

# Exhibit 189

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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,

Plaintiff,

vs.

CASE NO. 24-CV-10049-LJL (LEAD CASE)

25-CV-449 (LJL) (MEMBER CASE)

WAYFARER STUDIOS LLC, ET AL.

Defendants.

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JENNIFER ABEL,

Third-party Plaintiff,

vs.

JONESWORKS, LLC,

Third-party Defendant.

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WAYFARER STUDIOS LLC, et al.

Consolidated Plaintiffs,

vs.

BLAKE LIVELY, et al.

Consolidated Defendants.

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**\*\*CONFIDENTIAL\*\***

VIDEO-RECORDED DEPOSITION OF MELISSA NATHAN

Los Angeles, California

Monday, September 29, 2025

Stenographically Reported by: Ashley Soevyn,  
CALIFORNIA CSR No. 12019

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1 minutes.

2 MR. GOTTLIEB: All right. Why don't we  
3 take a quick break because I need to use the  
4 facilities.

5 THE WITNESS: Sure.

6 THE VIDEOGRAPHER: The time is 10:29 a.m.  
7 Off record.

8 (Recess.)

9 THE VIDEOGRAPHER: The time is 10:46 a.m.  
10 We're back on record.

11 BY MR. GOTTLIEB:

12 Q All right. Thank you, Ms. Nathan. Back  
13 on the record. What is your position at TAG?

14 A I'm the founder and CEO.

15 Q Founder and CEO. And so you oversee all  
16 your employees?

17 A I do.

18 Q Is there anyone you answer to at TAG?

19 A No.

20 Q How many employees did TAG have, let's  
21 focus, just for the time being, on July and August  
22 of 2024?

23 A Yes.

24 Q How many people worked for you at TAG  
25 during that period of time?

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1 is "our team's digital experts"?

2 A In this scenario? Because we have a few.

3 Q In this -- who are you referring to in  
4 this document sent to your client?

5 A Wayfarer hired Jed Wallace.

6 Q Okay. And is that who you had in mind  
7 when this was written to -- to the client?

8 A That would be fair, yes.

9 Q Okay. And if you recall previously, we  
10 were looking at the TAG website.

11 A Yes.

12 Q And there is a reference there to digital  
13 and social strategy?

14 A Yeah.

15 Q Is that -- when you're talking about  
16 digital and social strategy, is Mr. Wallace one of  
17 the people that you have in mind as the people  
18 providing those services for TAG?

19 A Yes.

20 Q Is there anybody else that TAG uses for  
21 digital or social strategy?

22 A There is.

23 Q Who is that?

24 A Skyline.

25 Q Okay. And who is in charge of Skyline?

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1 A Two people.

2 Q Who is that?

3 A Roza and her partner, and I forget his  
4 last name. But yeah, Roza.

5 Q What is Roza's full name?

6 A Kalantari.

7 Q Can you spell that, please?

8 A K-A-L -- K-A-L-A-N-T-A-R-I.

9 Q Okay. Did Ms. Kalantari provide any work  
10 in the -- on this -- on the Wayfarer account in  
11 connection with TAG?

12 A At what time?

13 Q At any time.

14 A After litigation, yes.

15 Q Okay. So in the July-August period of  
16 time, Ms. Kalantari did not perform any services for  
17 TAG?

18 A She did not.

19 Q In fact, at one point in time, did Ms.  
20 Kalantari tell you that she would not be available  
21 to work on this account in around July, August 2024?

22 A I can't remember that.

23 Q Okay. Did Skyline perform any work in  
24 connection with your work in July or August of 2024?

25 A Define my work.

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1           Q       How is that different from off the  
2       record? How is it different to -- is there a  
3       difference between talking on background as a source  
4       familiar and talking to a journalist off the record?

5           A       It's a gray line, but yes.

6           Q       Okay. So explain that to me.

7           A       Off the record is telling someone a piece  
8       of information that you would like it to be off the  
9       record. I think it's, you know, important to note  
10      that just because we tell a reporter something,  
11      doesn't mean they're going to write it. We can't --  
12      we do not have oversight on them writing an article.  
13      If they choose to use it, it's up to them.

14          Q       Sure.

15          A       Especially off the record.

16          Q       And by contrast, you don't know for sure  
17      when you tell a journalist something off the record,  
18      precisely what they'll do with that information,  
19      right?

20          A       Correct.

21          Q       You have a general understanding and  
22      agreement that they're not going to print it, right?

23          A       What do you mean?

24          Q       Like you tell a journalist something is  
25      off the record, and you give them some -- whatever

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1 the information is you give them --

2 A Uh-huh.

3 Q -- your general understanding -- and tell  
4 me if I'm wrong -- is they are not going to print  
5 that information in whatever article they're working  
6 on, right?

7 A That's not correct. You mean -- you mean  
8 interpretation? That's what you mean? They're not  
9 going to print it to you; that's what you mean?

10 Q I'm -- I only want to understand it from  
11 your perspective.

12 A No --

13 Q So tell --

14 A -- that's not true.

15 Q -- me how you understand it.

16 A Well, off the record, you're not  
17 telling -- you can give someone information off the  
18 record and it's their choice they're going to use  
19 it. Report -- you're not going to just phone up  
20 someone and say, "off the record," and then they  
21 don't use it. You hope they do, but you can't tell  
22 them they're going to use it.

23 Q You hope they don't use it?

24 A It depends on the situation.

25 Q I'm just trying --

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1           A     Me, too. But it depends on the  
2     situation.

3           Q     Yeah. Okay.

4           A     There's a million different situations  
5     and scenarios that you are --

6           Q     I just --

7           A     -- trying to whittle down to one.

8           Q     I just want to try to understand your  
9     view of this.

10          A     Uh-huh.

11          Q     So am I right -- I think I'm  
12     understanding what you're saying is, it's possible  
13     if you call up a reporter and give them something  
14     off the record --

15          A     Uh-huh.

16          Q     -- you hope they don't print it, but it's  
17     possible that they could?

18          A     Possible.

19          Q     And it's possible they could use that  
20     information to go call other sources and try to get  
21     that information on the record that you provided to  
22     them off the record, right?

23          A     Possible.

24          Q     Have you had that happen to you in your  
25     career?



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1           A     I couldn't pinpoint it.

2           Q     Do you think at some point in your  
3 career, you've given a reporter information off the  
4 record that they then were able to go do  
5 investigative work, do some digging, and find that  
6 information from a source they could attribute it  
7 to?

8           A     Perhaps.

9           Q     And so the information you provided was  
10 never published, but the actual information they got  
11 from somebody else?

12          A     Perhaps.

13          Q     Okay. So off the record information can  
14 still be very useful to a journalist and going  
15 around and doing other research and doing other  
16 digging and trying to find stuff that might already  
17 be in the public record?

18          A     I'm sure.

19          Q     Okay. You write in this section:

20               (As read) :

21               "TAG will confirm outlets intending on  
22 covering the story, especially those  
23 impactful to Justin, Jamey, and  
24 Wayfarer's interest, are fully briefed  
25 on the situation, including and not

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REPORTER'S CERTIFICATE

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

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

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

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

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

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

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 1st day of October, 2025.



ASHLEY SOEVYN

CSR No. 12019