

Exhibit 281

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 - - - - - - - - - - - - - - x

4 BLAKE LIVELY,

5 Plaintiff,

6 v.

7 WAYFARER STUDIOS LLC, a Civ. Action No.

Delaware Limited

8 Liability Company, 1:24-cv-10049-LJL

JUSTIN BALDONI, an

9 individual, JAMEY HEATH, (Consolidated for

an individual, STEVE

10 SAROWITZ, an individual, pretrial purposes with

IT ENDS WITH US MOVIE

11 LLC, a California 1:25-cv-00449-LJL)

Limited Liability

12 Company, MELISSA NATHAN, Rel. 1:25-cv-00779-LJL

an individual, THE

13 AGENCY GROUP PR LLC, a

Delaware Limited

14 Liability Company,

JENNIFER ABEL, an

15 individual, JED WALLACE,

an individual, and

16 STREET RELATIONS INC., a

California Corporation

17 Defendants.

18 - - - - - - - - - - - - - - x

19 Videotaped Deposition of BLAKE LIVELY

20 New York, New York

21 Wednesday, July 30, 2025

22 10:15 A.M.

23 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

24 Pages: 1 - 294

25 Reported By: Anita M. Trombetta, RMR, CRR,
California CSR No. 14647

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

12

1 ATTORNEY SCHUSTER: That's correct. 10:18:18

2 ATTORNEY HUDSON: Okay. Thank you. 10:18:20

3 B L A K E L I V E L Y, called as a witness,
4 having been first duly sworn by a Notary Public,
5 was examined and testified as follows:

6 EXAMINATION BY

7 ATTORNEY FREEDMAN:

8 Q Good morning. What's your full legal 10:18:25

9 name? 10:18:27

10 A Blake Ellender Reynolds. 10:18:27

11 Q And what is your date of birth? 10:18:33

12 A 8/25/1987. 10:18:35

13 Q How long have you been an actress? 10:18:39

14 A 21 years. 10:18:42

15 Q Do you recall the year you started? 10:18:48

16 A Professionally, 2004. 10:18:51

17 Q You agreed to play the role of Lily Bloom 10:18:54

18 in It Ends With Us at the end of 2022; is that 10:19:03

19 correct? 10:19:09

20 A Yes. 10:19:09

21 Q Prior to that time, had you heard about 10:19:10

22 the book with the same title? 10:19:13

23 A Prior to agreeing? 10:19:16

24 Q Yes. 10:19:20

25 A Yes. 10:19:21

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

15

1 Q And what did you learn about how large the 10:22:14
2 fan base was? 10:22:17

3 ATTORNEY HUDSON: Objection. 10:22:19

4 A Can you be more specific? 10:22:22

5 Q Sure. 10:22:23

6 When you first had learned about it having 10:22:24
7 a large fan base, what did you specifically learn 10:22:26
8 about the fan base? 10:22:29

9 A I -- I don't understand the difference in 10:22:31
10 the question, that it was a large fan base? 10:22:35

11 Q All right. Did you know how many people 10:22:38
12 that large fan base consisted of? 10:22:40

13 A No. 10:22:42

14 Q Did you know how many people had -- you 10:22:43
15 know, was there a following where a number of 10:22:53
16 people loved the book? 10:22:56

17 ATTORNEY HUDSON: Objection. 10:22:57

18 A I don't understand the question. I'm 10:22:59
19 sorry. 10:23:01

20 Q That's okay. I'll ask many questions that 10:23:01
21 will be unintelligible. I apologize in advance 10:23:05
22 for that. Let me -- let me try it a different 10:23:07
23 way. 10:23:09

24 Prior to accepting the role, did you know 10:23:15
25 what genre the book was? 10:23:17

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 A I don't -- I don't know. 10:23:20

2 Q Do you recall whether it was a comedy or a 10:23:36

3 love story, and did you know anything like that 10:23:40

4 prior to accepting the role? 10:23:43

5 A Yes. 10:23:44

6 Q What did you know about the genre? 10:23:45

7 A I knew that there was -- well, prior to 10:23:47

8 accepting the role, I read the script. So it's a 10:23:51

9 little hard to differentiate the two. But, yeah, 10:23:55

10 I knew that there was romance. I knew that there 10:24:04

11 was drama. I knew that there was trauma. I knew 10:24:08

12 that there was levity. I knew that there were 10:24:12

13 many facets in this story. 10:24:14

14 Q And you knew that as a result of reading 10:24:16

15 the script or as a result of talking to someone 10:24:20

16 else prior to the time that you accepted the role? 10:24:22

17 A Reading the script. 10:24:24

18 Q Prior to accepting the role, were you 10:24:26

19 aware of what age demographic liked the book? 10:24:32

20 A I don't remember. 10:24:40

21 Q Prior to accepting the role, had you heard 10:24:40

22 of Colleen Hoover? 10:24:49

23 A No. 10:24:51

24 Q When did you first hear of Colleen Hoover? 10:24:51

25 A In that same phone call that I mentioned 10:25:01

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q And did you have any concern prior to 10:42:58
2 accepting the role that that would be some sort of 10:43:02
3 an issue, that he would be both the lead actor and 10:43:06
4 also, you know, be the director? 10:43:13

5 A I have worked with actors before who have 10:43:19
6 been both the actor and director. So it's not 10:43:24
7 necessarily an immediate concern, but there are 10:43:34
8 many factors at play with each person. 10:43:39

9 Q And were there factors at play 10:43:44
10 specifically with Mr. Baldoni as the male lead and 10:43:47
11 the director during that time? 10:43:51

12 A Specific to him, not necessarily. Every 10:43:55
13 job, you have to consider all elements and all 10:44:04
14 factors. 10:44:06

15 Q Okay. Prior to accepting the role to play 10:44:07
16 Lily Bloom, had you met Justin Baldoni? 10:44:09

17 A Yes. 10:44:12

18 Q On how many occasions? 10:44:13

19 A One. 10:44:15

20 Q Where was that meeting? 10:44:17

21 A In New York City, in my apartment. 10:44:18

22 Q How long did that meeting last? 10:44:22

23 A I don't recall. It was a couple hours. 10:44:32

24 Q And do you recall when that meeting was? 10:44:38

25 A December of 2022. 10:44:44

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 A To me? No. 11:36:35

2 Q Did Steve Sarowitz affirmatively do 11:36:42

3 anything himself that made you feel uncomfortable 11:36:50

4 or you felt was inappropriate? 11:36:57

5 A I felt him attending the birthing scene 11:37:01

6 was inappropriate. 11:37:05

7 Q When was the birthing scene? 11:37:07

8 A May of 2023. 11:37:19

9 Q What did Justin Baldoni do to sexually 11:37:20

10 harass you? 11:37:49

11 ATTORNEY HUDSON: Objection. 11:37:50

12 A Can you be more specific? 11:37:51

13 Q Sure. 11:37:58

14 You're claiming that Justin Baldoni 11:37:59

15 sexually harassed you, correct? 11:38:01

16 A Yes. It's a long complaint. 11:38:03

17 Q Is that "yes"? 11:38:05

18 A Yes. 11:38:09

19 Q What did he do to sexually harass you? 11:38:10

20 ATTORNEY HUDSON: Objection. 11:38:16

21 A There were a series of things. 11:38:18

22 Q Do you recall the first thing that he did 11:38:29

23 where you felt you were sexually harassed? 11:38:31

24 ATTORNEY HUDSON: Objection. 11:38:42

25 A There were things that he said and did 11:38:43

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 where at the time, you don't totally -- you feel 11:38:51
2 confused by someone's behavior or words being at 11:39:11
3 odds with who they say they are. And you start to 11:39:22
4 see different pieces come together, and it 11:39:35
5 feels -- the workplace feels overwhelming. So 11:39:48
6 there were different moments. 11:39:52

7 Q What is the first thing that you recall? 11:39:54

8 A I recall him telling me that he's 11:40:00
9 circumcised. 11:40:07

10 Q When did he tell you that? 11:40:09

11 A In December of 2022. 11:40:15

12 Q And where were you physically when he told 11:40:20
13 you that? 11:40:25

14 A At my apartment. 11:40:27

15 Q Was that the same meeting that we were 11:40:29
16 previously discussing or a different meeting? 11:40:40

17 A It was the same meeting. 11:40:42

18 Q And how did that come up? Were you 11:40:43
19 discussing something or it just came up out of the 11:40:50
20 blue? 11:40:53

21 A I was pregnant and I didn't know the 11:40:53
22 gender of my child. And we were discussing 11:40:59
23 different decisions that parents make and 11:41:06
24 different factors, having boys versus girls. I 11:41:12
25 only had girls. And we were discussing the 11:41:19

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 different medical decisions people make these 11:41:29
2 days, including circumcision for male babies. 11:41:32
3 Q And did he bring that up or did you bring 11:41:37
4 that up? 11:41:41
5 A I don't remember. 11:41:41
6 Q What did he say about circumcision? 11:41:42
7 A He told me the decision that they made for 11:41:50
8 their child. They, being him and his wife Emily. 11:42:00
9 And then he offered that he was circumcised. 11:42:05
10 Q And did you say anything in response to 11:42:10
11 that? 11:42:12
12 A I was in shock. 11:42:12
13 Q You say you were in shock. You couldn't 11:42:14
14 speak or? 11:42:19
15 A I don't know. I don't know what I -- I 11:42:21
16 don't know what I said or did. 11:42:26
17 Q Did you tell him that you were offended by 11:42:28
18 it? 11:42:33
19 A No. 11:42:34
20 Q Did you discuss with anyone the fact that 11:42:36
21 you were offended by him saying that? 11:42:40
22 A Yes. 11:42:42
23 Q Who did you -- who did you discuss that 11:42:46
24 with? 11:42:49
25 A My husband. 11:42:49

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q When did you discuss it with your husband? 11:42:52
2 A I don't recall. 11:42:58
3 Q Was your husband in the apartment during 11:42:59
4 that meeting? 11:43:03
5 A I don't remember. 11:43:04
6 Q And were you offended by him talking about 11:43:06
7 the choices, the different choices that were made 11:43:16
8 and that him and Emily made the choice to have 11:43:22
9 their child circumcised, or were you just offended 11:43:25
10 by him saying that he was circumcised, or both? 11:43:32
11 ATTORNEY HUDSON: Objection. 11:43:36
12 A I was not offended by them sharing the 11:43:37
13 medical decisions they made for their child, no. 11:43:43
14 Q But you were offended by him sharing that 11:43:46
15 he was circumcised? 11:43:57
16 A The feeling was much more complex than 11:43:59
17 "offended," but I found it disturbing, yes. 11:44:04
18 Q I'm -- did he just bring it up out of the 11:44:09
19 blue or was he talking about it in context of his 11:44:13
20 parents making the decision? 11:44:17
21 ATTORNEY HUDSON: Objection. 11:44:18
22 A He told me the decision they made for 11:44:19
23 their child, and then he offered that he was 11:44:22
24 circumcised. 11:44:26
25 Q Did he say anything else about that? 11:44:27

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 ATTORNEY HUDSON: Objection. 11:44:35

2 A About what? Can you be more specific? 11:44:35

3 Q About him being circumcised. 11:44:38

4 A About him being circumcised, that's all I 11:44:40

5 remember. 11:44:44

6 Q Did his comment in any way cause you to 11:44:45

7 reconsider whether you wanted to do the film or 11:44:58

8 not? 11:45:01

9 A I found it disturbing, but given that it 11:45:02

10 was one comment and he seemed nice, I wrote it off 11:45:12

11 as him taking a benign conversation too far and 11:45:22

12 hoped and assumed it would be an isolated 11:45:38

13 incident. 11:45:42

14 Q Did you ever tell him that he had taken 11:45:42

15 that comment -- and by making that comment, he had 11:45:48

16 taken that too far? 11:45:52

17 A Yes. 11:45:53

18 Q Okay. When did you tell him that? 11:45:54

19 A Me personally? 11:45:56

20 Q Yes. 11:46:01

21 A I believe the date was January 4th, 2023. 11:46:03

22 Q Prior to January 4th, 2023, had you told 11:46:10

23 him that he had taken that too far and that was an 11:46:20

24 inappropriate comment? 11:46:24

25 A That specific comment? 11:46:25

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Transcript of Blake Lively

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1 revealing attorney -- communications with your 11:47:45
2 attorney, you can answer. But otherwise, I 11:47:49
3 instruct you not to answer. 11:47:51

4 A Can you be more specific with your timing? 11:47:52

5 Q Sure. 11:47:54

6 Did you -- after he had made that comment, 11:47:56
7 did -- after that meeting, did you tell your -- 11:48:00

8 A Immediately after, is that what -- I just 11:48:02
9 want to understand. 11:48:04

10 Q At any time. I want to find out if there 11:48:05
11 is some point in time where you told your manager 11:48:07
12 or you told your agent, I'm just trying to find 11:48:09
13 out when that was, if there was a time that you 11:48:12
14 told them? 11:48:14

15 ATTORNEY HUDSON: Is your question limited 11:48:15
16 to manager or agent? 11:48:16

17 ATTORNEY FREEDMAN: Yes. 11:48:17

18 A I don't recall when or if I told them 11:48:18
19 that -- my manager or agent that specific comment. 11:48:35
20 I believe I did. 11:48:43

21 Q You believe you did. 11:48:44

22 You just don't recall whether you did or 11:48:46
23 not? 11:48:47

24 ATTORNEY HUDSON: Objection. 11:48:48

25 A I believe at some point before -- from the 11:48:49

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1 time that that comment was made until now, yes, I 11:48:59
2 do believe that I've discussed that with them. 11:49:02
3 Q Do you recall when you discussed it with 11:49:04
4 them? 11:49:08
5 I mean, was it closer to now or closer to 11:49:09
6 when the comment was made? 11:49:11
7 A I don't know. 11:49:13
8 Q And you said that you've discussed it with 11:49:14
9 your husband; is that correct? 11:49:22
10 A Yes. 11:49:24
11 Q When did you discuss it with your husband? 11:49:25
12 ATTORNEY HUDSON: Objection. 11:49:28
13 A Not immediately after. 11:49:29
14 Q When you say "not immediately after," was 11:49:43
15 there some point in the future when you did 11:49:45
16 discuss it with your husband? 11:49:47
17 A Yes. 11:49:49
18 Q And when was that? 11:49:49
19 A When more incidents occurred that made me 11:49:51
20 feel disturbed. 11:49:59
21 Q Did Justin say anything else during that 11:50:07
22 meeting in December to you that made you feel 11:50:18
23 uncomfortable? 11:50:24
24 A Not that I recall. 11:50:28
25 Q Did Justin in that meeting in December say 11:50:29

