

Exhibit 203

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,)	
PLAINTIFF,)	CASE NO.
VS.)	1:24-CV-10049-LJL
)	(CONSOLIDATED WITH
WAYFARER STUDIOS LLC,)	
JUSTIN BALDONI, JAMEY)	
HEATH, STEVE SAROWITZ,)	
IT ENDS WITH US MOVIE)	
LLC, MELISSA NATHAN,)	
THE AGENCY GROUP PR)	
LLC, JENNIFER ABEL, JED)	
WALLACE, AND STREET)	
RELATIONS INC.,)	
DEFENDANTS.)	

JENNIFER ABEL,)
THIRD-PARTY)
PLAINTIFF,)
VS.)
JONESWORKS LLC,)
THIRD-PARTY)
DEFENDANT.)

WAYFARER STUDIOS LLC,)
JUSTIN BALDONI, JAMEY)
HEATH, IT ENDS WITH US)
MOVIE LLC, MELISSA)
NATHAN, JENNIFER ABEL,)
AND STEVE SAROWITZ,)
CONSOLIDATED)
PLAINTIFFS,)

VS .
BLAKE LIVELY, RYAN)
REYNOLDS, LESLIE)
SLOANE, VISION PR,)
INC., AND THE NEW YORK)
TIMES COMPANY,)
CONSOLIDATED)
DEFENDANTS .)

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1 ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE

2 OCTOBER 9, 2025

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4 ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE,
5 produced as a witness at the instance of the Blake
6 Lively and duly sworn, was taken in the above styled and
7 numbered cause on Thursday, October 9, 2025, from 9:14
8 a.m. to 7:36 p.m., before Janalyn Elkins, CSR, in and
9 for the State of Texas, reported by computerized
10 stenotype machine, at the offices of Jackson Walker, 100
11 Congress Avenue, Suite 1100, Austin, Texas, pursuant to
12 the Federal Rules of Civil Procedure and any provisions
13 stated on the record herein.

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1 about services on email?

2 A. Not that I recall.

3 Q. How about on text message?

4 A. Not -- could you be more specific?

5 Q. On any form of electronic communication? Let's
6 broaden it up.

7 A. And the question did I have any communication
8 with her about any types of services?

9 Q. That you might provide to Wayfarer Studios?

10 A. Yeah, we discussed monitoring.

11 Q. Okay. In what -- on what platform did you have
12 that conversation with Ms. Nathan?

13 A. I -- I -- I wouldn't know because I didn't know
14 the client or the details yet.

15 Q. Were you in -- I'm not talk -- sorry. Maybe my
16 question was unclear. I wasn't talking about what
17 platform for monitoring. I was talking about the
18 platform that you used to communicate with Ms. Nathan
19 about that. Was it Signal?

20 A. We've communicated through Signal and phone
21 calls.

22 Q. By August 8th, 2024, had you communicated with
23 Melissa -- Melissa Nathan on Signal?

24 A. Related to this?

25 Q. On anything?

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1 A. Oh, yes.

2 Q. Okay. Did you also communicate with Ms. Nathan
3 on the -- do you -- do you have an Apple iPhone?

4 A. I do.

5 Q. Okay. Did you also communicate with Ms. Nathan
6 as of August 8th, 2024 on the Apple messaging app, the
7 iMessaging app?

8 A. Ever before?

9 Q. Yes.

10 A. I believe so.

11 Q. Would you say as between those two messaging
12 applications as of August 8th, 2024, with respect to
13 your communications with Melissa Nathan, you used one of
14 those applications more than the other?

15 A. I -- I would say yes, Signal.

16 Q. You used Signal more?

17 A. Uh-huh.

18 Q. When do you recall -- do you -- do you recall a
19 point in time when you started to use Signal more than
20 regular text messaging with Melissa Nathan?

21 A. No.

22 Q. Okay. At some point in time you did, though?

23 A. No, I need a more specific question.

24 Q. Okay. Do you see, back to the email,
25 Ms. Nathan says, (Reading:) He is aware we're going for

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1 Q. Well, you say in the email, (Reading:) This
2 was forwarded without attachments.

3 Right?

4 A. I do say that, but I don't recall.

5 Q. And -- okay. And you say, (Reading:) This is
6 exactly the kind of content (in theory, until I read
7 them) that our team can elevate.

