

# Exhibit 191

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 - - - - - x  
4 STEPHANIE JONES AND :  
5 JONESWORKS LLC, :  
6 Plaintiffs, : Civ. Action No.  
7 v. : 1:25-cv-00779-LJL  
8 JENNIFER ABEL, MELISSA :  
9 NATHAN, JUSTIN BALDONI, :  
10 WAYFARER STUDIOS LLC, :  
11 AND JOHN DOES 1-10, :  
12 Defendants. :  
13 - - - - - x

14  
15 Videotaped Deposition of STEPHANIE JONES  
16 New York, New York

17 Tuesday, September 16, 2025  
18 9:16 A.M.

19 CONFIDENTIAL - ATTORNEYS' EYES ONLY

20  
21  
22 Job No.: 594347

23 Pages: 1 - 280

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

1 It was -- 10:17:17

2 Q And what happened -- and what happened in 10:17:18

3 2023 that was the reason that you halted referring 10:17:21

4 business to her? 10:17:26

5 A An associate of one of my clients had a 10:17:27

6 hotel room at the Setai, and a very young aspiring 10:17:44

7 singer was found dead in the bathtub. And it was 10:17:55

8 my understanding that she was handling crisis for 10:18:04

9 that associate of my client's. And that's when I 10:18:09

10 stopped recommending her. 10:18:23

11 Q Do you recall when in 2023 that you 10:18:24

12 stopped recommending her? 10:18:28

13 A I don't recall exactly when that happened 10:18:31

14 in 2023. I know that also the incident happened 10:18:41

15 before -- well before it was in the press. 10:18:45

16 Q You know that the incident happened before 10:18:52

17 it was in the press; is that correct? 10:18:55

18 A The press -- it's my understanding based 10:18:56

19 on conversations and also the press that it had 10:19:01

20 happened at a prior date but somehow hadn't gotten 10:19:08

21 out in the press, yes. 10:19:11

22 Q And what about that situation bothered you 10:19:13

23 so much that you stopped referring business to 10:19:17

24 her? 10:19:19

25 A She had made a phone call to someone on 10:19:19

1 Q What -- what did you tell your client? 10:21:17

2 A This is unethical. This isn't the way we 10:21:20

3 operate. 10:21:24

4 And I had read, you know, about it and it 10:21:28

5 was awful. And I was -- the girl was really 10:21:34

6 young, so I was upset that she was trying to 10:21:39

7 change her name. 10:21:42

8 And I said, as a mom, also, it was just 10:21:42

9 like, what are we doing. And it just -- yeah. 10:21:45

10 Q What about the services that she was 10:21:50

11 providing, what about those bothered you? 10:21:55

12 A I'm sorry, I don't -- I'm not following. 10:21:58

13 What do you mean? 10:22:01

14 Q Maybe I'm mischaracterizing it. So let me 10:22:02

15 step back and ask it a different way, is it fair 10:22:06

16 to say that you were upset that Melissa Nathan 10:22:11

17 took on that person as a client in that situation? 10:22:13

18 ATTORNEY TAHLER: Objection. 10:22:19

19 A No. I was upset that she was trying to do 10:22:19

20 something unethical. 10:22:27

21 Q And what was unethical? 10:22:28

22 A I guess the girl's name was different on 10:22:32

23 her birth certificate, but she was known by her 10:22:43

24 artist name, if you will, I guess. I don't really 10:22:45

25 know, but I know that she was trying to -- it 10:22:49

1 bothered me that she was trying to misrepresent 10:22:52  
2 who the girl was to create confusion. 10:22:56

3 Q And in terms of misrepresenting who the 10:22:58  
4 girl was, you're referring to the girl's name; is 10:23:02  
5 that correct? 10:23:05

6 ATTORNEY TAHLER: Objection. 10:23:07

7 A I don't remember the exact details of all 10:23:07  
8 the things that she wanted us to serve as a source 10:23:17  
9 for, meaning Jonesworks, but I do remember telling 10:23:21  
10 my client we should not be a second source at all, 10:23:27  
11 and this is because we're not privy to any of 10:23:32  
12 this. And I -- I knew Melissa hadn't called me to 10:23:34  
13 ask me because she knew I wouldn't have done that. 10:23:43

14 And there were several things that she was 10:23:51  
15 asking the team to serve as a source on, and we 10:23:54  
16 should not have been sources. But she was doing 10:23:58  
17 it under the guise of, like, protecting our client 10:24:01  
18 because of his association with him, the client 10:24:05  
19 she was representing. 10:24:07

20 Q And did your client not want that? 10:24:10

21 ATTORNEY TAHLER: Objection. 10:24:12

22 A If I recall, he was very upset. I was 10:24:13  
23 upset. I was emotional on the call with him. And 10:24:25  
24 he was very upset that she had called someone on 10:24:32  
25 my team as well and told me he was going to handle 10:24:39