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1 A Because he told me that he was rewriting 11:52:57
2 the script -- 11:53:03
3 Q Were you also -- 11:53:08
4 A -- and had almost entirely rewritten it. 11:53:09
5 Q I'm sorry. 11:53:11
6 A And had almost entirely rewritten it. 11:53:12
7 Q In April of 2023, were you also rewriting 11:53:18
8 the script? 11:53:21
9 ATTORNEY HUDSON: Objection. 11:53:24
10 A Can you be more specific with the timing? 11:53:24
11 Q Sure. 11:53:26
12 At any time in April of 2023, did you work 11:53:27
13 on a rewrite of the script? 11:53:31
14 A Yes. After the events that I just 11:53:33
15 described to you, yes. 11:53:39
16 Q In April of 2023, had you read the novel, 11:53:40
17 It Ends With Us? 11:53:51
18 A No, I told Justin about my process very 11:53:52
19 early on. 11:53:57
20 Q What do you mean by that? 11:53:57
21 A I mean that I have adapted -- I've been a 11:54:00
22 part of book-to-film adaptations in many 11:54:07
23 circumstances, and sometimes -- there are times 11:54:14
24 where I've read the book in advance, and there are 11:54:17
25 times where I haven't because -- and I found that 11:54:19

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Transcript of Blake Lively

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1 what works better for me is to not read the book 11:54:23
2 in advance because it is hard for me to see the 11:54:28
3 blind spots in the film because you can't unlearn 11:54:37
4 what you know from a book. You can't fill in 11:54:41
5 story or character holes from what you know from a 11:54:44
6 book. So I like to look at the film as its own 11:54:47
7 piece to make sure that it works on its own. 11:54:50

8 Q In April of 2023, did you know that there 11:54:58
9 were sex scenes in the novel, It Ends With Us? 11:55:01

10 A Yes. 11:55:06

11 Q And did you know what sex scenes there 11:55:06
12 were? 11:55:09

13 A I don't understand your question. 11:55:09

14 Q Sure. 11:55:14

15 The book It Ends With Us has sex scenes 11:55:17
16 within the book, correct? 11:55:23

17 ATTORNEY HUDSON: Objection. 11:55:25

18 A I believe so, yes. 11:55:27

19 Q You're not sure, though, right? 11:55:28

20 A I know there are sex scenes in the book, 11:55:31
21 yes. 11:55:36

22 Q Did you read the book? 11:55:36

23 A No. 11:55:38

24 Q How do you know that there are sex scenes 11:55:39
25 in the book? 11:55:45

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Transcript of Blake Lively

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1 A Because I was told. 11:55:45

2 Q Who told you that? 11:55:53

3 A I have since read -- I just want to be 11:55:57

4 more specific with the timing because you said, 11:55:59

5 "Did you read the book?" 11:56:01

6 Are we talking about April of 2023 what 11:56:03

7 time period are we talking about? 11:56:05

8 Q We're talking about any time. 11:56:08

9 A I have since read many chunks of the book. 11:56:10

10 Q When you say "chunks," what parts of the 11:56:18

11 book did you read? 11:56:22

12 A I -- the rooftops section. And I don't 11:56:23

13 remember specifically which other sections. It 11:56:30

14 was usually descriptive. 11:56:32

15 Q When did you read the part of the book 11:56:34

16 that had the rooftop scene? 11:56:38

17 A Spring of '24. 11:56:42

18 Q Had you already rewritten the rooftop 11:56:52

19 scene by the spring of '24? 11:56:59

20 A Yes. 11:57:04

21 Q Did you read the sex scenes in the book It 11:57:08

22 Ends With Us? 11:57:17

23 ATTORNEY HUDSON: Objection. 11:57:17

24 A I don't recall. 11:57:18

25 Q Do you know how many sex scenes there were 11:57:21

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Transcript of Blake Lively

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1 A Yes. 11:59:12

2 Q And in terms of the additional sex scenes, 11:59:14

3 which ones were those? 11:59:32

4 A We're narrowing it just to sex scenes, I 11:59:36

5 just want to be clear about the way I described 11:59:40

6 it, which was sex scenes and gratuitous elements 11:59:42

7 within those scenes and others. 11:59:47

8 So do you mind asking the question again? 11:59:50

9 Q Sure. 11:59:52

10 What do you mean by "gratuitous elements"? 11:59:53

11 A The adding of explicit descriptives or 11:59:55

12 scenes that weren't initially intended to be 12:00:10

13 scenes that contained any aspect of intimacy now 12:00:16

14 containing that. 12:00:28

15 Q As you sit here today, can you recall 12:00:29

16 which ones those were? 12:00:32

17 A I remember a few, yeah. 12:00:33

18 Q Okay. Which ones do you remember? 12:00:42

19 A I remember a scene that was supposed to be 12:00:44

20 the character of Lily visiting Ryle in a hospital 12:00:51

21 as he tended to a child with, I believe, brain 12:01:01

22 cancer, and her observing him kindly and then 12:01:04

23 inviting him to dinner with her mom, becoming a 12:01:09

24 scene in which Lily pulls him into a medical 12:01:13

25 closet and starts role-playing naughty doctor with 12:01:17

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1 him as she invites him to dinner, asking him to -- 12:01:24
2 I don't remember the literal words, but examine 12:01:35
3 her. 12:01:40
4 I remember the description of cunnilingus, 12:01:41
5 the inference being an important element and see 12:01:52
6 Lily's face as she experienced the pleasure. And 12:02:00
7 I remember Lily and Ryle climaxing at the same 12:02:07
8 time together on their wedding night. 12:02:18
9 Q And those were all added in there after 12:02:20
10 the script that you had reviewed when you agreed 12:02:35
11 to do the film; is that correct? 12:02:41
12 A Yes. 12:02:43
13 Q And at some point, did an intimacy 12:02:44
14 coordinator go over some of these scenes with you 12:02:49
15 and ask whether you were comfortable with them or 12:02:54
16 not? 12:02:56
17 A That would not be standard at that point 12:02:57
18 in production in my experience, in over 20 years. 12:03:00
19 Q At some point, did you express that -- 12:03:05
20 express or cross out the cunnilingus scenes? 12:03:09
21 ATTORNEY HUDSON: Objection. 12:03:17
22 A I expressed discomfort with the sexual 12:03:18
23 additions. 12:03:24
24 Q Did you have reason to believe that those 12:03:35
25 were added to the scene not for a creative reason 12:03:37

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1 these additional gratuitous scenes; is that 12:05:02
2 correct? 12:05:06
3 A Yes. 12:05:06
4 Q Did you know whether or not those were 12:05:07
5 creative decisions that were made to add those 12:05:13
6 into the script? 12:05:17
7 ATTORNEY HUDSON: Objection. 12:05:20
8 A If you're asking if upon reading -- is 12:05:21
9 that the timing? 12:05:28
10 Q Yes. 12:05:29
11 A And then what's the question? 12:05:30
12 Q The question is, did you know whether they 12:05:31
13 were added because it was a creative decision that 12:05:34
14 was added that would make, in Justin's opinion, 12:05:36
15 the film better, or did you believe that they were 12:05:42
16 just added because he wanted to just add a bunch 12:05:43
17 of sex scenes in there? 12:05:47
18 ATTORNEY HUDSON: Objection. 12:05:48
19 A I wasn't sure. 12:05:49
20 Q Did you ask him? 12:05:50
21 A Did I ask him what? 12:05:51
22 Q Did you ask him whether he added those 12:05:53
23 gratuitously so that he could have more sex in 12:05:57
24 this scene and to -- to make it offensive towards 12:06:07
25 you, or was this a creative decision that he made? 12:06:11

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Transcript of Blake Lively

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1 ATTORNEY HUDSON: Objection. 12:06:14

2 A I don't remember what -- I remember -- I 12:06:15

3 don't remember what was asked specifically. I do 12:06:29

4 remember expressing concerns with the additions. 12:06:32

5 And I also remember expressing understanding if 12:06:36

6 that was the film he needed to make creatively and 12:06:43

7 if our -- and if what he wanted to make now was 12:06:50

8 different than what I thought we were making, I 12:06:56

9 understood if he needed to work with someone else, 12:07:03

10 and I offered that. 12:07:06

11 Q When you said you expressed concerns, who 12:07:07

12 did you express those to? 12:07:12

13 A Justin Baldoni. 12:07:13

14 Q And when did you express that to him? 12:07:14

15 A After reading those pages, we had a 12:07:17

16 meeting. 12:07:25

17 Q Where did the meeting take place? 12:07:25

18 A At my office. 12:07:27

19 Q The office in the apartment? 12:07:28

20 A Yeah. This is a different one, but yes. 12:07:32

21 Q Do you recall the date of that meeting? 12:07:35

22 A I don't. 12:07:36

23 Q How long did that meeting last? 12:07:37

24 A I don't remember. 12:07:43

25 Q Do you remember specifically what you 12:07:44

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1	ATTORNEY HUDSON: Objection.	12:21:16
2	A I don't know.	12:21:16
3	Q Prior to January 2024, did you ask anyone	12:21:22
4	on your behalf to send a written complaint to	12:21:33
5	Sony?	12:21:38
6	ATTORNEY HUDSON: Well --	12:21:39
7	ATTORNEY FREEDMAN: She can answer "yes"	12:21:41
8	or "no."	12:21:43
9	ATTORNEY HUDSON: Well, objection to the	12:21:47
10	extent it calls for attorney-client privileged	12:21:48
11	communications.	12:21:51
12	In which case, I instruct you not to	12:21:53
13	answer, unless you can answer that question	12:21:54
14	without revealing privileged communications.	12:21:57
15	ATTORNEY FREEDMAN:	12:21:57
16	Q Yes-or-no answer.	12:22:00
17	A I was told by an executive at Sony that I	12:22:02
18	could not complain -- I could not file an HR	12:22:06
19	complaint through Sony.	12:22:09
20	Q Who told you that?	12:22:11
21	A Ange Giannetti.	12:22:12
22	Q And when did she tell you that?	12:22:18
23	A May of 2023.	12:22:19
24	Q Did she tell you that on the telephone or	12:22:21
25	in person?	12:22:23

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

77

1 A Telephone. 12:22:26

2 Q Did you call her or did she call you? 12:22:27

3 A I believe I called her. 12:22:29

4 Q Do you know, was it in the evening or 12:22:36

5 during the day? 12:22:41

6 A I don't remember the exact time. 12:22:42

7 Q Do you recall when in May of 2023 that you 12:22:45

8 called her? 12:22:54

9 A Late May. 12:22:55

10 Q And what did you say to her? 12:22:56

11 A We spoke about a few things. 12:23:00

12 Q Do you recall what you said to her? 12:23:14

13 A Yes. 12:23:16

14 Q What do you recall? 12:23:20

15 A What I said to her in general or are you 12:23:22

16 asking -- 12:23:27

17 Q As much as you can recall. 12:23:30

18 A I and my baby had contracted COVID from 12:23:34

19 the set, and we discussed that. 12:23:37

20 We discussed issues with scheduling and 12:23:48

21 that we weren't making our days. I asked her if 12:23:59

22 she was told that the crew was asked to come in 12:24:12

23 early so that I could attend a concert, because I 12:24:21

24 was -- I had a feeling that while I didn't solicit 12:24:32

25 that, it was offered to me as a way to make the 12:24:38

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 day because we had a strict cutoff in Hoboken. 12:24:43
2 And we were falling behind and they wanted me to 12:24:51
3 come in early. And I was often coming in early 12:24:55
4 because we weren't making our days. 12:24:59
5 They said: Do you want to come in early 12:25:01
6 and we'll get you out for this concert? 12:25:06
7 And I said I -- I'm happy to come in 12:25:10
8 early. I don't -- I'm here to work. I don't need 12:25:14
9 to go to a concert. I'd love to go to a concert, 12:25:17
10 but that's -- I would not ask work to accommodate 12:25:20
11 that. 12:25:22
12 And they said: No, no, it's better for 12:25:23
13 us. 12:25:25
14 And I said: Okay. 12:25:25
15 And I had a feeling that it was being 12:25:26
16 presented as if I was the one that requested that. 12:25:29
17 So I asked her if that's how it was presented to 12:25:32
18 her; and she confirmed that, yes, it was presented 12:25:35
19 that I asked for everyone to come in early so that 12:25:36
20 I could get out for a concert. 12:25:39
21 And I expressed concerns with our first 12:25:42
22 AD, that I understood our other producer Alex Saks 12:25:48
23 to share. And I discussed wanting to file an HR 12:25:53
24 claim with Sony given experiences I had had with 12:26:00
25 Justin Baldoni and Jamey Heath. 12:26:11

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q Did you tell her -- did you tell Ange 12:26:13
2 during that call what experiences you had with 12:26:21
3 Justin Baldoni and Jamey Heath? 12:26:23
4 A I started to. I started to, yes. 12:26:25
5 Q When you say you started to, can you tell 12:26:33
6 me what you recall saying to her? 12:26:39
7 A I recall telling her that while on set, 12:26:40
8 Jamey had approached me, asking if I had a minute 12:26:48
9 without telling me what he wanted to show me, and 12:26:56
10 that it was a video of a naked woman. And that I 12:27:00
11 was very concerned and disturbed and I asked him 12:27:09
12 to stop. 12:27:13
13 And I told her that I felt like the set 12:27:16
14 was untenable and unruly and that there was no 12:27:27
15 structure, and that there was no one in charge, 12:27:36
16 and that the people who were in charge were 12:27:45
17 misbehaving, and that I felt like I had nowhere to 12:27:48
18 go. 12:27:55
19 And she said, "Well, you can't file it 12:27:56
20 through Sony because we don't run physical 12:27:59
21 production. We're just the distributor. You have 12:28:01
22 to file it with Wayfarer." 12:28:04
23 And I said, "Well, so I file it with them 12:28:10
24 about them and they're meant to investigate 12:28:16
25 themselves and share the results and make it 12:28:20

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 better and safer? Does any -- do you guys have 12:28:24
2 visibility into this?" 12:28:26