8 | Right?

9 A. I do say that.

10 Q. So you seem to be saying, and correct me if I'm
11 wrong, but you seem to be saying that whatever this
12 attachment or article was, you hadn't read it yet?

13 A. I -- I can't speak to that. I'm not sure.

14 Q. You don't remember if that's what you're saying
15 here?

16 A. I don't remember, no.

17 Q. Well, nonetheless, whether you had read the
18 article or not, you say, (Reading:) This is exactly the
19 kind of content that our team can elevate across all
20 algorithmically driven platforms.

21 | **Correct?**

22 A. Yes.

23 Q. Was your team capable of elevating content
24 across algorithmically driven platforms?

25 A. I don't have a team.

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1 Q. Is Street Relations capable of elevating
2 content across all algorithmically driven platforms?

3 A. Absolutely not.

4 Q. So you were being untruthful to [REDACTED]
5 when you said that "our team can elevate across all
6 algorithmically driven platforms"?

7 MR. COOLEY: Objection.

8 THE WITNESS: Yeah, not at all.

9 Q. (BY MR. GOTTLIEB) You were not at all being
10 untruthful?

11 A. No.

12 Q. Okay. So Street Relations can't do that,
13 right?

14 A. Correct.

15 Q. Okay. So who was your team capable of
16 elevating across all algorithmically driven platforms?

17 A. If I'm referencing TAG, it would be whomever
18 works for TAG to post stories.

19 Q. And you're saying you have no memory at all of
20 what team you were referencing here?

21 A. No, I -- I think I said I'm referencing TAG as
22 the team.

23 Q. Okay. So you think that TAG is capable of
24 elevating content across all algorithmically driven
25 platforms?

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1 A. 100 percent.

2 Q. Okay. Who at TAG can do that?

3 MR. COOLEY: Objection.

4 THE WITNESS: To be specific, when you post
5 a story or find a place for a story, you are elevating
6 it across algorithmically driven platforms.

7 Q. (BY MR. GOTTLIEB) And so who at TAG was
8 capable of posting or sharing stories creating content?

9 MR. COOLEY: Same.

10 THE WITNESS: I don't know specifically.
11 That's their job, to create stories.

12 Q. (BY MR. GOTTLIEB) TAG's job is to create
13 stories?

14 A. Yes. Or -- let me be specific with that. Is
15 to help their clients get things posted as news stories,
16 which would 100 percent elevate it across all
17 algorithmically driven platforms.

18 Q. Okay. And -- and so you believe that when you
19 were writing, (Reading:) So I can share with the teams
20 and get it into the system, what you're talking about is
21 sharing the content with TAG?

22 A. I do.

23 Q. And you believe the system is a reference to
24 something that TAG has?

25 A. It's the system of posting or at least getting

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1 content covered for their clients.

2 Q. Okay. And you recall the previous exhibit we
3 looked at was on the 19th?

4 A. Uh-huh.

5 Q. At 7:29 p.m., and you said, (Reading:) Got
6 that one in the system/on it?

7 A. Correct.

8 Q. So does it look like you followed through on
9 what you said you would do here in Exhibit 10?

10 A. I don't recall what that is.

11 Q. Was this further help for [REDACTED]?

12 A. No. I didn't -- again, not engaged by [REDACTED]

13 [REDACTED]

14 Q. Well, sir, that was not my question. My
15 question was, was this further help for [REDACTED] that
16 you provided?

17 MR. COOLEY: Objection.

18 THE WITNESS: I can't answer that. I don't
19 know.

20 Q. (BY MR. GOTTLIEB) Why? Why can't you answer
21 that?

22 MR. COOLEY: Objection.

23 MR. BABCOCK: Same -- same objection.

24 THE WITNESS: I don't know if it helped
25 him.

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1 Q. (BY MR. GOTTLIEB) Did you believe you were
2 providing him with help?

3 A. No.

4 Q. It's a very simple question -- no?

5 A. I believe that I was helping to share
6 information.

7 Q. Is that not providing help?

8 A. It is.

9 Q. Okay. So if I want to ask you about whether
10 you were formally engaged by someone from this point
11 forward, I will be sure to ask formally engaged and
12 specify my question. But can we agree if I ask you if
13 you have helped someone, we're using the broad
14 definition of help in any respect?