1 it. 10:24:44

2 Q Is that why you were upset, because your 10:24:45

3 client was upset? 10:24:53

4 ATTORNEY TAHLER: Objection. 10:24:54

5 A No, I've already answered earlier that I 10:24:55

6 was upset at what she was asking us to do, because 10:24:58

7 it was unethical. 10:25:01

8 Q Right. 10:25:02

9 And when you say what she was asking you 10:25:03

10 to do was to serve as a source of some kind, 10:25:06

11 correct? 10:25:09

12 ATTORNEY TAHLER: Objection. 10:25:10

13 A Correct. 10:25:10

14 Q And what did she want your company to 10:25:10

15 serve as a source about? I know you testified to 10:25:14

16 the name, but was there something else that she 10:25:18

17 wanted you to act as a source on? 10:25:22

18 A Yeah, I had said earlier that I didn't 10:25:24

19 remember exactly what all those details were, but 10:25:27

20 that there were several things in addition to 10:25:29

21 saying her name wasn't this, it was that, was one 10:25:35

22 that sticks out to me that I recall. 10:25:38

23 Q Did you ever do any research on what this 10:25:42

24 young woman's real name was? 10:25:44

25 A Yes. 10:25:46

1 A I met her when she was working at CAA. 11:40:50  
2 And then she went to work at Westbrook, 11:40:53  
3 Will Smith's company. 11:40:56  
4 Q And what was her role at Westbrook, if you 11:40:57  
5 know? 11:41:02  
6 A I believe that she was -- I think she 11:41:02  
7 might have been president there also. 11:41:06  
8 Q Do you know whether or not Tera Hanks was 11:41:15  
9 involved in making the decision to bring on 11:41:17  
10 Melissa Nathan as a crisis person? 11:41:22  
11 A I can't remember the exact verbatim of her 11:41:27  
12 text to me, but it was just to me. And I believed 11:41:32  
13 that she said "we," so I assume that she was. 11:41:36  
14 Q Did you ever tell her, whether it in 11:41:51  
15 writing or orally, that she was making a mistake 11:41:57  
16 by bringing in Melissa Nathan? 11:42:00  
17 A I believe that I texted her and put it in 11:42:04  
18 writing, and then I believe we had a call as well, 11:42:14  
19 where I shared -- knowing that she was a mom of 11:42:17  
20 five girls, I shared with her what I had witnessed 11:42:21  
21 Melissa doing that I felt was really unethical 11:42:37  
22 with a friend, an associate of my client's. 11:42:40  
23 And I said this is someone who is trying 11:42:47  
24 to -- said something to the effect of this is 11:42:50  
25 someone who is trying to, like -- I just -- I said 11:42:59

1 this is something to the effect of: You're a mom 11:43:11  
2 of five girls. This is a woman who was literally 11:43:15  
3 trying to pretend like this young dead artist in a 11:43:18  
4 hotel room didn't exist. And -- and it's not 11:43:23  
5 someone we want to work with. It's really bad. 11:43:30

6 And I hoped that appealing to her being a 11:43:41  
7 mom of five girls, which we talked a lot about in 11:43:44  
8 the time I knew her, that she would understand how 11:43:50  
9 deeply unethical Melissa was, and that surely that 11:43:52  
10 would make her realize this isn't someone we want 11:43:58  
11 to align Justin with. 11:44:01

12 And I also texted Justin. I am someone 11:44:08  
13 who speaks up. I don't care if my client is rich. 11:44:11  
14 I don't care if they're famous. They're often 11:44:16  
15 surrounded by "yes" people. 11:44:19

16 And I -- I texted Justin. I think that I 11:44:22  
17 tried to call him as well and he didn't answer. 11:44:26  
18 And he texted me back that he was letting Jamey 11:44:31  
19 make the decision because it was too heavy for him 11:44:38  
20 to hold. 11:44:41

21 Q Other than the situation with your 11:44:43  
22 client's associate -- do you mind if I refer to 11:44:54  
23 that situation as the Miami situation? 11:44:59

24 A The dead girl in a jacuzzi, face down, who 11:45:02  
25 was in her 20s, sure. 11:45:05

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Transcript of Stephanie Jones

Conducted on September 16, 2025

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1 JONESWORKS\_39988 through 39991. 15:43:18