3 And she said this is -- "We don't oversee 12:28:28
4 physical production." 12:28:32

5 And I said, "Okay, then just please don't 12:28:34
6 say anything while -- I want to talk to my team 12:28:36
7 and I want to understand how to handle this, 12:28:39
8 because this is a really unique position." 12:28:43

9 You don't normally have the studio also be 12:28:46
10 the director, also be the co-star, also be the 12:28:49
11 financier. 12:28:59

12 When signing on to the film, I thought 12:28:59
13 Sony had a greater hand in the film, which is part 12:29:01
14 of what gave me confidence. And that was really 12:29:04
15 shocking and unsettling. And so I asked her not 12:29:06
16 to say anything while I figured out how to handle 12:29:10
17 it to make it safest and make the workplace 12:29:16
18 tenable for me and others. 12:29:19

19 I also expressed that others had had 12:29:23
20 experiences, but I wasn't going to speak for them. 12:29:27

21 Q When did you find out what Sony's role was 12:29:29
22 in connection with the film? 12:29:35

23 ATTORNEY HUDSON: Objection. 12:29:37

24 A That was the first moment that I 12:29:42
25 understood them not to have as meaningful of a 12:29:44

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q Hi. Good afternoon. 13:38:04

2 I just want to walk through some of the 13:38:06

3 other allegations of sexual harassment. 13:38:09

4 One of the things that's alleged in the 13:38:16

5 amended complaint is, I believe that you're saying 13:38:18

6 that Justin complimented your outfit; is that 13:38:26

7 correct? 13:38:31

8 ATTORNEY HUDSON: Objection. 13:38:31

9 A No. 13:38:32

10 Q Are you saying that one of the instances 13:38:51

11 of sexual harassment or something that made you 13:38:52

12 otherwise uncomfortable was there was one day in 13:38:58

13 which Justin commented how much he liked your 13:39:03

14 outfit? 13:39:06

15 A No. 13:39:07

16 Q Did Justin ever say anything inappropriate 13:39:08

17 or that bothered you concerning an outfit that you 13:39:26

18 wore? 13:39:35

19 ATTORNEY HUDSON: Objection. 13:39:38

20 A There was an incident that made me 13:39:39

21 uncomfortable, yes. 13:39:50

22 Q And when was that incident? 13:39:53

23 A Late May of 2023. 13:39:58

24 Q Do you recall the date? 13:40:00

25 A I don't know the exact date, no. 13:40:02

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q And do you recall where that took place? 13:40:15
2 A Yes. 13:40:17
3 Q Where did it take place? 13:40:20
4 A On a set, a bar set when we were 13:40:21
5 rehearsing. 13:40:30
6 Q That was that bar scene? 13:40:30
7 A No, it was -- we were rehearsing that 13:40:32
8 scene, but, no, it was not the scene. It was when 13:40:35
9 I arrived to work. 13:40:37
10 Q And can you tell me what happened? 13:40:38
11 A Can you be more specific? Sorry. 13:40:42
12 Q Sure. 13:40:46
13 What about whatever happened there made 13:40:47
14 you feel uncomfortable? 13:40:50
15 A I was wearing a -- I had a newborn baby, 13:40:51
16 and I had a jacket on and -- that was covering my 13:40:58
17 dress underneath. And I bent down to pick 13:41:04
18 something up, and the jacket opened. And my dress 13:41:08
19 was low-cut because it was easier to feed my baby. 13:41:13
20 And Mr. Baldoni said in front of -- Justin said in 13:41:23
21 front of -- I remember in front of Jenny Slate, 13:41:31
22 and I don't remember specifically who else was 13:41:39
23 there, but he said, "I like your outfit," and he 13:41:42
24 gestured at the chest. 13:41:46
25 Q You just made a movement of your hand. 13:41:51

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 A Yes. 13:41:55

2 Q It's hard for the court reporter to mark 13:41:56

3 those down. 13:41:57

4 What do you mean he made a gesture of his 13:41:59

5 hand and said, "I like your dress"? 13:42:02

6 A He gestured across the chest. 13:42:04

7 Q Did he gesture across your chest or his 13:42:08

8 chest? 13:42:11

9 A He said, "I like your outfit." 13:42:12

10 Q He moved his hand up and down, like, above 13:42:17

11 and below his chest or your chest? 13:42:20

12 A I was standing in front of him, so I don't 13:42:22

13 know whose chest, but he didn't touch my chest -- 13:42:28

14 Q Okay. 13:42:28

15 A -- if that's what you're asking. 13:42:33

16 Q When he made the gesture in front of his 13:42:34

17 chest, was his arm closer to his chest or closer 13:42:37

18 to your chest? 13:42:41

19 A I don't recall. 13:42:45

20 Q And what were you doing during this time? 13:42:46

21 Was it during a rehearsal of some sort? 13:42:57

22 A We weren't rehearsing the scene yet, but I 13:42:59

23 was on the set to rehearse the scene. 13:43:03

24 Q And who else was present, if anyone? 13:43:05

25 A The person I remember most is obviously 13:43:11

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 Justin Baldoni. And the other person I remember 13:43:20
2 is Jenny Slate. I know there were other people in 13:43:23
3 the room, but I don't know who experienced that 13:43:28
4 other than the people that I mentioned. 13:43:39

5 Q And when you say "experienced that," you 13:43:41
6 mean who else saw it, who else witnessed it? 13:43:44

7 A Yeah. I -- there may have been others who 13:43:46
8 saw it and witnessed it. I don't know. 13:43:48

9 Q And I apologize for asking this again. 13:43:50

10 I think you said you were wearing a 13:43:55
11 low-cut dress; is that correct? 13:43:58

12 A Under my jacket, yes. 13:44:00

13 Q And was the low-cut dress to facilitate 13:44:01
14 breastfeeding? 13:44:12

15 A Yes. 13:44:14

16 ATTORNEY HUDSON: Objection. 13:44:15

17 THE WITNESS: Sorry. 13:44:17

18 Q Was the jacket or coat that you were 13:44:18
19 wearing, was that an item that you personally 13:44:23
20 owned or was it something that the studio 13:44:27
21 purchased for the movie? 13:44:30

22 A I was wearing my own clothes. 13:44:32

23 Q Was it part of your costume for the role? 13:44:34

24 A No. 13:44:41

25 Q That wasn't -- that jacket wasn't in the 13:44:41

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 role at all? 13:44:46

2 A No. 13:44:47

3 Q Was it part of a pre-approved wardrobe for 13:44:48

4 the scene? 13:44:56

5 A No, I was in my own clothes. This was 13:44:56

6 rehearsal. 13:45:00

7 Q And can you describe the coat in detail? 13:45:00

8 A It was a blue corduroy jacket. It's my 13:45:04

9 husband's coat. 13:45:13

10 Q Can you describe any other parts of it? 13:45:14

11 A Yeah. It's a -- I don't know how to -- 13:45:20

12 it's like a blazer style, I would want to say, but 13:45:27

13 an oversized blazer where the collar and 13:45:30

14 everything comes upward. 13:45:35

15 Q Is there a zip, zipper, or no? 13:45:37

16 A Buttons. 13:45:40

17 Q What was it made of, if you know? 13:45:41

18 A Corduroy. 13:45:47

19 Q So it wasn't fur; is that correct? 13:45:48

20 A Corduroy. 13:45:55

21 Q How long was the coat? 13:46:00

22 A To my thighs. 13:46:04

23 Q So would you say that's waist-length or 13:46:10

24 knee-length or ankle length -- I guess it's not 13:46:13

25 thigh-length, then, right? 13:46:16

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 ATTORNEY HUDSON: Objection. 13:46:18

2 A I don't know how else to describe it. It 13:46:19

3 was to my thighs. 13:46:21

4 Q Okay. And what color was it? 13:46:22

5 A Blue. 13:46:28

6 Q Was it a solid color or did it have a 13:46:29

7 print? 13:46:31

8 A It was solid. 13:46:31

9 Q And it closed with buttons; is that 13:46:33

10 correct? 13:46:36

11 A Yeah, there are buttons. 13:46:37

12 Q Not snaps? 13:46:39

13 A No. 13:46:41

14 Q Was Justin -- to your knowledge was Justin 13:46:42

15 able to see what you were wearing underneath the 13:46:48

16 coat? 13:46:51

17 A Not until I bent down, no. 13:46:52

18 Q And what happened when you bent down that 13:46:54

19 allowed him to see what you were wearing under the 13:47:00

20 coat? 13:47:03

21 A The coat opened up. 13:47:03

22 Q And when the coat opened up, it revealed 13:47:05

23 the dress? 13:47:12

24 A Well, can you be more specific what you're 13:47:12

25 asking? 13:47:22

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q Sure. 13:47:22

2 When the coat opened up, was it just one 13:47:23

3 button that opened up or a bunch of buttons that 13:47:26

4 opened up? Did the entire coat open up? 13:47:28

5 A I never said the buttons opened up. I 13:47:30

6 don't know that the buttons opened up. I know 13:47:32

7 that the coat was covering me. And when I bent 13:47:34

8 down, it opened and it exposed the upper region 13:47:38

9 under the coat. 13:47:43

10 Q And was the upper region underneath your 13:47:45

11 coat, was that clothed? 13:47:48

12 A I was wearing a dress. 13:47:52

13 Q Is that yes, it was clothed? 13:47:55

14 A Yes. 13:47:58

15 Q Do you know how the jacket popped open? 13:48:00

16 A I bent down. 13:48:05

17 Q Had that ever happened to you before when 13:48:06

18 you bent down with that jacket? 13:48:11

19 ATTORNEY HUDSON: Objection. 13:48:12

20 A Sometimes jackets open when you bend down. 13:48:13

21 I don't know with that jacket specifically. 13:48:17

22 Q And how long was the jacket popped open 13:48:20

23 for? 13:48:24

24 A I don't know. Briefly. 13:48:29

25 Q And when you say "briefly," do you mean 13:48:31

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 one minute? Less than a minute? 13:48:34

2 A I don't know. 13:48:38

3 Q It wasn't more than three minutes, was it? 13:48:39

4 A I don't believe so, no. 13:48:44

5 Q The dress that was underneath the jacket, 13:48:47

6 was that something that you personally owned or 13:48:56

7 was it something that the studio purchased for the 13:48:58

8 movie? 13:49:02

9 A They were my clothes. 13:49:02

10 Q And was it part of the costume for your 13:49:03

11 role? 13:49:07

12 A No. 13:49:08

13 Q And what was the dress made of? 13:49:08

14 A I don't know the exact materials. I think 13:49:18

15 it was cotton and -- I don't know what else. 13:49:23

16 Q And how long was the dress? 13:49:34

17 A To my ankles. 13:49:37

18 Q Was the dress a print or a solid color? 13:49:40

19 A Solid. 13:49:45

20 Q And what kind of neck did the dress have? 13:49:46

21 Was it V-neck or a rounded neck or a square neck? 13:49:52

22 A I don't know what you mean by "neck." 13:49:56

23 There were straps on the dress. 13:50:06

24 Q Was the neck cut low or higher or? 13:50:08

25 A Yeah, it was low. 13:50:16

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q Sorry for some of these questions. 13:50:17

2 Did your cleavage show? 13:50:25

3 A I believe so, yes. 13:50:27

4 Q Are you certain of that or you just 13:50:28

5 believe so? 13:50:31

6 A Well, you have to be more specific with 13:50:33

7 the question. 13:50:35

8 Are you talking about the dress or -- 13:50:36

9 Q Yeah, did the dress show your cleavage? 13:50:40

10 ATTORNEY HUDSON: Objection. 13:50:42

11 A Yes. 13:50:43

12 Q Did your nipples show? 13:50:45

13 A No, not that I'm aware of. 13:50:51

14 Q And the dress was specifically designed 13:50:58

15 for ease of breastfeeding; is that correct? 13:51:02

16 ATTORNEY HUDSON: Objection. 13:51:06

17 A I don't know what the dress was designed 13:51:07

18 for. I didn't design it. 13:51:09

19 Q Was that the purpose of your wearing the 13:51:12

20 dress, to make it easier to breastfeed? 13:51:15

21 A Yes. 13:51:18

22 Q Did you always wear those types of dresses 13:51:19

23 or shirts that made it easier to facilitate 13:51:24

24 breastfeeding in May of 2023? 13:51:27

25 A That was the only time I remember wearing 13:51:30

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 that dress. 13:51:35

2 Q What about other types of clothing, did 13:51:36

3 you wear other types of clothing in May of 2023 13:51:42

4 where there were either low-cut dresses or shirts 13:51:44

5 to facilitate the ease of breastfeeding? 13:51:48

6 A I don't recall. I don't -- I was 13:51:54

7 breastfeeding often, so -- I had a newborn baby, 13:52:06

8 so -- but I don't often wear low-cut clothing to 13:52:12

9 work. 13:52:21

10 Q Was that something important in May of 13:52:22

11 2023, that you wear something that made 13:52:23

12 breastfeeding easier for you? 13:52:26

13 ATTORNEY HUDSON: Objection. 13:52:28

14 A I didn't have much time to feed my baby, 13:52:28

15 so if there was a way in which I could remain as 13:52:41

16 covered as possible while breastfeeding, that was 13:52:47

17 always a goal for me. 13:52:55

18 Q You said that Justin commented on how much 13:52:56

19 he liked your outfit; is that correct? 13:53:03

20 A Mm-hmm, yes. 13:53:05

21 Q Do you recall what his exact words were? 13:53:06

22 A I believe he said, "I like your outfit." 13:53:08

23 It was the inflection and the gesture that 13:53:20

24 felt uncomfortable to me. 13:53:23

25 Q And you specifically recall him saying the 13:53:28

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

93

1 word, "outfit"? 13:53:32

2 A I believe so. 13:53:36

3 Q And then you said it was the -- the 13:53:38

4 gesture that made you feel uncomfortable. 13:53:42

5 What do you mean by -- what do you mean by 13:53:48

6 that? 13:53:49

7 A I mean it was the hand gesture that he 13:53:49

8 made. I also said it was the inflection, the way 13:53:52

9 he said it, and the context surrounding the 13:53:56

10 moment. 13:53:59

11 Q Can you tell me about the inflection that 13:54:00

12 made it uncomfortable? 13:54:03

13 A Can you be more specific with your 13:54:06

14 question? 13:54:11

15 Q Sure. 13:54:12

16 You used the term "inflection" as one of 13:54:12

17 the things that made you feel uncomfortable. 13:54:15

18 Do you mean the tone of his voice? 13:54:19

19 A I mean, it -- there was a knowing 13:54:21

20 inflection. It wasn't a casual, in passing 13:54:29

21 inflection. I also hadn't just walked in, so it 13:54:38

22 wasn't the moment he saw the outfit. It wasn't 13:54:41

23 until I bent down and the coat opened that I got 13:54:44

24 the compliment on my outfit. 13:54:47

25 Q And in terms of the inflection, do you 13:54:49

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 recall how that sounded? 13:54:54