15 MR. BABCOCK: Objection.

16 MR. COOLEY: Join.

17 MR. BABCOCK: You don't need to make an
18 agreement about that.

19 Q. (BY MR. GOTTLIEB) This is 11.

20 (Exhibit No. 11 was marked.)

21 Q. (BY MR. GOTTLIEB) Exhibit 11, sir, is a
22 document bearing the Bates Nos. 3.0486 through .0488.
23 This is a text chain. The date range is November 11th
24 through November 14th, 2024. Appears to be between
25 yourself, Ms. Nathan, Ms. Koslow, [REDACTED], and

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1 VIDEOGRAPHER: Going off the record. The
2 time is 12:29.

3 (Brief recess.)

4 VIDEOGRAPHER: Back on the record. The
5 time is 1:34.

6 Q. (BY MR. GOTTLIEB) Hi, Mr. Wallace, back on the
7 record. Hope you had a good lunch.

8 We were talking before about a period of
9 time in October through November of 2024. We were
10 looking at a bunch of messages. I think I asked you
11 before about sort of, like, the recordkeeping that you
12 have or that Street has for your work. If we wanted to
13 recreate one of your days in that period of time after
14 the fact, say, you know, mid-October, end of
15 October 2024, would you have anything in terms of
16 records other than, you know, your text messages,
17 emails, and phone records?

18 A. Would I have anything other as records? Is
19 that what you're asking? I'm sorry.

20 Q. Any information that you would have stored
21 somewhere that would help us to recreate one of your
22 days going back in time other than your -- what -- what
23 is -- you have preserved in the form of text messages,
24 whether Signal or Apple, emails, and phone records that
25 show outgoing and incoming calls?

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1 A. No.

2 Q. Do you keep --

3 A. Not that I'm aware of.

4 Q. I'm sorry.

5 A. Not that I'm aware of.

6 Q. Okay. Do you keep a calendar?

7 A. Yeah. There's -- there's a calendar of events.

8 Q. You -- you have a calendar personally?

9 A. Yeah. I mean, everyone has I on an iPhone.

10 Q. Okay. Do you ever put work calls or work
11 meetings into your calendar on your iPhone?

12 A. Yes.

13 Q. Okay. And if you get invited to a Zoom or a
14 Microsoft Teams meeting or something like that, that
15 from time to time show up in your calendar on your
16 iPhone?

17 MR. BABCOCK: Objection.

18 THE WITNESS: Yeah. If -- if someone sent
19 me a link to that, you know, it just populates
20 sometimes. You accept or deny.

21 Q. (BY MR. GOTTLIEB) All right. So sometimes you
22 will have a -- depending on whether somebody sent you
23 the invite to your -- your email or your -- otherwise
24 sent you an invite that populates into your calendar?

25 A. I need to know more details.

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1 a conversation in advance of her sending this message at
2 8:57 a.m.?

3 MR. BABCOCK: Objection.

4 MR. COOLEY: Join.

5 THE WITNESS: I don't recall.

6 Q. (BY MR. GOTTLIEB) Is it possible that before
7 Ms. Nathan sent this statement of work at 8:57 a.m. that
8 you and she discussed this statement of work?

9 MR. BABCOCK: Objection.

10 THE WITNESS: Yeah, I don't recall.

11 Q. (BY MR. GOTTLIEB) My question is just is it
12 possible?

13 MR. BABCOCK: Objection. Sorry.

14 Q. (BY MR. GOTTLIEB) So -- that's a -- that's a
15 yes or no --

16 MR. COOLEY: Join.

17 Q. (BY MR. GOTTLIEB) -- question?

18 A. Yeah, I don't think so.

19 Q. You don't think so. But do you know for
20 certain that you and Melissa Nathan did not discuss the
21 statement of work before she sent it at 8:57 a.m.?

22 MR. BABCOCK: Objection.

23 MR. COOLEY: Join.

24 THE WITNESS: We did not discuss the
25 statement of work before she sent that.

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1 Q. (BY MR. GOTTLIEB) You're certain of that as
2 you sit here today?