2 THE WITNESS: Stephanie Jones 5. 15:42:43

3 (Stephanie Jones Exhibit 5, marked for 15:42:43

4 identification.) 15:42:43

5 BY ATTORNEY FREEDMAN: 15:42:43

6 Q It's a text message between yourself and 15:43:14

7 Scooter Braun -- a text message string between 15:43:41

8 yourself and Scooter Braun, dated August 15th. 15:43:48

9 Do you need a minute to look at it? 15:44:03

10 A Yeah, let me just refresh my memory on 15:44:04

11 this. 15:44:06

12 (Document review.) 15:44:12

13 (Reporter clarification.) 15:44:21

14 THE WITNESS: I'm just reading out loud, 15:44:22

15 sorry. 15:44:24

16 (Reviewing document sotto voce.) 15:44:57

17 A Okay. 15:44:57

18 Q On August 15th, 2024, did you communicate 15:44:57

19 to Scooter Braun that Melissa Nathan was planting 15:45:00

20 stories so that she could kill them? 15:45:03

21 A I believe this was after -- yes, it was 15:45:19

22 after I returned from my trip. And, yes, I do 15:45:30

23 remember -- I believe that. 15:45:35

24 Q What stories were you referring to? 15:45:38

25 A On -- I believe it was August 9th, Jen, on 15:45:44

1 a text with my client, Wayfarer, said that Leslie 15:45:57  
2 Sloane or Blake's publicist. I can't recall the 15:46:04  
3 exact message, but that Sony, as well as Leslie 15:46:07  
4 Sloane, Blake Lively's publicist, had heard that I 15:46:12  
5 had leaked something to the Daily Mail and it had 15:46:19  
6 broken up the truce or something to that effect. 15:46:23  
7 And then I don't know if Jamey's text came 15:46:27  
8 before that or after that, but Jamey Heath texted 15:46:31  
9 me something of, like, my name in quotes. 15:46:34  
10 Stephanie Jones, we just heard that Stephanie 15:46:36  
11 Jones -- again something similar to leaking 15:46:39  
12 something to the Daily Mail. 15:46:43  
13 Q Were you trying to get Scooter Braun to 15:46:51  
14 fire Melissa Nathan? 15:46:55  
15 ATTORNEY TAHLER: Objection. 15:46:56  
16 A Are we still on the same -- oh, by sending 15:46:57  
17 that text? 15:47:03  
18 Q Saying -- telling Scooter that Melissa 15:47:03  
19 Nathan was planting stories so that she could kill 15:47:06  
20 them, was the purpose of sending that to Scooter 15:47:10  
21 Braun to try to get him to fire her? 15:47:12  
22 A I was telling Scooter what I believed to 15:47:16  
23 be true because it is something that I speculated 15:47:21  
24 in the past as well. And I believed that given 15:47:25  
25 she is constantly talking to Daily Mail -- and I 15:47:29

1 don't know if she used to work there, if her 15:47:35  
2 sister used to work there, but she had a deep 15:47:38  
3 connection with Daily Mail, and that would be one 15:47:40  
4 of her go-to places she would always go to. And 15:47:42  
5 the fact that they were blaming me for it because 15:47:46  
6 -- when I knew I hadn't, and I was on family 15:47:48  
7 vacation, I thought she was, A, behind my Business 15:47:51  
8 Insider piece. I felt strongly that she was, 15:47:57  
9 which we've since found out was right. 15:48:01

10 And I -- I knew that she was the one who 15:48:03  
11 had gone to Daily Mail or Jen, but I felt firmly 15:48:05  
12 that it was Melissa because the inquiry we got was 15:48:10  
13 about three influencers or a number of influencers 15:48:17  
14 who were on the carpet or who noticed that Blake 15:48:22  
15 and Justin didn't pose together on the carpet. 15:48:26

16 And it just so happened to be, which I 15:48:33  
17 think I noted, that Henry on our social team had 15:48:35  
18 sent those. Out of all the ones that were out 15:48:40  
19 there, he had curated a few, and those were the 15:48:43  
20 ones that were in the story. 15:48:46

21 And it was my belief that Henry had 15:48:47  
22 forwarded them to Jen and Jen had shared them and 15:48:49  
23 -- in order to get a big retainer from Justin and 15:48:53  
24 justify that she needed to come on board, my 15:48:56  
25 assumption was that she took those social media 15:48:59

1 posts to the Daily Mail and had them do a story so 15:49:05  
2 she could say, look, you urgently need to hire me 15:49:11  
3 now, it's -- you know, there is this Daily Mail. 15:49:14  
4         And I think they also knew that Justin 15:49:18  
5 wasn't following closely, nor was Jamey, nor was 15:49:20  
6 Tera, which articles were saying what and they 15:49:23  
7 tried to portray that this article was negative 15:49:27  
8 about Blake and broken the truce and I had done 15:49:30  
9 it. And it wasn't true, it was false. That was a 15:49:33  
10 lie. 15:49:35

11         And I couldn't think of any other 15:49:37  
12 explanation as to why they would want to lie and 15:49:39  
13 blame me for something like that, unless they were 15:49:42  
14 behind it. And I also knew that she wanted to get 15:49:44  
15 hired by Justin. And there were, you know, lots 15:49:47  
16 of texts, chats about this that we later 15:49:51  
17 discovered. 15:49:55

18         Q In this text string, you are commenting on 15:50:01  
19 the Business Insider piece and you say 53 -- you 15:50:03  
20 had 53 people text you how bad ass you are. 15:50:07

21         Do you see that? 15:50:12

22         A Yes. 15:50:13

23         Q Is that true? 15:50:14

24         A I don't recall. I just -- I had gotten a 15:50:16  
25 lot of incoming texts and people were trying to 15:50:19

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Transcript of Stephanie Jones

Conducted on September 16, 2025

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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 17th day of  
16 September, 2025.

17 My commission expires: 10.07.2025

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22 Anita M. Trombetta, RMR, CRR

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