2 A I recall how it felt. 13:54:58

3 Q Okay. How did it feel? 13:55:01

4 A I felt uncomfortable. I felt exposed. I 13:55:04

5 felt humiliated. I felt ashamed. And I felt 13:55:10

6 like -- I felt bad. 13:55:24

7 Q When Justin was saying that he liked your 13:55:28

8 outfit, do you know whether he was referring to 13:55:37

9 your coat or your dress or the combination of 13:55:38

10 both? 13:55:41

11 ATTORNEY HUDSON: Objection. 13:55:42

12 A It didn't feel like he was referring to 13:55:43

13 either. 13:55:49

14 Q Did it feel like he was referring to 13:55:53

15 something different than either the coat or the 13:55:55

16 dress? 13:55:57

17 A Yes. 13:56:02

18 Q What did it feel like he was referring to? 13:56:02

19 A It felt like he was referring to my chest 13:56:05

20 because he was gesturing. 13:56:08

21 Q And that gesture was with one hand; is 13:56:14

22 that correct? 13:56:18

23 A That's my recollection. 13:56:18

24 Q And the hand, did it go above his head 13:56:19

25 or -- 13:56:25

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 A No. 13:56:25

2 Q -- below his head? 13:56:26

3 A It was in the chest area. 13:56:27

4 Q And do you know how long that gesture 13:56:30

5 lasted for? 13:56:33

6 A Long enough for me to feel awful. 13:56:34

7 Q Did he do it a few times or just one time? 13:56:39

8 A Do what a few times? 13:56:43

9 Q The gesture with his hand. 13:56:46

10 A I don't -- it was a gesture. 13:56:48

11 Are you asking how many times his hand 13:56:55

12 pumped up and down? 13:56:58

13 Q I think I'm asking how many gestures he 13:57:00

14 made. 13:57:02

15 Was it one gesture or more than one 13:57:02

16 gesture? 13:57:05

17 ATTORNEY HUDSON: Objection. 13:57:05

18 A I don't understand your question. 13:57:06

19 Q You said that he made a gesture, right? 13:57:08

20 A Yes. 13:57:11

21 Q And the gesture was with one -- was it 13:57:11

22 with his right arm or his left arm? 13:57:14

23 A I don't remember which hand. 13:57:16

24 Q And you said his gesture was going over 13:57:17

25 his chest up and down, right? 13:57:20

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 A Yes. 13:57:22

2 Q And did he do that once or more than one 13:57:23

3 time? 13:57:26

4 A Did his hand go up and down more than one 13:57:26

5 time? 13:57:29

6 Q Yes. 13:57:29

7 A I mean, it went up and down, so it's one 13:57:31

8 gesture. 13:57:38

9 Q Okay. 13:57:39

10 A I'm not saying how many pumps it was. It 13:57:43

11 was the gesture covering the chest. 13:57:45

12 Q You don't know whether it was one or more 13:57:48

13 times? 13:57:51

14 A I don't understand your question. 13:57:51

15 Q Well, you indicated that it was a gesture 13:57:56

16 of where he went up, he went down -- 13:57:58

17 A He didn't go like this (indicating). He 13:58:00

18 did not do that. 13:58:04

19 Q What did he do exactly? 13:58:05

20 A (Indicating) "I like your outfit." 13:58:06

21 ATTORNEY HUDSON: Let the record reflect 13:58:11

22 the witness has demonstrated. 13:58:12

23 Q So he said, "I like your outfit." 13:58:13

24 And can you describe where he moved his 13:58:15

25 hand, from what part of his body to the other part 13:58:17

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 of his body? 13:58:21

2 A I would say from here to here 13:58:22

3 (indicating). 13:58:26

4 Q When you say "here," it looked to me that 13:58:27

5 it was maybe your solar plexus? 13:58:29

6 A No. I'm saying probably in the -- my 13:58:31

7 ribcage. 13:58:39

8 Q From -- so he made the gesture from the 13:58:41

9 ribcage to where? 13:58:44

10 A I mean, across where breasts would be. We 13:58:49

11 could be a bit more explicit, I think. 13:58:53

12 Q And did he stop at the chin or right below 13:58:55

13 the chin? 13:58:59

14 A Where breasts would be. 13:58:59

15 Q What did you say, if anything, after 13:59:01

16 Justin complimented your outfit? 13:59:11

17 ATTORNEY HUDSON: Objection. 13:59:14

18 A I don't remember, but I remember grabbing 13:59:16

19 my coat and covering myself. 13:59:20

20 Q Have you ever complimented anyone's outfit 13:59:22

21 or what they were wearing while making the film? 13:59:37

22 ATTORNEY HUDSON: Objection. 13:59:40

23 A I don't recall the specifics. 13:59:41

24 Q Do you recall complimenting somebody's 13:59:55

25 outfit generally? 13:59:59

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Transcript of Blake Lively

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1	ATTORNEY HUDSON: Objection.	14:00:00
2	A I -- that's a broad statement.	14:00:03
3	Have I ever complimented someone's outfit?	14:00:06
4	Q Do you recall it? During the making of	14:00:09
5	this film, do you recall complimenting anyone's	14:00:10
6	outfit.	14:00:14
7	ATTORNEY HUDSON: Objection.	14:00:14
8	A A specific recollection of a moment of	14:00:15
9	complimenting someone's outfit, specifically, no,	14:00:20
10	I don't have a specific memory.	14:00:23
11	Q Has anyone else ever complimented your	14:00:30
12	outfit or what you were wearing during the making	14:00:33
13	of the film?	14:00:35
14	ATTORNEY HUDSON: Objection.	14:00:35
15	A Yes.	14:00:42
16	Q Who else did that?	14:00:43
17	ATTORNEY HUDSON: Objection.	14:00:45
18	A I don't remember specifically, but I do	14:00:46
19	remember people being complimentary of the	14:00:54
20	wardrobe.	14:01:00
21	Q When you say "people," there was more than	14:01:02
22	one person that complimented your outfit during	14:01:05
23	the making of the film?	14:01:07
24	A Yes, I remember compliments on wardrobe.	14:01:09
25	Q Were you offended by any of those	14:01:12

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Transcript of Blake Lively

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1 comments? 14:01:19

2 A No. I never had anybody -- the context 14:01:20

3 surrounding the interaction I had with Justin 14:01:26

4 Baldoni. 14:01:29

5 Q Do you recall -- I may have asked you this 14:01:30

6 before. I believe you said in May of 2023. 14:01:42

7 Do you recall the specific date? 14:01:45

8 ATTORNEY HUDSON: Objection. 14:01:46

9 A I don't -- I don't know the exact date, 14:01:47

10 no. 14:01:54

11 Q Another instance of sexual harassment that 14:01:55

12 you've identified is that Justin called you or 14:02:00

13 what you were wearing sexy and hot. 14:02:06

14 Are you aware of that? 14:02:09

15 A Am I aware of what? 14:02:10

16 ATTORNEY HUDSON: Objection. 14:02:12

17 Q Are you aware that that's one of the 14:02:12

18 allegations that you're saying that was sexual 14:02:14

19 harassment is that Justin said that either what 14:02:17

20 you were or what you were wearing was sexy or hot? 14:02:21

21 A Can you be specific? You're saying "or." 14:02:25

22 Q Sure. Let me actually let you use your 14:02:28

23 own words. 14:02:31

24 Can you tell me what the circumstances 14:02:31

25 were when Justin used words like "sexy" or "hot"? 14:02:33

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Transcript of Blake Lively

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1 the movie? 14:04:18

2 A The bar was a set for the film. It was a 14:04:19

3 real bar, but it was used as a location in the 14:04:27

4 movie. 14:04:30

5 Q And do you recall what time of day that 14:04:31

6 was? 14:04:35

7 A It was early in the day. 14:04:36

8 Q And where were you standing when he made 14:04:39

9 these comments? 14:04:49

10 A In the bar set? 14:04:50

11 Q Yes. 14:04:53

12 You were standing in the bar set? Any 14:04:55

13 more description you can give me about where in 14:04:58

14 the bar -- in the bar you were standing? 14:05:00

15 A There was a table that we were all acting 14:05:05

16 around that was probably in the middle of the bar. 14:05:10

17 But we hadn't begun the scene yet, so we were in 14:05:16

18 the midst of the bar set. 14:05:22

19 Q And what happened specifically? 14:05:24

20 A With what? 14:05:29

21 Q With him using the terms "sexy" or "hot"? 14:05:31

22 A He asked me to remove a coat that I was 14:05:36

23 wearing, which was a wardrobe coat, which was a 14:05:40

24 part of the look that had been photographed and 14:05:47

25 shared for that scene. And when I arrived to set, 14:05:55

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Transcript of Blake Lively

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1 he asked me once I was on set amongst others -- I 14:06:02
2 remember once again Jenny Slate standing there -- 14:06:10
3 and he said, "Can you take off your coat?" 14:06:15
4 And I thought that it was a more 14:06:22
5 interesting outfit to wear the coat. I thought it 14:06:24
6 was more eclectic and dynamic. And he said, 14:06:26
7 "Well, we want to see it without the coat." 14:06:34
8 So I took the coat off, and under the 14:06:38
9 coat, I was wearing a onesie that was zipped low 14:06:41
10 with a lace bra peeking out, because the scene 14:06:48
11 after this is a sex scene or a hookup scene, 14:06:53
12 rather. And he asked me to take off the coat. 14:06:57
13 And I'm standing amongst many cast and crew and 14:07:03
14 extras, and I felt on display. And he said, "I 14:07:10
15 think you look sexy." 14:07:17
16 And I said, "That's not what I'm going 14:07:18
17 for." 14:07:22
18 And he said, "Oh, I'm sorry. Hot?" 14:07:23
19 And I said, "Not that either." 14:07:27
20 And then he said, "Ah, well, I guess I 14:07:29
21 missed the HR meeting." 14:07:32
22 And became -- looked at me. I remember 14:07:34
23 him being aware of Jenny Slate and getting a 14:07:38
24 little huffy and walked off. And I performed the 14:07:42
25 scene without the coat. 14:07:51

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Transcript of Blake Lively

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1 Q When you say -- used the term "huffy," was 14:07:55
2 he getting huffy or you were getting huffy? 14:07:58
3 A It felt like he was. 14:08:01
4 Q And you said that one of you walked off? 14:08:02
5 A He did. 14:08:07
6 Q Were other people wearing onesies at that 14:08:08
7 time in that scene? 14:08:19
8 A Yes. 14:08:20
9 Q Who else was wearing onesies in that 14:08:22
10 scene? 14:08:32
11 A The characters I recall were -- Justin 14:08:32
12 Baldoni was wearing it for his character. Jenny 14:08:35
13 Slate was wearing it for her character. And 14:08:39
14 Hasan Minhaj was wearing it for his. 14:08:44
15 Q Did you ever have a conversation with 14:08:48
16 Justin about that incident? 14:09:04
17 A Yes. 14:09:08
18 Q When did you have a conversation with him 14:09:09
19 about it? 14:09:11
20 A My recollection is there was more than one 14:09:12
21 occasion. 14:09:22
22 Q Do you recall the first one after the 14:09:22
23 actual event? 14:09:26
24 A Yes. 14:09:29
25 Q Where did that take place? 14:09:30

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Transcript of Blake Lively

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1 A On the set. 14:09:33

2 Q And did you initiate that conversation or 14:09:34

3 did he? 14:09:38

4 A He -- he did. 14:09:39

5 Q What did he say? 14:09:45

6 A He attempted to excuse and justify and 14:09:47

7 backpedal. He said that -- he acknowledged that 14:10:08

8 he -- I don't know the exact words, but that he, 14:10:19

9 you know, is someone who makes mistakes. 14:10:25

10 And he wasn't making points that I felt 14:10:30

11 were coherent. I didn't understand quite what he 14:10:35

12 was saying, and I don't believe Jenny did either. 14:10:39

13 She then jumped in to talk about dynamics 14:10:45

14 on a set and how uncomfortable it can be when you 14:10:54

15 are getting unwarranted comments. And I -- he 14:10:57

16 never asked me if I was okay. He never told me 14:11:10

17 that that was inappropriate that he personalized 14:11:18

18 those comments, and that it would never happen 14:11:22

19 again, and that he understood the mistake that had 14:11:24

20 been made and acknowledged that -- what had 14:11:27

21 happened. 14:11:32

22 And I never felt reassurance that he 14:11:34

23 understood to tell me that he wouldn't put me in 14:11:38

24 that situation again. I understood that he knew 14:11:49

25 he had made a mistake, but it felt like he was 14:11:52

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Transcript of Blake Lively

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1 trying to get me on board with understanding why 14:11:57
2 that was okay. 14:12:02

3 Q What did he say that gave you the 14:12:03
4 indication that he was trying to get you on board 14:12:07
5 with -- with this being okay? 14:12:10

6 A Like I said, I don't remember the specific 14:12:12
7 words he said because he wasn't really making a 14:12:15
8 lot of coherent points. He had been in a -- what 14:12:20
9 felt like a retaliatory mood since I said to him, 14:12:26
10 "That's not what I'm going for," and "Not that 14:12:31
11 either." 14:12:35

12 That was something that I knew of him when 14:12:40
13 I expressed a boundary, that behavior. And I was 14:12:42
14 always very uncomfortable afterwards because I 14:12:47
15 knew that I had to be in scenes and maintain some 14:12:49
16 level of chemistry and camaraderie with this 14:12:55
17 person. 14:13:00

18 So it was a very -- those were all very 14:13:00
19 unsettling moments where there was a lot coming 14:13:06
20 up. 14:13:09

21 Q Did he ever say, when you spoke to him 14:13:13
22 about it, that -- did he ever ask you whether he 14:13:16
23 had crossed the line? 14:13:21

24 A I think I made it pretty clear he had 14:13:23
25 crossed the line. 14:13:25

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q Did he ever say, though, "Did I cross the 14:13:26
2 line?" Did he ever ask you? 14:13:29