3 A. As I recall.

4 Q. Okay. That's a different answer. So saying to
5 the best of my recollection I don't recall discussing
6 this is one answer. Saying that you're certain is
7 another. So I'm just trying to discern the difference
8 to understand your testimony?

9 A. We didn't have a discussion about the scope of
10 work.

11 Q. Okay. And you're sure about that?

12 A. I'm sure about that.

13 Q. All right. Did you discuss it with her after
14 she sent it?

15 A. I don't recall.

16 Q. Okay. So you might have discussed it with her
17 after, but you're sure you didn't discuss it with her
18 before?

19 A. Yeah, I don't recall.

20 Q. Do you see the next bullet down says,
21 (Reading:) Use our team of specialists to build all the
22 digital (Reddit, site, X, 4 Chan, discord, et cetera)
23 messaging to trend and dominate in client's favor?

24 A. I do.

25 Q. Are you aware of any team of specialists that

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1 exists that can do that?

2 A. I'm not.

3 Q. Is Melissa Nathan a technically sophisticated
4 person?

5 MR. COOLEY: Objection.

6 MR. BABCOCK: Objection.

7 THE WITNESS: Yeah, I'd -- I'd need a more
8 specific question.

9 Q. (BY MR. GOTTLIEB) Do you think Melissa Nathan
10 understands, for example, the -- the concept of
11 something being algorithmically weaponized?

12 MR. BABCOCK: Objection.

13 MR. COOLEY: Join.

14 THE WITNESS: I don't know.

15 Q. (BY MR. GOTTLIEB) Do you think she understands
16 how to influence content on 4chan?

17 MR. BABCOCK: Objection.

18 MR. COOLEY: Objection.

19 THE WITNESS: I don't know.

20 Q. (BY MR. GOTTLIEB) Would it surprise you to
21 learn in her testimony under oath in this case she
22 testified that she doesn't even have social media?

23 MR. BABCOCK: Objection.

24 THE WITNESS: I -- I -- I don't -- I
25 don't -- have no idea if that would surprise me or not.

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1 It would be news.

2 Q. (BY MR. GOTTLIEB) Okay. But your testimony is
3 you don't know anyone who could build all of the digital
4 messaging from these platforms to trend and dominate in
5 the client's favor; is that right?

6 MR. COOLEY: Objection.

7 THE WITNESS: Correct.

8 Q. (BY MR. GOTTLIEB) And you can't do that
9 personally?

10 A. I cannot.

11 Q. Okay. So assuming that Melissa Nathan is also
12 not capable of doing this personally, given your
13 testimony that you can't do it personally and you don't
14 know anybody who can do this personally, is this a
15 truthful representation of the statement of work that
16 you, TAG, and Bryan Freedman could provide?

17 MR. BABCOCK: Objection.

18 MR. COOLEY: Objection.

19 THE WITNESS: I -- I have no idea what some
20 of these things are.

21 Q. (BY MR. GOTTLIEB) So -- so no, this would not
22 be a truthful and accurate representation of a service
23 that collectively, you, Melissa Nathan, and Bryan
24 Freedman could provide?

25 MR. BABCOCK: Objection.

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1 MR. COOLEY: Objection.

2 THE WITNESS: Not from my perspective.

3 Q. (BY MR. GOTTLIEB) Why do you think Melissa
4 Nathan repeatedly sends out statements of work that
5 represent digital services that you can't provide?

6 MR. BABCOCK: Objection.

7 MR. COOLEY: Objection.

8 THE WITNESS: Can you repeat that question?

9 Q. (BY MR. GOTTLIEB) Why do you think Melissa
10 Nathan repeatedly sends out statements of work to
11 clients referencing digital services that you are not
12 capable of providing?

13 MR. BABCOCK: Objection.

14 MR. COOLEY: Same.

15 THE WITNESS: I have no idea.

16 Q. (BY MR. GOTTLIEB) Does it concern you?

17 MR. BABCOCK: Objection.

18 THE WITNESS: I -- I don't know enough
19 about it --

20 Q. (BY MR. GOTTLIEB) As you sit here today --

21 A. -- that it concerns me.

22 Q. Sorry. I didn't mean to interrupt.

23 As you sit here today, we've now looked at
24 a few of these, right?

25 A. Uh-huh.

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1 Q. Okay. And I'm just asking you as a businessman
2 who runs his own business, who has a representation,
3 does it bother you at all that you are being held out to
4 provide services that you are sitting here telling me
5 under oath not only can you not provide them you don't
6 even know what they are?

