, pro-Lively, or  
13 unsure/unrelated categories, that would equate to a  
14 concerted effort to seed or elevate the comments?

15 MS. BENDER: Objection.

16 A. I'm not offering that one standard deviation  
17 is -- is a threshold, necessarily.

18 THE REPORTER: I'm sorry. Can you  
19 repeat that?

20 A. I'm not offering that one standard deviation  
21 is a threshold. What I am saying is that this  
22 significant deviation from the mean combined with the  
23 modality of the app itself contextually serve as -- as  
24 strong evidence of a concerted effort here.

25 BY MR. KALTGRAD:

1 upvotes that comments received minus the number of  
2 downvotes that comments received.

3 Q. And how is it calculated exactly? Do you  
4 know?

5 A. So the exact algorithm is not publicly  
6 published by Reddit. Part of the reason is they're  
7 trying to prevent manipulation of that metric. But  
8 what we do know is -- is, as I said, it's roughly that  
9 difference between upvotes and downvotes.

10 Q. And you were offering the opinion that because  
11 there was a high comment score on a specific Reddit  
12 thread in August 14th, 2024, that's evidence of some  
13 kind of manipulation; is that right?

14 MS. BENDER: Objection.

15 A. I would say the Reddit analysis is broader  
16 than that specific thing, but yes, I would say the  
17 extreme outlier activity we see on August 14th is a  
18 strong indicator of potential inauthentic activity.

19 BY MR. KALTGRAD:

20 Q. Are you aware of any peer-reviewed study  
21 showing that a comment score on Reddit is indicative of  
22 social media manipulation?

23 A. Again, I think some of the literature we  
24 discussed earlier that focuses on anomalous engagement  
25 metrics would -- would support this type of analysis.

1 BY MR. KALTGRAD:

2 Q. Okay. The third one isn't even close, right?

3 A. I guess I would say that 6500 is slightly more  
4 than half of 12,000 and that 12,000 is less than half  
5 of 27,000.

6 Q. I'm going to your report now. Paragraph 81,  
7 you say, "The activity that I analyzed and observed  
8 collectively demonstrates evidence of artificial or  
9 manipulating activity."

10 And from what I can tell, the next several  
11 pages describes comments that you coded as anti-Lively  
12 or pro-Bal- -- pro-Baldoni that got lots of upvotes and  
13 comments that you coded as pro-Lively that got lots of  
14 downvotes.

15 Is that a fair summary?

16 MS. BENDER: Objection.

17 A. That's certainly part of -- of what I did  
18 there, yeah.

19 BY MR. KALTGRAD:

20 Q. Okay. So these upvotes and downvotes, how  
21 does that lead to evidence of artificial or  
22 manipulating activity?

23 A. Sure. So I think particularly, if I look at,  
24 for example, Figure 12, which is looking at every  
25 comment in this four-month period -- and as a reminder,

1 this is over 450,000 comments from all of Fauxmoi, not  
2 just those related to Ms. Lively or related folks.

3 So what I'm showing here is the distribution  
4 of comment scores for all comments in this four-month  
5 period, so it's a very large dataset. And these red  
6 triangles are indicating comments that are related to  
7 either Ms. Lively or Mr. Baldoni.

8 And what this graph is showing is that if you  
9 look at these extreme -- these very extreme comments,  
10 including the highest-scoring one, which is that red  
11 triangle at the very top left, as well as the red  
12 triangles all the way at the other side of the graph,  
13 what this is showing is that not only are these  
14 comments extreme outliers in terms of this Reddit  
15 score, but also that the sentiment attached to these  
16 are also aligned with the goals of the alleged  
17 campaign.

18 In other words, everything -- I'm sorry.  
19 Everything with the high positive score, the vast  
20 majority of those are either anti-Lively or  
21 pro-Baldoni, whereas on the other side of the graph,  
22 the vast majority are either pro-Lively or  
23 anti-Baldoni.

24 Q. So you've got scores that are high that you've  
25 coded as anti-Lively. How do you make the leap to

1 coordinated activity from that?

2 A. So it's a little bit like these -- the same  
3 rationale in the TikTok analysis, right. So I have --  
4 again, I want to emphasize -- extreme outliers here in  
5 these red scores that would be very difficult to obtain  
6 without any coordination combined with the sentiment  
7 consistency around what is -- has a high versus low  
8 score.

9 Q. Why do you say it would be very difficult to  
10 obtain without coordination? What's that based on?

11 A. Several things. I mean, in part having worked  
12 for a long time with this type of data, but also, the  
13 fact that when we look at the actual comments and posts  
14 themselves, I do see, of course, a distribution of  
15 sentiment, pro-/anti-Lively, that one would expect.

16 So the fact that -- the comments themselves  
17 seem to have that heterogeneity, yet the concentration  
18 on the extreme tails of this graph are instead very  
19 homogenous in their sentiment direction.

20 Q. Did you analyze the timing of upvotes or  
21 downvotes in any way?

22 A. I didn't look at the time of specific upvotes,  
23 but I do have the time stamp of when that  
24 upvote/downvote or Reddit score was captured.

25 Q. You next look at the "little bump" YouTube

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1           secondly, to look at the presence of particular terms,  
2           such as the term "bully," that appeared in those  
3           comments.

4           Q.     What expertise do you have that a layperson  
5           would not have to look at comments and the timing?

6           A.     Well, for sure, there's a lot that goes into  
7           collecting, cleaning, and analyzing the data in order  
8           to answer those types of questions, as well as the text  
9           analysis to pull out particular words of interest in  
10           the -- in the data.

11           Q.     And what particular words did you pull out?

12           A.     So in this case, we were looking at the word  
13           "bully" and a couple variants of it.

14           Q.     Are you aware of any peer-reviewed study that  
15           says that pulling out terms and comments, looking at  
16           the timing is indicative of online manipulation?

17           MS. BENDER: Objection.

18           A.     So yes, I would say -- I would say that the  
19           literature we cite in this report, some of which we've  
20           discussed, looks at anomalous engagement and language  
21           behaviors as signals of inauthenticity. I would say  
22           that this analysis falls into that camp.

23           BY MR. KALTGRAD:

24           Q.     Okay. So you've seen -- what did your  
25           analysis -- you know, what did your analysis reveal

1 about the term "bully"?

2 A. My analysis shows -- and this would be on --  
3 let me get the figure here. This will be Figure 17,  
4 which is looking at the -- the fraction of comments on  
5 this video on YouTube that contain the word "bully" for  
6 each hour of this time range of interest, and what it's  
7 showing is that -- several things.

8 First of all, prior to this video being linked  
9 on Reddit and prior to it -- prior to the timing of  
10 the -- the TAG suggestion that we just discussed,  
11 number one, there was almost no engagement on this  
12 video in terms of the number of comments for over four  
13 days. And number two, the volume of comments using the  
14 word "bully" increased sharply after that suggestion to  
15 send the -- the video to Mr. Wallace.

16 Q. Are you offering the opinion that any  
17 defendant added content -- added a comment with the  
18 word "bully"?

19 A. Again, I'm not analyzing any one specific  
20 comment. I'm saying this pattern that I'm observing in  
21 this figure is consistent with a connection between the  
22 work of -- of the defendants and the observed language  
23 I see here.

24 Q. Well, you say -- you pulled out a lot of  
25 comments with the word "bully." My question is, are