3 ATTORNEY HUDSON: Objection. 14:13:33

4 A I believed him to have an understanding 14:13:38
5 that he crossed the line from his behavior. 14:13:39

6 Q And I understand that you have that 14:13:44
7 understanding, but as you sit here today, you 14:13:46
8 don't recall whether or not he said -- he asked 14:13:47
9 you whether he crossed the line; is that correct? 14:13:52

10 A I think it was very obvious that I felt he 14:13:54
11 had crossed the line. I can't tell you what's in 14:13:59
12 his head, but I can tell you that I was quite 14:14:04
13 clear. 14:14:07

14 Q Right. I'm just asking for your 14:14:08
15 recollection of what he said right now. And so if 14:14:10
16 you recall, great. If you don't, that's okay too. 14:14:14

17 But did he -- do you recall him asking you 14:14:16
18 if he had crossed the line? 14:14:19

19 A I don't recall him asking me anything. I 14:14:21
20 recall him speaking at me. 14:14:27

21 Q Okay. Was this incident on the same day 14:14:29
22 that he complimented your outfit or was this a 14:14:36
23 different day? 14:14:40

24 A It was. 14:14:41

25 Q The same day? 14:14:42

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Transcript of Blake Lively

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1 So we had talked about what you were 14:22:15
2 wearing, your personal clothes earlier. And now 14:22:17
3 you -- you know, you say that Justin said "hot" 14:22:21
4 and "sexy." And I'm trying to find out what you 14:22:24
5 were wearing when he said that. 14:22:28

6 ATTORNEY HUDSON: Objection. 14:22:30

7 A When he said that, it was after he asked 14:22:31
8 me to remove the coat, the wardrobe coat from over 14:22:33
9 top of the onesie that I was wearing. So at that 14:22:38
10 point, I was wearing a onesie that was zipped low 14:22:41
11 with a burgundy lace bra peeping out. 14:22:46

12 Q And what were you wearing that was part of 14:22:52
13 the wardrobe for the scene? 14:22:55

14 A That. 14:22:56

15 Q What about the coat? 14:22:58

16 A Yes, the coat was also wardrobe for the 14:22:59
17 scene. 14:23:02

18 Q Had the coat been approved in advance? 14:23:04

19 A That was my understanding. 14:23:07

20 Q By whom? 14:23:08

21 ATTORNEY HUDSON: Objection. 14:23:16

22 A I don't know who made approvals, but when 14:23:17
23 you do a fitting, you take photos for any of the 14:23:19
24 decision makers to approve. And if there is an 14:23:22
25 issue, the wardrobe designer will come to you and 14:23:26

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Transcript of Blake Lively

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1 A The time in which he told me I looked sexy 14:27:42
2 and I looked hot, yes, I am claiming that. 14:27:48
3 Q Any other time? 14:27:51
4 A That he told me I looked sexy that I'm 14:27:54
5 claiming? 14:27:58
6 Q Yes. 14:27:59
7 A Not me specifically, no. 14:27:59
8 Q Were you uncomfortable or felt like you 14:28:01
9 were harassed as a result of hugging and touching? 14:28:13
10 ATTORNEY HUDSON: Objection. 14:28:17
11 A The first time, no. 14:28:17
12 Q When was the first time? 14:28:28
13 A Well, there were a lot of hugs. 14:28:29
14 Q Do you recall the first time? 14:28:43
15 A No. 14:28:46
16 Q Okay. 14:28:49
17 A I recall the first time on set, the first 14:28:50
18 day on set. 14:28:54
19 Q And are you alleging that you felt 14:28:56
20 uncomfortable or sexually harassed as a result of 14:28:59
21 hugging on the set? 14:29:06
22 ATTORNEY HUDSON: Objection. 14:29:09
23 A There is more context. 14:29:11
24 Q Go ahead. 14:29:15
25 A The first day on set, there were a lot of 14:29:18

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Transcript of Blake Lively

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1 hugs. And I made an announcement. I said, okay,
2 great. We all hugged each other. We all liked
3 each other. We're all happy to be here. Let's
4 not do that every day. Like, we got it. We're
5 all happy to be here. Let's do our work.

6 And the rest of the crew, to my
7 recollection, didn't insist upon it. It was -- if
8 there was an organic moment, they may hug each
9 other, I'm not sure.

10 But the difference with Justin and Jamey
11 is that they would come for the hug every day.
12 And if you didn't hug them, they would become
13 prickly and standoffish and shut down.

14 So my issue with the hugging and touching
15 is when a boundary is expressed and the boundary
16 is not respected, or when the boundary affects the
17 work because of the person's reaction to receiving
18 a boundary, physical boundary.

19 Q And do you recall specifically any
20 instances where you didn't provide a hug to Justin
21 and/or Jamey and you felt like you were somehow
22 punished or responded to in a negative way?

23 A I often tried to busy myself so that I
24 didn't have to give hugs. Sometimes it was easier
25 just to do it and get it over with so that the

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1 work wouldn't be affected, because I found Justin 14:31:41
2 would be less collaborative. 14:31:46

3 And so -- I remember on a flower shop day, 14:31:52
4 he was attempting to give a hug, and I really, 14:32:01
5 really didn't want to be touched or be forced to 14:32:06
6 touch him. And so I was viewing the shop in awe 14:32:10
7 -- and the shop was amazing -- but I really busied 14:32:16
8 myself with remarking on the production design and 14:32:21
9 every detail so that I could avoid having to hug 14:32:25
10 him. 14:32:29

11 And he, you know, followed along behind 14:32:29
12 me, and that was always -- felt like it was always 14:32:32
13 expected that we do that. 14:32:37

14 Q And how many times did you not hug Justin 14:32:39
15 and he responded negatively? 14:32:55

16 A My recollection is that every time I 14:33:00
17 didn't hug him, he would shut down. 14:33:03

18 Q Was that every day? 14:33:09

19 A No. There were some days where it was 14:33:10
20 easier just to hug him. 14:33:13

21 Q But every day that you didn't hug him, 14:33:15
22 your testimony is that he would shut down? 14:33:18

23 A My recollection is that he would become 14:33:21
24 prickly, yes. 14:33:26

25 Q And what do you mean by "prickly"? 14:33:27

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Transcript of Blake Lively

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1 A I mean, there -- the warmth and -- his 14:33:31
2 warmth felt tied to physical affection. And while 14:33:50
3 that's something I can understand in a personal 14:33:54
4 setting, in a work setting, it was really hard. 14:34:00
5 Q Have you ever used the word "sexy" or 14:34:04
6 "hot" with Justin referring to yourself? 14:34:06
7 A To myself? 14:34:10
8 Q Yes. 14:34:12
9 A Not to my recollection, to me personally. 14:34:14
10 Q Have you ever used the word "sexy" or 14:34:19
11 "hot" with Justin to refer to something you were 14:34:22
12 wearing or that you proposed to wear in the film? 14:34:24
13 A In the context of the film, in the 14:34:27
14 creative context, yeah, I would use the word 14:34:32
15 "sexy." 14:34:37
16 Q More than once? 14:34:37
17 A I don't recall, but I would imagine so. 14:34:39
18 Q And what about "hot," did you use that 14:34:46
19 term in connection with filming? 14:34:50
20 ATTORNEY HUDSON: Objection. 14:34:53
21 A I don't recall. 14:34:55
22 Q You might have or you might have not; you 14:34:56
23 just don't recall? 14:35:00
24 ATTORNEY HUDSON: Objection. 14:35:00
25 A I don't recall. But only in the context 14:35:01

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1 A Yes. 14:38:05

2 Q Can you explain who walked into your 14:38:06

3 trailer uninvited while you were undressed or 14:38:11

4 breastfeeding? 14:38:14

5 A Jamey Heath. 14:38:14

6 Q Anyone else? 14:38:17

7 A I have a memory of my hairdresser locking 14:38:23

8 the door to hair and makeup because Jamey and 14:38:31

9 Justin would often pop by. So I know that that 14:38:37

10 was a consideration and an alteration we had to 14:38:43

11 make in the way that we worked. I had never 14:38:48

12 locked the trailer door consistently on a film 14:38:52

13 before. 14:38:55

14 Q Can you recall a specific time that either 14:38:55

15 Jamey or Justin walked into the trailer -- into 14:39:01

16 your trailer uninvited while you were undressed or 14:39:05

17 breastfeeding? 14:39:08

18 A Yes. 14:39:09

19 Q What do you recall? 14:39:09

20 A I recall Jamey Heath walking in or trying 14:39:12

21 to walk in and me telling him not to come in, and 14:39:21

22 him insisting on coming in anyway or the meeting 14:39:25

23 would be canceled. 14:39:27

24 Q When was that? 14:39:28

25 A Day two of production -- of filming. 14:39:31

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1 Q Did -- did you tell Jamey Heath that that 14:39:34
2 made you feel uncomfortable? 14:39:48

3 A I did. 14:39:50

4 Q What did you say to him? 14:39:54

5 A I recounted what had happened, and I told 14:39:55
6 him that that wasn't okay. And he said -- yeah, I 14:40:09
7 told him, you know, that I had told him to turn 14:40:16
8 around, and it's not okay to insist on that anyway 14:40:18
9 and that he could never do that again. And then I 14:40:23
10 told him to turn around and that he was looking 14:40:27
11 right at me. And he expressed that he liked to 14:40:29
12 make eye contact with people. He had a habit of 14:40:34
13 making eye contact with people when speaking with 14:40:37
14 them, so that's why that happened. 14:40:40

15 Q He was saying that why he went in there 14:40:43
16 was because he wanted to have eye contact with you 14:40:47
17 when speaking to people? 14:40:49

18 ATTORNEY HUDSON: Objection. 14:40:50

19 A No. He was saying that's why he looked -- 14:40:51

20 Q That's -- 14:40:55

21 A -- after I told him not to. 14:40:57

22 Q This is the second day of production, 14:40:58
23 correct? 14:41:02

24 A Yes. 14:41:02

25 Q And do you know what time of day it was 14:41:03

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1 that he came into your trailer? 14:41:04

2 A Evening. 14:41:06

3 Q And was the trailer unlocked? 14:41:07

4 A I don't know if it was unlocked at that 14:41:12

5 point. He attempted to come in and we stopped him 14:41:15

6 from coming in. 14:41:18

7 Q When you say "we," who are you referring 14:41:19

8 to? 14:41:21

9 A My hair and makeup artists. 14:41:21

10 Q Did you have your security there at the 14:41:23

11 time? 14:41:25

12 A In my trailer, no. 14:41:26

13 Q Outside your trailer? 14:41:28

14 A I don't know where they were standing at 14:41:31

15 that moment. 14:41:33

16 Q The name of your security person is Kevin, 14:41:33

17 correct? 14:41:36

18 ATTORNEY HUDSON: Objection. 14:41:36

19 A We have different people who rotate. 14:41:37

20 Q But is there -- was there always 14:41:39

21 someone -- a security person outside your trailer? 14:41:42

22 ATTORNEY HUDSON: Objection. 14:41:45

23 A Not necessarily stationed right outside of 14:41:46

24 the hair and makeup door. They patrol. 14:41:50

25 Q Do you know -- as you sit here today, do 14:41:53

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1 you recall that specific second day of production, 14:41:56
2 whether or not there was a security person outside 14:42:00
3 your trailer? 14:42:01

4 ATTORNEY HUDSON: Objection. 14:42:03

5 A I don't recall, no. I was inside the 14:42:05
6 trailer, so I wouldn't have seen who was standing 14:42:09
7 there. 14:42:12

8 Q Did you ever call out for security or ask 14:42:12
9 for security to come in and take Jamey away? 14:42:16

10 ATTORNEY HUDSON: Objection. 14:42:19

11 A No. 14:42:24

12 Q And how long was Jamey in your trailer 14:42:24
13 for? 14:42:26

14 A I don't know exactly, but I would say 14:42:32
15 around five minutes. 14:42:34

16 Q And what was discussed during the five 14:42:36
17 minutes that he was in your trailer? 14:42:39

18 A We were meant to have a production meeting 14:42:45
19 that night, and I -- he came to my trailer as I 14:42:47
20 was -- we were going to have a production meeting 14:42:58
21 in my trailer. And he came to the hair and makeup 14:43:00
22 trailer as I was getting my body makeup removed 14:43:03
23 and my wig off and -- so that I could wrap out 14:43:06
24 hair and makeup and then I could then go into the 14:43:11
25 -- my own trailer and I have a meeting with them. 14:43:16

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 He unexpectedly came to my trailer, 14:43:18
2 knocked on the door, said, "We've got to talk." 14:43:21
3 I said, "We can't talk right now. I'll be 14:43:24
4 there in a few minutes. I'm getting done as fast 14:43:27
5 as I can so we can have this meeting." 14:43:29
6 He said, "Oh, no, we've got to talk 14:43:29
7 now" -- 14:43:33
8 (Reporter clarification.) 14:43:33
9 THE WITNESS: From where? 14:43:37
10 (Reporter clarification.) 14:43:44
11 A I said, "I'll meet you in there in a 14:43:44
12 minute. I'm getting -- I'm undressed. I'm 14:43:48
13 getting ready for the meeting. I'll be there in 14:43:50
14 just a minute." 14:43:52
15 And he said, "If we don't meet now, we 14:43:53
16 can't do that meeting." 14:43:55
17 And that meeting was very important to me 14:43:56
18 because it was to discuss other behavior I had 14:44:00
19 experienced earlier that day that was concerning 14:44:03
20 to me. 14:44:06
21 So I said, "Okay, fine, you can come in." 14:44:09
22 And he came in and I said, "Okay, you can 14:44:12
23 come in, but please don't look. Can you turn 14:44:15
24 around?" 14:44:18
25 So he turned around and he faced the wall. 14:44:18

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 And I was in front of the hair and makeup mirror 14:44:21
2 as my team was working -- they call it 14:44:26
3 double-teaming when they're both working at the 14:44:29
4 same time to either get you ready or disassemble 14:44:32
5 you. 14:44:34
6 And I was helping as well so that we could 14:44:35
7 work quickly. And Jamey said that the meeting had 14:44:40
8 to happen on my time, the meeting we were about to 14:44:44
9 have; that it -- because of my turnaround, which 14:44:49
10 is the time -- from the time that I am done with 14:44:55
11 work until the time I start again, my turnaround 14:44:57
12 was 12 hours. 14:45:00
13 And he said, "This meeting has to be on 14:45:01
14 your clock. We don't have time for this." 14:45:03
15 And I said, "This isn't a personal 14:45:05
16 meeting. This is a production meeting to discuss 14:45:08
17 how to make the set better and smoother." 14:45:10
18 And he was arguing for it to be I on my 14:45:19
19 personal time. And I said, "My personal time is 14:45:22
20 important to me because I have a newborn baby. 14:45:24
21 When I go home I prepare for the next day. I feed 14:45:27
22 my baby. I work out. I have a lot of 14:45:30
23 responsibilities. I really need my time, and this 14:45:32
24 is not a personal meeting; it's a production 14:45:35
25 meeting." 14:45:37