7 MR. BABCOCK: Objection.

8 MR. COOLEY: Objection.

9 Q. (BY MR. GOTTLIEB) Does that bother you?

10 MR. BABCOCK: Same objection.

11 MR. COOLEY: Objection.

12 THE WITNESS: I don't know that she's
13 talking about me.

14 Q. (BY MR. GOTTLIEB) Okay. If she's talking
15 about you, if her testimony is in providing description
16 of digital services she was talking about you and Street
17 Relations, then would it bother you?

18 MR. BABCOCK: Objection.

19 MR. COOLEY: Objection.

20 THE WITNESS: I don't have enough details
21 there.

22 Q. (BY MR. GOTTLIEB) Would you want to keep
23 working with somebody who's making misrepresentations to
24 clients about what you can do?

25 MR. COOLEY: Objection.

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1 (Exhibit No. 18 was marked.)

2 Q. (BY MR. GOTTLIEB) This is Exhibit 18. And
3 Mr. Wallace, you've been handed a document marked as
4 Exhibit 18 bearing the Bates Nos. Street 3.0348 through
5 0355. And let me know once you've had a chance to look
6 through it.

7 A. Okay.

8 Q. You've had a chance to look through Exhibit 18?

9 A. I have.

10 Q. And Exhibit 18 is an email exchange be an
11 attachment that involves you, a number of people from
12 TAG, and someone from [REDACTED]; is that right?

13 A. Yes.

14 Q. Is [REDACTED] a client that you did any work
15 for around this time?

16 A. They were a client of TAG's.

17 Q. Okay. A client of TAG's. Did you or Street do
18 any work for them in connection with TAG's services?

19 A. I had a few consulting calls with them.

20 Q. Okay. And this August -- this is August 3rd,
21 2024. Is that around the same time that you began
22 working for -- performing the work that you did on
23 behalf of Wayfarer Studios?

24 A. No. It was later for Wayfarer.

25 Q. A few days later?

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1 A. August 9th.

2 Q. This was around the same time that you began
3 talking to Ms. Nathan about Mr. Baldoni and Wayfarer; is
4 that right?

5 A. I don't recall.

6 Q. Okay. At most, then, I think what you're
7 saying it was six days apart from when you were engaged?

8 A. According to this date, yes.

9 Q. Okay. And there is a scope of work for
10 [REDACTED] that is attached to the end of this email
11 chain; is that right?

12 A. Yes.

13 Q. And [REDACTED]
[REDACTED] -- oh,
15 lost your microphone.

16 A. My bad.

17 Q. No worries.

18 Am I right that [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

22 A. Yes.

23 Q. Okay. And at 8:28 p.m. on Friday, August 2nd,
24 you reply to the introduction that [REDACTED] has sent;
25 is that right?

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1 A. Yes.

2 Q. [REDACTED]

[REDACTED]
[REDACTED] I'm sorry for
5 the circumstances but happy to connect and help build a
6 solution.

7 Do you see that?

8 A. I do.

9 Q. And you say, (Reading:) I see the date of the
10 article and have my forensic team building a quick
11 report on the sentiment and how it engages so we can
12 discuss all the paths to solve.

13 Do you see that?

14 A. I do see.

15 Q. Who is your forensic team you were referring to
16 here?

17 A. I don't have one.

18 Q. Who were you referring to when you wrote "my
19 forensic team"?

20 A. I don't recall.

21 Q. Do you think you had someone out there that was
22 building a quick report on the sentiment?

23 A. No, not at this point.

24 Q. Do you think you asked anyone whether human,
25 AI, or otherwise to build a sentiment report at this

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1 point in time?

2 A. I did not.

3 Q. So this was a misrepresentation that you made
4 to [REDACTED]

5 A. It was forward thinking before I looked into
6 the case.

7 Q. I'm not sure I understand what you're saying?

8 A. I hadn't had a chance to review. I was going
9 to review myself first.

10 Q. Okay. So you didn't yet have anyone building a
11 quick report. But what you're telling me, I think, is
12 that your intention was to prepare some kind of a
13 sentiment report?