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 And as I'm having this negotiation with 14:45:38
2 him, I turn to him and he's staring straight at 14:45:40
3 me. He's no longer facing the wall. He's staring 14:45:46
4 straight at me. 14:45:49

5 And I said, "Jamey, what are you doing? 14:45:50
6 You said you would turn around." 14:45:54

7 "Oh, oh, sorry. I like to make eye 14:45:55
8 contact with people when I talk to them." 14:45:57

9 And I said, "You need to leave." 14:45:59

10 And so he left the trailer. And I 14:46:01
11 finished -- I finished getting ready. I was 14:46:04
12 incredibly shaken. My memory is my hair and 14:46:12
13 makeup -- the women who did my hair and makeup 14:46:18
14 were shaken as well. 14:46:24

15 And then I finished doing my work and I 14:46:28
16 went in and I took the meeting. 14:46:32

17 Q When you said he was looking at you, was 14:46:33
18 he looking in your eyes or somewhere else? 14:46:42

19 A Well, when I turned, he was fully facing 14:46:43
20 me and I was topless. So I don't know all of the 14:46:46
21 contours of my body that his eyes were on. 14:46:52

22 Q Okay. And when you were topless, did you 14:46:54
23 have body makeup on? 14:46:57

24 A Yes. 14:46:58

25 Q And as you sit here today, you don't 14:46:59

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 remember where on your body or your eyes that he 14:47:05
2 was looking at that time; is that correct? 14:47:08
3 ATTORNEY HUDSON: Objection. 14:47:10
4 A I remember turning around and he was 14:47:11
5 facing me, topless, when I said, "The only way you 14:47:14
6 can come in is if you turn around and face that 14:47:17
7 wall." 14:47:19
8 And he was faced the exact opposite 14:47:20
9 direction, facing me. 14:47:23
10 Q Right. I'm just trying to find out, like, 14:47:25
11 where his eyes were at the time that you turned 14:47:26
12 around. 14:47:28
13 Were his eyes at your eyes looking at you? 14:47:29
14 ATTORNEY HUDSON: Objection. 14:47:32
15 A Where his eyes were, I remember feeling 14:47:34
16 like he was looking at my body. So that's my 14:47:36
17 memory. 14:47:41
18 Q Okay. And when you say you remember 14:47:41
19 feeling like he was looking at your body, you 14:47:46
20 don't have a recollection that he actually was 14:47:48
21 looking at your body, but it felt like that; is 14:47:50
22 that correct? 14:47:52
23 A Yeah, I mean, the guy was -- the only way 14:47:53
24 he could come in the trailer, which I wasn't 14:47:58
25 comfortable with in the first place, is if he was 14:48:00

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Conducted on July 31, 2025

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1 facing the wall. Then I turn around and he's 14:48:03
2 facing me, topless. 14:48:05
3 Q Okay. One of the other things in your 14:48:10
4 complaint talks about "drafting a graphic orgasm 14:48:19
5 scene." 14:48:22
6 Do you recall that? 14:48:25
7 A If I recall what? 14:48:26
8 Q That there was a -- some sort of or -- 14:48:27
9 orgasm scene, a graphic orgasm scene that was 14:48:30
10 drafted that bothered you or you felt you were 14:48:35
11 harassed by? 14:48:39
12 ATTORNEY HUDSON: Objection. 14:48:40
13 A It wasn't that there was that scene in the 14:48:41
14 movie; it was the experience surrounding it that 14:48:44
15 felt upsetting. 14:48:50
16 Q What experience was there around that 14:48:53
17 scene? 14:48:57
18 A When I expressed my discomfort with the 14:48:57
19 fact that the scenes had become more gratuitous 14:49:09
20 and they felt in somewhat cases -- in some cases 14:49:16
21 somewhat pornographic to me, Justin Baldoni, 14:49:22
22 instead of speaking as a filmmaker about the 14:49:29
23 characters, attempted to, what I felt, convince me 14:49:33
24 to do the scenes by giving me personal reasons as 14:49:40
25 to why those scenes existed. 14:49:43

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q And what did he say? 14:49:47

2 A To which one? 14:49:51

3 Q To why those scenes existed, any one. 14:49:56

4 A The characters climaxing at the same time, 14:50:01

5 he told me that he and his wife orgasm at the same 14:50:13

6 time and asked me if my husband and I do the same. 14:50:21

7 When I said that the scenes felt 14:50:25

8 pornographic, he said -- he shared with me that 14:50:30

9 he, as he put it, had been previously addicted to 14:50:36

10 pornography, and so he understood it very well. 14:50:42

11 And that the scenes were not in fact pornographic, 14:50:46

12 but instead they were told through the female gaze 14:50:49

13 because this is what women wanted to see; that 14:50:52

14 women often see -- that women want to see 14:50:55

15 themselves being pleasured on camera. 14:51:06

16 There was a scene that he was proposing in 14:51:11

17 which he brings the character -- his character 14:51:13

18 Ryle brings the character Lily to orgasm on 14:51:19

19 camera, and I felt like I would be mortified to 14:51:23

20 shoot something like that at this stage in my life 14:51:30

21 and career and being the mother of four kids, and 14:51:32

22 given that that was not in the understanding of 14:51:36

23 the script that I came into the film with. 14:51:39

24 He told me that those were some of his 14:51:45

25 most precious memories, and I don't remember the 14:51:48

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 exact words he used, but between him and his wife 14:51:52
2 when he would bring her to orgasm. And she would 14:51:55
3 ask to then, I guess, do what needed to happen for 14:52:00
4 him, and he would say, no, that's enough. 14:52:06
5 That was -- 14:52:10
6 Q So was this in connection with the 14:52:11
7 creation of a scene? 14:52:13
8 ATTORNEY HUDSON: Objection. 14:52:16
9 A Was what in connection with the creation 14:52:17
10 of a scene? 14:52:20
11 Q This discussion about what -- how the sex 14:52:20
12 scene should go, was he discussing with you why he 14:52:24
13 felt like the sex scene should go one way versus 14:52:28
14 another? 14:52:34
15 A He was using personal experiences and 14:52:34
16 descriptives in a conversation that my intention 14:52:37
17 was to discuss the gratuitous sex that I felt 14:52:40
18 had -- I felt -- it was added, but I felt it was 14:52:47
19 gratuitous -- that had been added to the script. 14:52:50
20 And my intention was to have a creative discussion 14:52:52
21 about the sex scenes. And they made a surprising 14:52:54
22 and really disturbing departure into personal 14:52:58
23 conversations. 14:53:03
24 Q Where did that meeting take place? 14:53:09
25 A At my office. 14:53:10

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q And what was the date of that meeting? 14:53:11
2 A I don't remember. April of 2023. 14:53:13
3 Q Was there any other occasion that Jamey 14:53:16
4 walked into your trailer uninvited while you were 14:53:24
5 undressing or breastfeeding? 14:53:31
6 A I remember them often, both them, being 14:53:35
7 Justin and Jamey, coming to my trailer to speak. 14:53:39
8 And when I was in my trailer, I was more often 14:53:46
9 than not, if I wasn't expecting visitors, I was 14:53:48
10 more often than not topless. 14:53:53
11 Q So -- and did you lock your door? 14:53:56
12 A I started locking my door, yeah. 14:54:01
13 Q So you testified about the second day of 14:54:03
14 production when Jamey came in. 14:54:07
15 What were the other days that either 14:54:11
16 Justin or Jamey came in uninvited? 14:54:12
17 A I don't remember specifically. I remember 14:54:17
18 they often wanted to meet while I was in my 14:54:19
19 trailer. 14:54:22
20 Q And while they often wanted to meet while 14:54:23
21 you were in your trailer, did they actually go 14:54:26
22 into your trailer without your permission while 14:54:29
23 you were undressed or breastfeeding? 14:54:30
24 A I don't remember how many times that 14:54:38
25 happened. I do remember that I began to adjust 14:54:44

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 the work to anticipate that. So I had a robe at
2 the ready. And there were ways in which I could
3 still meet with them, if needed, in my trailer in
4 a way where I was able to be covered.

14:54:50

14:54:55

14:54:57

14:55:03

5 Q Did you ever invite Jamey or Justin into
6 your trailer while you were breastfeeding?

14:55:07

14:55:11

7 A I don't recall if I invited them in, but I
8 would breastfeed while working as long as I felt
9 comfortable and covered in a way where I felt like
10 I could offer that consent.

14:55:18

14:55:25

14:55:31

14:55:35

11 Q Did you ever actually put anything in
12 writing where you invited Justin or Jamey into
13 your trailer while you were breastfeeding to go
14 over lines?

14:55:37

14:55:41

14:55:45

14:55:48

15 A While I was breastfeeding, no, not that I
16 recall.

14:55:50

14:55:53

17 Q What about while you were pumping?

14:55:53

18 A I think you're referencing a specific
19 text, and I don't know if I was pumping at the
20 time that he entered the trailer. My recollection
21 is sharing what I was doing. It wasn't an
22 immediate invitation.

14:55:55

14:56:07

14:56:15

14:56:19

14:56:24

23 Q It wasn't an immediate invitation, meaning
24 he should come in later, is that what you meant?

14:56:26

14:56:30

25 A No, I'm saying it wasn't explicit. But I

14:56:33

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Transcript of Blake Lively

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1 would breastfeed and pump while working as long as 14:56:35
2 I felt that I was covered and was able to offer 14:56:40
3 consent to do it in a way where I was comfortable. 14:56:45

4 Q And as you sit here today, are you sure 14:56:50
5 that -- actually, strike that. 14:56:54

6 Did other people from the cast and crew go 14:56:58
7 into your trailer while you were breastfeeding? 14:57:02

8 ATTORNEY HUDSON: Objection. 14:57:08

9 A Nobody insisted on entering when I asked 14:57:08
10 them not to, other than the circumstances I've 14:57:14
11 told you. 14:57:20

12 Q Did you ever tell Jamey or Justin that you 14:57:21
13 had never seen pornography before? 14:57:36

14 A Yes. In an attempt to change the subject 14:57:42
15 when Justin mentioned his pornography addiction, I 14:57:48
16 said that as a deflection, because I couldn't 14:57:55
17 relate. I didn't understand enough about it. 14:57:58

18 Q Would it surprise you to learn that Justin 14:58:00
19 did not ever have a pornography addiction? 14:58:04

20 A It would surprise me to learn that because 14:58:07
21 he told me he did. 14:58:10

22 Q When he told you that he did, did you say, 14:58:12
23 "Stop, I don't want to hear this," or anything 14:58:16
24 like that? 14:58:20

25 A By saying, "I've never seen it" and 14:58:20

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Transcript of Blake Lively

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1	Q	Sure.	15:01:15
2		Are you claiming that as part of your	15:01:15
3		lawsuit, that it was sexual harassment that either	15:01:17
4		Justin or Jamey disclosed to the cast and crew	15:01:20
5		that you never looked at pornography?	15:01:25
6		ATTORNEY HUDSON: Objection.	15:01:27
7	A	I felt upset and disturbed and exposed	15:01:28
8		that an effort at deflecting something that he had	15:01:37
9		said that felt like it had crossed a line, instead	15:01:42
10		of him taking that and not doing it anymore, that	15:01:49
11		he took that and used that in front of other crew	15:01:53
12		members in the workplace.	15:02:00
13	Q	And is this just Justin or Jamey also?	15:02:02
14	A	Jamey was always around Justin. They were	15:02:05
15		a pair. So my memory of them together on set and	15:02:10
16		that was them together.	15:02:20
17	Q	Did you actually overhear Justin or Jamey	15:02:21
18		tell crew members or cast members that you never	15:02:25
19		looked at pornography?	15:02:32
20	A	Yes, I remember hearing that.	15:02:36
21	Q	You heard it from them directly?	15:02:39
22	A	I remember hearing from that from Justin,	15:02:41
23		yes.	15:02:45
24	Q	And Justin said that in front of you?	15:02:46
25	A	Yes.	15:02:49

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 Q And who did he tell? 15:02:49

2 A I don't remember specifically. I remember 15:02:51

3 him speaking about pornography in a casual way. 15:03:01

4 And he said, "Oh, Blake doesn't know anything 15:03:13

5 about it; she's never seen it." 15:03:20

6 Q When was this? What date? 15:03:22

7 A I don't remember what date. 15:03:24

8 Q Do you remember the month? 15:03:25

9 A It would have been in May of 2023. 15:03:26

10 Q Did you bring this up with Ange? 15:03:28

11 A I don't remember if I made it to that. 15:03:34

12 Q Did you bring it up with anybody at Sony? 15:03:40

13 A Eventually, yes. 15:03:43

14 Q In May or June, did you bring it up to 15:03:47

15 them? 15:03:51

16 A No. I don't know if I made it to that. 15:03:52

17 Like I said, Ange shut me down quickly, telling me 15:03:55

18 I couldn't file an HR claim through her, through 15:03:59

19 Sony. 15:04:03

20 Q Who was the -- who was there when Justin 15:04:03

21 was saying that you had never seen pornography? 15:04:12

22 Who in the cast or crew were present for that? 15:04:18

23 ATTORNEY HUDSON: Objection. 15:04:20

24 A I don't remember specifically. I remember 15:04:23

25 the feeling more than I remember the specifics. 15:04:31

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 A Can you be more specific? 15:41:23

2 Q Sure. 15:41:24

3 Did Leslie Sloane call you and tell you 15:41:25

4 that she received information from Stephanie Jones 15:41:29

5 about a smear campaign or something similar to 15:41:38

6 that? 15:41:39

7 A She did not. 15:41:39

8 Q Did you learn from Leslie Sloane that 15:41:40

9 there were text messages in Jen Abel's phone? 15:41:46

10 A No. 15:41:51

11 Q Who did you learn that from? 15:41:52

12 A Ashley Avignon. 15:41:53

13 Q Who is that? 15:41:56

14 A She's a friend of mine. 15:41:58

15 Q And what did she tell you? 15:42:00

16 A She said that a woman that she knows named 15:42:04

17 Stephanie Jones was trying to get in touch with 15:42:13

18 me. She gave me more details. 15:42:20

19 Q When did she tell you that? 15:42:25

20 A Late August of 2024. 15:42:27

21 Q And did she tell you that in writing or on 15:42:32

22 the telephone? 15:42:37

23 A On the phone. 15:42:38

24 Q And what else did she tell you? 15:42:39

25 A She told me that she works with a woman in 15:42:47

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Transcript of Blake Lively

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1 a -- I think she's an interior designer and -- the 15:42:56
2 woman's name is Stephanie Jones -- and that she's 15:43:01
3 a publicist, and that she has a phone which 15:43:06
4 contains the most disturbing messages she's ever 15:43:12
5 read in her 20 to 30-plus-year career, that as a 15:43:18
6 mother and woman, she was sobbing reading the 15:43:26
7 messages. 15:43:28

8 That she thought that I deserved to see 15:43:31
9 what had been done to me. She said that she had 15:43:35
10 reached out to my publicist, Leslie Sloane, to 15:43:40
11 share the same, and was not -- and was brushed 15:43:47
12 off. But she said that she felt like I should see 15:43:59
13 these messages and that they were on a phone that 15:44:04
14 she had ownership of because it was a company 15:44:08
15 phone. 15:44:14

16 Q Stephanie -- did you speak with Stephanie 15:44:14
17 Jones? 15:44:16

18 A No. This was relayed to me through 15:44:16
19 Ashley. 15:44:20

20 Q And did you get a hold of those documents? 15:44:20

21 ATTORNEY HUDSON: Objection. 15:44:24

22 A Eventually, yes. 15:44:25

23 Q When was that? 15:44:28

24 A Fall of 2024. 15:44:29

25 Q When you say "fall," can you be more 15:44:32

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Transcript of Blake Lively

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1 this way. 16:22:27

2 Q Did you cause or suggest to the cast of It 16:22:28

3 Ends With Us to stop following Justin Baldoni on 16:22:34

4 social media? 16:22:36

5 ATTORNEY HUDSON: Objection. 16:22:37

6 A No. 16:22:38

7 Q Did you have any discussions with anybody 16:22:38

8 in the cast about that? 16:22:41

9 A Yes, a couple of us spoke about it. 16:22:43

10 Q And who did you speak with? 16:22:47

11 A Jenny Slate was very upset on the first 16:22:50

12 round of production, so she unfollowed him in May 16:22:57

13 or June of 2023. And before the film came out -- 16:23:02

14 Jenny doesn't manage her social media. She has a 16:23:12

15 person do it for her. And she noticed that this 16:23:16

16 person had re-followed him. And she really wanted 16:23:22

17 these people out of her life, as she put it. I 16:23:29

18 don't know if those were the exact words. 16:23:32

19 And she was concerned about the tough 16:23:34

20 position we were all in, which is wanting to 16:23:46

21 protect the film and also wanting to respect her 16:23:51

22 own boundaries and dignity. 16:23:53

23 Q Who else did you have discussions with 16:23:57

24 about unfollowing Justin Baldoni? 16:24:00

25 A Colleen Hoover told me after she 16:24:02

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Transcript of Blake Lively

Conducted on July 31, 2025

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1 unfollowed him. 16:24:05

2 Q Anyone else? 16:24:07

3 A No. 16:24:10

4 Q Are you aware that Sony ever suggested 16:24:10

5 that you were the cause of people unfollowing 16:24:14

6 Justin? 16:24:17

7 ATTORNEY HUDSON: Objection. 16:24:17

8 A No. 16:24:18

9 Q Are you aware of Sony saying that it was 16:24:19

10 your doing that right before the premiere, 16:24:28

11 everybody stopped following Justin, which caused a 16:24:31

12 media interest in the dispute? 16:24:36

13 ATTORNEY HUDSON: Objection. 16:24:38

14 A Given that Sony is a corporate entity, can 16:24:39

15 you be more specific with who you're speaking 16:24:41

16 about? 16:24:42

17 Q Anyone at Sony. 16:24:44

18 A Anyone at Sony? 16:24:45

19 Q Yes. 16:24:46

20 A No, I'm not aware of that. 16:24:47

21 Q You've never seen a document or seen 16:24:48

22 anything that indicates in any way that Sony was 16:24:51

23 holding you responsible for the cast unfollowing 16:24:54

24 Justin; is that your testimony? 16:25:00

25 ATTORNEY HUDSON: Objection. 16:25:01

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Transcript of Blake Lively

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1 time. So I had no reason to ask unless there was 16:34:28
2 an outbreak, but nobody told me there was an 16:34:33
3 outbreak. 16:34:35

4 So I said, "Why didn't anyone tell me?" 16:34:36

5 And she said, "Well, because we don't have 16:34:40
6 COVID insurance, is my understanding, so I don't 16:34:42
7 think they wanted you to test." 16:34:45

8 Q And did you verify that information with 16:34:46
9 anyone? 16:34:51

10 A I was told the next day that they did not 16:34:53
11 have COVID insurance, yes. 16:34:56

12 Q Who told you that? 16:34:59

13 A Alex Saks. 16:35:01

14 Q Did you request a meeting with Jamey, 16:35:05
15 Justin and Alex Saks on June 1, 2023? 16:35:11

16 A I don't remember the date, but I do 16:35:17
17 remember when I came back after having COVID, I 16:35:19
18 requested a meeting with them. 16:35:23

19 Q How did you request the meeting? 16:35:25

20 Was it by email or a phone call? 16:35:28

21 A I don't recall. 16:35:33

22 Q Was this an in-person meeting? 16:35:33

23 A Yes. 16:35:36

24 Q And this was the first day that production 16:35:36
25 began again after you got back from COVID, right? 16:35:41

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Transcript of Blake Lively

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1 A Yes. 16:35:44

2 Q Was anyone else invited to attend that 16:35:44

3 meeting that didn't attend? 16:35:49

4 A Not that I recall. 16:35:52

5 Q What was discussed at the meeting on 16:35:54

6 June 1st? 16:35:58

7 A I wanted to check in with them about many 16:36:00

8 things. But upon starting the meeting, Justin 16:36:11

9 started to explain to me that Jamey showing -- I 16:36:28

10 hadn't mentioned this -- that Jamey showing the 16:36:33

11 nude video of his wife was okay, and that it 16:36:37

12 wasn't Jamey's fault. Justin said, "It's my 16:36:40

13 fault. I told him to show you because I thought 16:36:43

14 you wanted to see it. So it's not on Jamey it's 16:36:45

15 on me." 16:36:49

16 Which was so shocking to me because I had 16:36:52

17 a conversation with Ange a few days before saying 16:36:57

18 I wanted to file a formal HR complaint. She told 16:36:59

19 me I couldn't file a complaint through Sony, and 16:37:02

20 that I had to file it to the men who were making 16:37:08

21 me so uncomfortable. 16:37:10

22 And I asked her not to tell them so that I 16:37:15

23 could figure out how to deal with it properly with 16:37:17

24 my team. And then she told them. And I didn't 16:37:20

25 know what to do, and I didn't know how to handle 16:37:25

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1 it, because that's not the way that I planned to 16:37:27
2 log my concerns. 16:37:33

3 And it was especially upsetting because I 16:37:37
4 now was -- confirmed everything that I was afraid 16:37:41
5 of, which is that they didn't find it to be an 16:37:43
6 issue. They didn't say absofuckinglutely not, 16:37:46
7 this will never happen again. They said it's my 16:37:51
8 fault, it's not his. "I thought you wanted to see 16:37:53
9 it." 16:37:55

10 They didn't ensure me that I would have a 16:37:56
11 safe set. They didn't offer me HR people to call. 16:38:00
12 They didn't tell me who was responsible, ever. 16:38:03
13 Not then, not before. And I had to keep working 16:38:06
14 with these people, and I had to do sex scenes with 16:38:12
15 these people, and I had to do a rape scene with 16:38:15
16 this person, and I had no one to go to. 16:38:18

17 Q Did you have a body double that could have 16:38:20
18 done that scene? 16:38:22

19 A When we came back, I asked for a body 16:38:23
20 double, yes. 16:38:26

21 Q And did you ultimately have the body 16:38:27
22 double do that scene? 16:38:29

23 A No, because it was after the protections 16:38:31
24 were in place and the set was much better. 16:38:32

25 Q At the June 1st meeting, did you -- 16:38:35

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1 ATTORNEY HUDSON: Just before you go on, 16:38:44
2 are you okay? 16:38:45
3 THE WITNESS: Yeah. 16:38:46
4 ATTORNEY FREEDMAN: Do you want to take a 16:38:46
5 break? 16:38:47
6 THE WITNESS: No, it's fine. Let's go. 16:38:47
7 Q On the June 1st meeting, did you expressly 16:38:50
8 tell Mr. Baldoni and Mr. Heath that there were 16:38:54
9 serious HR problems on the set? 16:38:58
10 A I don't know what words I used because I 16:39:02
11 wasn't planning on addressing the HR issues with 16:39:05
12 them directly in my trailer with Alex Saks in that 16:39:09
13 moment. But I did express real concern for the 16:39:15
14 things that had occurred thus far, including Jamey 16:39:18
15 entering my trailer when I was naked from the 16:39:22
16 waist up. 16:39:27
17 Q So when Jamey showed you the video of the 16:39:27
18 birthing scene, the afterbirthing scene -- are you 16:39:35
19 familiar with that? 16:39:40
20 ATTORNEY HUDSON: Objection. 16:39:40
21 A That's not what I said, no. 16:39:42
22 Q Do you recall Jamey showing you a still 16:39:43
23 image on his iPhone? 16:39:48
24 ATTORNEY HUDSON: Objection. 16:39:50
25 A No, I recall a moving image. 16:39:51

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1 Q Did you watch the movie? 16:39:54

2 ATTORNEY HUDSON: Objection. 16:39:55

3 A Movie? I wouldn't characterize it as a 16:39:56

4 movie, no. 16:39:59

5 Q Well, did you just say "movie image"? 16:40:00

6 A "Moving image." 16:40:03

7 Q Oh, "moving image." I apologize. 16:40:05

8 Did you watch the moving image? 16:40:07

9 A As soon as I saw that it was a naked woman 16:40:10

10 fully exposed, I asked him to stop. 16:40:14

11 Q Was there a birthing scene during the 16:40:20

12 production of It Ends With Us? 16:40:27

13 A We had already shot the birthing scene 16:40:29

14 when he showed me that video. 16:40:32

15 Q And did he tell you why he was showing you 16:40:34

16 the video? 16:40:36

17 A No. 16:40:37

18 Q And he just showed it to you without 16:40:38

19 explaining anything about it? 16:40:42

20 A Yes. 16:40:43

21 Q And you just looked at it and -- how long 16:40:44

22 did you look at it for? 16:40:48

23 ATTORNEY HUDSON: Objection. 16:40:49

24 A Very briefly. 16:40:51

25 Q "Very briefly" meaning two minutes, a 16:40:52

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1 minute? 16:40:57

2 A I stopped it as soon as I saw that there 16:40:57

3 was a naked woman he was showing me. Because I 16:40:59

4 didn't know what it was. There was no context. 16:41:02

5 He did not ask if I wanted to see it. He did not 16:41:05

6 ask for my consent. I asked if -- he told me it 16:41:08

7 was his wife giving birth. I asked if she had 16:41:12

8 given consent to share that with me. 16:41:16

9 Q And what did she say? 16:41:18

10 A She wasn't there. 16:41:22

11 Q What did he say that she said? 16:41:24

12 A "She's not weird about that kind of 16:41:26

13 stuff." 16:41:28

14 Q Did he tell you why he was showing it to 16:41:29

15 you? 16:41:31

16 A No. 16:41:31

17 Q You had no idea whatsoever why he was 16:41:33

18 showing it to you? 16:41:36

19 ATTORNEY HUDSON: Objection. 16:41:37

20 A No. There was no reason to show me that 16:41:38

21 that day. We were shooting in a Boston bar. 16:41:45

22 Q During the June 1st meeting that we were 16:41:50

23 just talking about attended by yourself, Jamey, 16:41:57

24 Justin and Alex Saks, during that meeting, did you 16:42:01

25 call the actions by Justin Baldoni sexual 16:42:07

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1 I would do a Colleen Hoover film, because the 17:34:12
2 narrative or the sentiment was that this book 17:34:18
3 romanticized and sexualized, more specifically, 17:34:28
4 not romanticized, but sexualized domestic 17:34:30
5 violence. 17:34:33

6 Q And does negative press bother you? 17:34:34

7 ATTORNEY HUDSON: Objection. 17:34:38

8 A I'm used to it after this many years in 17:34:43
9 the industry, but it's not something I've had to 17:34:48
10 deal with often. 17:34:53

11 Q Well, I mean, it's true that you dealt 17:34:58
12 with negative press with respect to being married 17:35:01
13 on a plantation during, kind of, the height of 17:35:04
14 Black Lives Matter; is that right? 17:35:07

15 ATTORNEY HUDSON: Objection. 17:35:09

16 A It's true that I dealt with negative press 17:35:09
17 during that. I was not married then. And I feel 17:35:13
18 like that negative press was deserved. It's a 17:35:18
19 mistake we have publicly acknowledged and done a 17:35:22
20 lot of work to reconcile for ourselves and others. 17:35:32

21 Q And just to be clear, you're not alleging 17:35:36
22 that anything related to the plantation wedding is 17:35:40
23 part of the smear campaign; is that correct? 17:35:44

24 ATTORNEY HUDSON: Objection. 17:35:47

25 A No. 17:35:50

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1 Q No, it's not correct or yes, it's correct? 17:35:51
2 ATTORNEY HUDSON: Well, objection. 17:35:56
3 A Well, your question was unclear. Can you 17:35:58
4 say it again? 17:35:59
5 Q One more time, again, I apologize. 17:36:00
6 Is any of the press that came out 17:36:04
7 around -- that was negative around the fact that 17:36:07
8 you were married on a plantation, is it your 17:36:08
9 position that you believe that's part of the smear 17:36:11
10 campaign? 17:36:14
11 ATTORNEY HUDSON: Objection. 17:36:15
12 A I don't know all that was utilized to -- 17:36:16
13 all that was created, dredged up as a part of this 17:36:32
14 smear campaign. 17:36:40
15 I take full accountability for that 17:36:41
16 decision, as does my husband, but I don't know 17:36:44
17 what weaponizations of the past has been a part of 17:36:54
18 the campaign. 17:37:00
19 Q What do you mean by "dredged up"? 17:37:01
20 A I mean that both directly and indirectly, 17:37:04
21 by creating this environment, it -- there was a 17:37:14
22 story that was being told about me suddenly on 17:37:25
23 August 9th that I was a -- it was about my 17:37:30
24 character. I was a mean girl, that I was a bully. 17:37:34
25 Most specifically that I was a bully. And my 17:37:37