14 A. I don't know enough details. I don't recall.

15 Q. Okay. But you certainly recall that it was not
16 correct that you had a forensic team at that time
17 building a quick report on the sentiment?

18 A. Correct.

19 Q. Then you ask if you can connect on Monday,
20 right?

21 A. Yes.

22 Q. Then you say, (Reading:) I'd like to introduce
23 you to my crisis comms specialist that focuses on
24 diversity and culture, Melissa Nathan.

25 Do you see that?

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1 A. I do.

2 Q. Does Melissa Nathan focus on diversity and
3 culture?

4 A. Among other things. She's very good with that.

5 Q. Does she focus on diversity and culture more
6 than she focuses on entertainment?

7 MR. COOLEY: Objection.

8 THE WITNESS: I don't know that those are
9 different.

10 Q. (BY MR. GOTTLIEB) Are they the same in your
11 view?

12 A. Could be.

13 Q. You say, (Reading:) Melissa and/or her team
14 can connect with you today so we can get their
15 perspective. Let me know if you're open to that; I can
16 get their feedback team, my forensic team's results, and
17 then we can connect on Monday.

18 Do you see that?

19 A. I do.

20 Q. But you had no intention of getting your
21 forensic team's results by Monday. Is that what I
22 understand you to be saying?

23 A. I need more details.

24 Q. Why do you need more details than what you
25 wrote?

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1 A. I -- I don't recall exactly.

2 Q. Well, I mean, how often do you tell people that
3 you have some team working on something, when it's not
4 true?

5 A. It's puffery.

6 Q. This is puffery? Okay.

7 You say, (Reading:) Either way this is our
8 wheelhouse and I'm happy to discuss.

9 Do you see that?

10 A. I do.

11 Q. What are you trying to convey when you tell
12 somebody "this is our wheelhouse"?

13 A. It's crisis management.

14 Q. And you're trying to convey to [REDACTED] that
15 the problem she's facing is in the wheelhouse of you and
16 Ms. Nathan, right?

17 A. I don't know specifically. Crisis management
18 is the wheelhouse.

19 Q. But you're not talking about crisis management
20 generally to [REDACTED], right? You're talking about
21 the problems she's facing?

22 A. We don't know the details yet.

23 Q. So you were saying then that all crisis
24 management is in your wheelhouse?

25 A. I don't know exactly what there -- what's being

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1 the Texas case. In fact, Ms. Lively has prevented us
2 from taking discovery in the Texas case. So if -- if
3 your questions are limited to the New York case where
4 the accusations are clear about what she's alleging,
5 I'll let him answer. But I don't want him answering
6 questions about the Texas case.

7 MR. GOTTLIEB: Well, as you recall in
8 Ms. Lively's deposition, you, in your limited time, and
9 it was limited, asked her questions about the Texas 202
10 position, correct?

11 MR. BABCOCK: Well, I asked her what I
12 asked her.

13 MR. GOTTLIEB: Okay.

14 MR. BABCOCK: But I wasn't asking her about
15 the Texas case.

16 Q. (BY MR. GOTTLIEB) I'm not asking you
17 specifically about allegations in your Texas complaint.
18 Okay?

19 A. Okay.

20 Q. But at any point in time, perhaps other than
21 your allegations in your Texas complaint, have you ever
22 claimed or alleged that Ms. Lively fabricated her
23 allegations of sexual harassment?

24 A. Not that I recall.

25 Q. Has -- have you ever had, to your knowledge, a

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1 Q. Okay. At any point in time, did you gain that
2 understanding?

3 A. As I said, he's my lawyer since 2020. That was
4 my first phone call. We were trying to process what it
5 meant.

6 Q. All right. Did you understand when you
7 received this email and the attached cease and desist
8 letter that you were required to preserve all documents
9 concerning Ms. Lively's sexual harassment allegations
10 against Mr. Baldoni and other Wayfarer parties?

11 MR. BABCOCK: I don't need to say this, but
12 exclude conversations with a -- your lawyer. Lawyers.

13 THE WITNESS: Yes.

14 Ask the question again, I'm sorry.

15 Q. (BY MR. GOTTLIEB) Did you understand that this
16 letter required you to preserve all documents concerning
17 Ms. Lively's sexual harassment allegations against
18 Mr. Baldoni and other Wayfarer parties?