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1 ATTORNEY HUDSON: Objection. 17:54:27

2 A I did not ask that of anyone. Like I 17:54:28

3 said, as a part of the return-to-work protections, 17:54:32

4 my lawyers negotiated with both the Wayfarer 17:54:35

5 parties -- and as Wayfarer represented it, Sony as 17:54:38

6 well -- on what would happen to the footage that 17:54:44

7 was most sensitive in nature. 17:54:47

8 Q So you never asked or had anybody on your 17:54:54

9 behalf ask anyone from Sony to destroy the 17:54:59

10 dailies; is that correct? 17:55:03

11 ATTORNEY HUDSON: Objection. 17:55:04

12 A No, I never asked anyone to destroy 17:55:05

13 dailies, no. 17:55:08

14 Q What about did you ask anyone on your 17:55:10

15 behalf to contact Sony to destroy the dailies? 17:55:12

16 A To destroy the dailies? 17:55:15

17 ATTORNEY HUDSON: Objection. 17:55:18

18 A No. 17:55:19

19 Q Did you ever draft an HR complaint? 17:55:19

20 A I don't know what that means. 17:55:54

21 Q Human resources complaint, did you ever 17:55:56

22 fill one out? 17:55:58

23 ATTORNEY HUDSON: Objection. 17:55:59

24 A I was never provided an HR resource. 17:56:00

25 Q So is that no, you did not? 17:56:04

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1	ATTORNEY HUDSON: Objection.	17:56:07
2	A I went to my attorneys and asked for HR	17:56:08
3	protections because I was not provided an HR	17:56:11
4	resource, no.	17:56:16
5	Q So in August of 2023, you had not drafted	17:56:18
6	any type of HR complaint; is that correct?	17:56:38
7	ATTORNEY HUDSON: Objection.	17:56:41
8	A Like I said, I wasn't provided an HR	17:56:43
9	resource. I had made attempts to file HR claims.	17:56:48
10	Q You made attempts to file written HR	17:56:55
11	complaints claims or oral ones?	17:56:57
12	A Wayfarer parties never offered me or made	17:57:01
13	me aware of who to go to for HR.	17:57:08
14	That's standard on a set. I don't know	17:57:14
15	movies that happen anymore in which the actor	17:57:17
16	doesn't have to do an HR meeting along with the	17:57:22
17	rest of the crew. That's a requirement.	17:57:27
18	But this film did not provide it, as far	17:57:31
19	as I'm aware. And so I called Ange Giannetti and	17:57:34
20	told her that I would like to file one through	17:57:43
21	Sony and was told that I couldn't.	17:57:46
22	Q Did you ever refer to the Wayfarer	17:57:48
23	defendants as "clowns"?	17:57:51
24	A That sounds familiar.	17:57:54
25	Q Did you ever refer to them as "doofuses"?	17:57:56

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1 Q What film was that? 18:02:15

2 A I don't recall the name. 18:02:16

3 Q And that didn't happen as a result of you 18:02:18

4 being sexually harassed or did that not happen as 18:02:20

5 a result of the smear campaign? 18:02:23

6 ATTORNEY HUDSON: Objection. 18:02:24

7 A I don't believe those two are mutually 18:02:25

8 exclusive. I believe that I was sexually harassed 18:02:29

9 and retaliated against. And part of that 18:02:32

10 retaliation was a smear campaign. And that smear 18:02:34

11 campaign harmed my prospective work opportunities. 18:02:37

12 Q Have you worked since it ends with us? 18:02:43

13 A Have I worked? 18:02:45

14 Q Yes. 18:02:46

15 A Can you be more specific. 18:02:47

16 Q Have you had a job which pays you money? 18:02:48

17 ATTORNEY HUDSON: Objection. 18:02:51

18 A I work regularly. I don't get paid money 18:02:56

19 from my work. 18:03:01

20 Q What jobs have you had since it ends with 18:03:02

21 us? 18:03:05

22 ATTORNEY HUDSON: Objection. 18:03:06

23 A I have a company called Betty Buzz, and I 18:03:07

24 have a company called Blake Brown. 18:03:15

25 Q And you've done no other work since the 18:03:20

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1 end of it ends with us other than working on those 18:03:25
2 two companies? 18:03:28
3 ATTORNEY HUDSON: Objection. 18:03:28
4 Q Have you? 18:03:32
5 A No, I don't believe so. 18:03:32
6 Q Were you in a movie with Anna Kendrick? 18:03:33
7 A Are you asking about -- I understood your 18:03:40
8 question to be since it ends with us came out. 18:03:42
9 Are you asking since I shot it ends with 18:03:44
10 us? 18:03:46
11 Q That's correct, since you shot it ends 18:03:47
12 with us. 18:03:49
13 A Okay. 18:03:49
14 Q Since the beginning of the smear campaign. 18:03:49
15 ATTORNEY HUDSON: Objection. 18:03:52
16 A You're using your definition in different 18:03:52
17 ways. The way you have defined the smear campaign 18:03:57
18 for purposes of today is the digital manipulation 18:04:00
19 that occurred in August of 2024. That's when the 18:04:03
20 film was released. So that's what I understood us 18:04:07
21 to be talking about. 18:04:10
22 Are you asking -- are you asking about 18:04:11
23 from the time the film was completed being shot or 18:04:14
24 from when it was released? 18:04:18
25 Q Did you go to Toronto Film Festival on a 18:04:19

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1 movie that involved Anna Kendrick also? 18:04:24

2 A When? 18:04:28

3 Q Did you go to any -- it was actually 18:04:30

4 Austin. 18:04:33

5 Did you go to Austin on a film that 18:04:34

6 involved Anna Kendrick? 18:04:36

7 A Yes. I just don't want to misstate my 18:04:41

8 testimony. So when you say "since It Ends With 18:04:42

9 Us," I just want to be clear for the record that I 18:04:45

10 understood you to be saying since it ends with us 18:04:47

11 came out, because you're timestamping it from the 18:04:49

12 smear campaign. 18:04:51

13 So I have done a movie since it ends with 18:04:52

14 us finished shooting. I have not done a movie 18:04:55

15 since it ends with us came out and the retaliation 18:04:57

16 campaign started. 18:05:02

17 Q Have you received any offers of 18:05:03

18 employment? 18:05:07

19 ATTORNEY HUDSON: Objection. 18:05:08

20 A "Of employment"? I don't know what that 18:05:11

21 means. 18:05:12

22 Q Well, has anybody offered you a role in a 18:05:13

23 movie or asked you to take a look at a movie to be 18:05:16

24 an actress or a writer or a director or an actor 18:05:18

25 or any role? 18:05:26

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1	A Since --	18:05:28
2	ATTORNEY HUDSON: Objection.	18:05:29
3	A Since when?	18:05:29
4	Q Since it ends with us came out.	18:05:30
5	A Not that I'm aware of.	18:05:35
6	Q Who are your family members that have been	18:05:39
7	substantially harmed?	18:05:44
8	ATTORNEY HUDSON: Objection.	18:05:50
9	A My husband and children.	18:05:51
10	Q Anyone else?	18:05:54
11	A I believe that my mother and my siblings	18:05:57
12	have been emotionally harmed. And I believe my	18:06:06
13	sister and her husband have been harmed as well.	18:06:15
14	Q You've won some accolades since it ends	18:06:20
15	with us has come out; is that true?	18:06:27
16	ATTORNEY HUDSON: Objection.	18:06:29
17	A I don't know.	18:06:30
18	Q Were you selected in -- having something	18:06:31
19	to do with either Time 100 or People 100?	18:06:36
20	Did anybody honor you?	18:06:42
21	ATTORNEY HUDSON: Objection.	18:06:46
22	A I don't think that's characterized as	18:06:46
23	winning an accolade. But, yes, I was honored at	18:06:50
24	the Time 100 -- in the Time 100 list and at the	18:06:53
25	event.	18:06:56

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1 great your rooftop scene writing was? 18:27:13

2 ATTORNEY HUDSON: Objection. 18:27:15

3 A No, that's not how I would characterize 18:27:16

4 what happened. 18:27:18

5 Q How would you characterize what happened? 18:27:19

6 A I -- Taylor was coming to my apartment 18:27:22

7 anyway to hang out. Justin was still there. I 18:27:26

8 was very afraid of the state of the script, given 18:27:34

9 that he had been adding naughty doctor scenes and 18:27:38

10 then some, which we've discussed earlier. 18:27:46

11 And I was aware at this point that I could 18:27:53

12 not get out of the film. I was also aware that 18:27:55

13 Justin was not -- it didn't feel like he was 18:28:02

14 making forward progress. He had changed the 18:28:10

15 script significantly from the one I had signed on 18:28:14

16 to. I didn't know he was changing it 18:28:18

17 significantly. 18:28:22

18 He told me -- he sent me a script and I 18:28:23

19 said, "Can you send me a version with stars on 18:28:27

20 it," which is what happens when you change a line, 18:28:34

21 a star shows up in the margin. 18:28:36

22 And he said, "Oh, I'm 15 drafts in from 18:28:38

23 the original. If I sent you a version with stars 18:28:41

24 on it, the whole thing would be starred." 18:28:43

25 So the entire film that I had agreed to 18:28:46

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1 was changing significantly. I knew I couldn't get 18:28:49
2 out of the film. I was trying to do anything I 18:28:54
3 could to make it better -- because I requested 18:28:58
4 that we go back to the draft that I had agreed to 18:29:04
5 join the movie on, and he said we've already been 18:29:08
6 prepping this one, we can't go back. 18:29:11

7 I didn't know any of that was happening. 18:29:14

8 I tried -- I sent him pages. He was busy that 18:29:15
9 weekend. I think he had a friend in town. And I 18:29:21
10 didn't feel like he was taking it very seriously 18:29:25
11 that the script was of concern. 18:29:31

12 And other people in my life, mutual people 18:29:35
13 that he knows as well, were very concerned about 18:29:37
14 the state of the script. 18:29:41

15 And I sent Taylor the script on her way to 18:29:46
16 my apartment because Justin was still there, and I 18:29:49
17 asked her to read them. I told her she didn't 18:29:52
18 have to, I didn't want her to feel pressured to do 18:29:57
19 that, but I hoped that she would. And if she 18:30:00
20 liked them, if she could express enthusiasm, 18:30:03
21 because I was hoping that that would create some 18:30:07
22 excitement and that he might pay closer attention 18:30:12
23 to them. 18:30:20

24 Q Isn't it true you told her that whether or 18:30:22
25 not she readed them -- she read your pages, that 18:30:27

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1 When Mr. Freedman allegedly made these 19:21:17
2 defamatory comments on behalf of Mr. Wallace, did 19:21:20
3 he make them prior to the lawsuit -- to that 19:21:25
4 lawsuit, which has now been dismissed, being sent 19:21:29
5 to New York? 19:21:32

6 ATTORNEY HUDSON: Objection. 19:21:32

7 Q How about that? 19:21:33

8 ATTORNEY HUDSON: Objection. 19:21:36

9 A My understanding is that Mr. Freedman's 19:21:37
10 harmful statements started as soon as the first 19:21:45
11 case started, which would be mine. So December of 19:21:55
12 2024. 19:22:01

13 Q Okay. The premiere of it ends with us, 19:22:01
14 the film, was on August 6th of 2024; is that 19:22:16
15 right? 19:22:22

16 A I don't know the exact date, but that 19:22:22
17 sounds correct. 19:22:24

18 Q Okay. 19:22:25

19 ATTORNEY BABCOCK: Have you got 1051? 19:22:27

20 I may have a document that might help. 19:22:29

21 THE WITNESS: Thanks. 19:22:32

22 ATTORNEY BABCOCK: You can -- attach that 19:22:34
23 one. 19:22:38

24 (Exhibit 1051, marked for identification.) 19:22:38

25 BY ATTORNEY BABCOCK: 19:22:57

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1 Q 1051, if you go to the fourth page, next 19:22:57
2 to last page, it says, "Tuesday, August 6th, 19:23:06
3 7:00 P.M., it ends with us premiere, location AMC 19:23:12
4 Lincoln Square, 1998 Broadway, New York, 19:23:16
5 New York." 19:23:20

6 Does that refresh your recollection as to 19:23:20
7 when the premiere was? 19:23:23

8 A Sorry, I wasn't there yet. 19:23:24

9 This is 8981? Tuesday, August 6th, it 19:23:26
10 ends with us premiere. Yes. 19:23:33

11 Q Okay. And the -- the film's release was 19:23:35
12 on August 9th; is that right? 19:23:43

13 A In the United States, yes. It released at 19:23:45
14 different times in different international 19:23:51
15 territories. But for the sake of our 19:23:52
16 conversations today, when I've talked about the 19:23:55
17 day the film was released, I was talking about 19:23:59
18 August 9th. 19:24:01

19 Q Okay. And you testified earlier that that 19:24:02
20 was when you first became aware of the negative 19:24:03
21 argument or the -- sorry, the negative article 19:24:07
22 about you, right? 19:24:12

23 ATTORNEY HUDSON: Objection. 19:24:13

24 A Not an article, no. It felt -- no, not 19:24:13
25 one article. 19:24:22

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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, ANITA M. TROMBETTA, RMR, CRR, and Certified
3 California Shorthand Reporter, the officer before
4 whom the foregoing deposition was taken, do hereby
5 certify that the foregoing transcript is a true
6 and correct record of the testimony given; that
7 said testimony was taken by me stenographically
8 and thereafter reduced to typewriting under my
9 direction; that reading and signing was requested
10 [or not requested, as appropriate]; and that I am
11 neither counsel for, related to, nor employed by
12 any of the parties to this case and have no
13 interest, financial or otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand and affixed my notarial seal this 31st day of
16 July, 2025.

17 My commission expires: 10.07.2025

18
19
20
21



22 Anita M. Trombetta, RMR, CRR

23
24
25