19 A. I did.

20 Q. And did you understand that the document or
21 the -- sorry. Did you understand that you were required
22 to preserve all documents concerning Ms. Lively's
23 retaliation allegation against the Wayfarer parties?

24 A. I did.

25 Q. Did you understand that preservation

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1 requirement to extend to electronically stored
2 information?

3 A. Yes.

4 Q. And you saw the long description of
5 electronically stored information in this letter as you
6 were reviewing it?

7 A. I did.

8 Q. You saw that that included things like WhatsApp
9 and Signal?

10 A. I did.

11 Q. And emails and text messages?

12 A. Yes.

13 Q. Okay. What steps did you take, and I don't
14 want to know about conversations that you had with your
15 counsel. But what steps, if any, did you personally
16 take to preserve documents after receiving this letter?

17 A. I called my lawyer.

18 Q. Okay. Apart from talking to your attorneys,
19 which I will not ask you about, did you take any steps
20 personally to engage in document preservation for your
21 devices?

22 A. I did what they suggested.

23 Q. Okay. Did you -- did you personally go into
24 your phone and change any settings, retention settings
25 on your Signal app after receiving this letter?

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1 A. I don't recall doing that.

2 Q. Okay. Do -- do you recall examining the
3 retention settings on the Street Relations email
4 accounts?

5 A. I don't recall.

6 Q. Do you -- do you know one way or the other
7 whether the Street Relations email account have
8 retention settings on them?

9 A. Yeah, they retain everything --

10 Q. For how long?

11 A. -- from my understanding. I don't recall.

12 Q. Okay. So you don't know if that's indefinite
13 or for some period of time?

14 A. I don't as we sit here.

15 Q. Okay. Do you recall going into your WhatsApp
16 account and changing any settings in that?

17 A. I don't recall.

18 Q. And how about in iMessage, do you recall
19 looking at any settings that you might have had with
20 respect to data retention on the cloud for -- for Apple
21 or for your device with Apple?

22 A. I don't recall.

23 Q. You, from time to time, use the -- the voice
24 note feature; is that right?

25 A. Yes.

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1 Q. And am I right that the voice note feature is
2 configured in a way on Apple devices where voice notes
3 will not automatically be saved to devices?

4 A. I -- I don't know the specifics.

5 Q. Okay.

6 A. What's the question again, what you're asking?

7 Q. Do you know if on your device, the -- the voice
8 notes that you send or receive are automatically saved
9 to your device or whether you have to save them
10 yourself?

11 A. I -- I don't know offhand.

12 Q. Okay. So you don't know one way or the other
13 whether, for example, if you send a voice note to
14 someone in the context of a text thread whether that is
15 saved, that being the voice note, along with the text
16 thread?

17 A. I'd need to know more specifics.

18 Q. Okay. But you don't know, right?

19 A. I -- not offhand.

20 Q. Okay. Apart from your Street Relations email,
21 do you use any other email account?

22 A. There's a Mac address.

23 Q. Okay.

24 A. Nothing for business.

25 Q. Have you ever received or sent, whether

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1 THE WITNESS: Yeah, I -- I -- I don't -- I
2 don't recall.

3 Q. (BY MR. GOTTLIEB) So you can't rule it out?

4 MR. COOLEY: Objection.

5 THE WITNESS: I -- I need to know more
6 details.

7 Q. (BY MR. GOTTLIEB) You've got to answer my
8 question, sir. It's a yes or no question. Can you rule
9 out the possibility that you were on a Signal chain with
10 Katie Case and Melissa Nathan as this -- on the date of
11 this message here, August 8th, 2024?

12 MR. COOLEY: Same objection.

13 MR. BABCOCK: Me too.

14 THE WITNESS: Yeah, I -- I don't know what
15 indicates this is a Signal message, so I'd need to know
16 more information.

17 Q. (BY MR. GOTTLIEB) Okay. You were
18 communicating with people at TAG by this time in August
19 of 2024, right, on Signal?

20 A. Sure, yes.

21 Q. Including Melissa Nathan?

22 A. Correct.

23 Q. Okay. And you just don't recall whether this
24 is among the Signal messages that -- or Signal chains
25 that you were on?