

# **Exhibit 173**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 -----  
4

BLAKE LIVELY,

Plaintiff,

5  
6 - v - 24-cv-10049 (lead case);  
25-cv-449

7 WAYFARER STUDIOS LLC, JUSTIN BALDONI,  
8 JAMEY HEATH, STEVE SAROWITZ, IT ENDS WITH  
9 US MOVIE LLC, MELISSA NATHAN, THE AGENCY  
GROUP PR LLC, JENNIFER ABEL, JED WALLACE,  
STREET RELATIONS INC.,

Defendants.

10 No. 1:24-cv-10049-LJL  
11 (Consolidated with 1:25-cv-00449-LJL)  
12 -----

13 WAYFARER STUDIOS LLC, JUSTIN BALDONI,  
14 JAMEY HEATH, IT ENDS WITH US MOVIE LLC,  
MELISSA NATHAN, and JENNIFER ABEL,

Plaintiffs,

15 - v -  
16 BLAKE LIVELY, RYAN REYNOLDS, LESLIE  
17 SLOANE, VISION PR, INC., THE NEW YORK  
TIMES COMPANY,

Defendants.

18 -----  
19  
20 HIGHLY CONFIDENTIAL  
ATTORNEYS' EYES ONLY

21  
22 VIDEOTAPED DEPOSITION OF  
LESLIE SLOANE  
23 Ft. Lauderdale, Florida  
September 26, 2025  
24

25 Reported By:  
ERIC J. FINZ

1 LESLIE SLOANE - HIGHLY CONFIDENTIAL

2 Q. And how long have you worked 00:08:24  
3 as a publicist? 00:08:27

4 A. I think I am -- I think I've 00:08:28  
5 been in the business for 35 years as a 00:08:32  
6 publicist, 31-and-a-half. 00:08:34

7 Q. And is part of the job of a 00:08:37  
8 publicist to suppress negative stories 00:08:40  
9 that may be published about his or her 00:08:42  
10 client? 00:08:45

11 MS. McCAWLEY: Objection. 00:08:47

12 MS. GOVERNSKI: Join. 00:08:48

13 A. Part of my job is to receive 00:08:49  
14 incoming calls or to take incoming calls 00:08:52  
15 and to try to balance out stories if 00:08:55  
16 they're negative and if they're untrue. 00:08:57

17 Q. When you say "balance out," 00:08:59  
18 what do you mean by that? 00:09:01

19 A. When you balance a story, and 00:09:02  
20 I get calls often for many clients, most 00:09:04  
21 of the time with wrong information, I 00:09:09  
22 usually try to work with them on just 00:09:14  
23 ignore them to try to get it balanced. 00:09:16

24 Q. How do you know the 00:09:18  
25 information is wrong in any given 00:09:19

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2 MS. McCAWLEY: Objection. 01:39:47

3 A. -- I can't recall. 01:39:47

4 Q. So sitting here today, those 01:39:48

5 items you just mentioned, you don't know 01:39:50

6 which of the actors, whether it's Isabela 01:39:52

7 or one of the other actors, you don't 01:39:54

8 know who said what. Is that correct? 01:39:57

9 A. Yes, that is correct. 01:39:58

10 Q. Why did you need to -- why did 01:39:59

11 you deem it necessary, if you did, to 01:40:04

12 tell Sara Nathan that the whole cast 01:40:07

13 isn't speaking with Justin Baldoni? 01:40:09

14 MS. McCAWLEY: Objection. 01:40:11

15 A. Probably to soften up the 01:40:13

16 article that she was going to write about 01:40:16

17 my client. 01:40:18

18 Q. There was going to be negative 01:40:21

19 content about Blake Lively in the 01:40:23

20 article? 01:40:24

21 MS. McCAWLEY: Objection. 01:40:25

22 A. From our conversation, there 01:40:26

23 was going to be negative about Justin and 01:40:28

24 Blake in the article. And it is my job 01:40:31

25 as a publicist to try to make it a fair 01:40:32

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2 story. So yes, I deemed it necessary to 01:40:36

3 give that information. 01:40:38

4 Q. You wanted Sara Nathan to 01:40:38

5 print the alleged fact that the whole 01:40:40

6 cast isn't speaking with Justin. 01:40:42

7 Correct? 01:40:45

8 MS. McCAWLEY: Objection. 01:40:46

9 MS. GOVERNSKI: Objection. 01:40:46

10 A. I never said "alleged." 01:40:47

11 Q. You wanted Sara Nathan to 01:40:48

12 print that the whole cast isn't speaking 01:40:50

13 with Justin. Correct? 01:40:52

14 MS. McCAWLEY: Objection. 01:40:53

15 MS. GOVERNSKI: Join. 01:40:54

16 A. I just shared it with Sara 01:40:55

17 Nathan to give some perspective, yes. 01:40:57

18 Q. Okay. And you testified, 01:40:59

19 "It's my job as a publicist to try to 01:41:02

20 make it a fair story." Do you recall 01:41:05

21 that testimony? 01:41:07

22 A. I think I said the word 01:41:08

23 "balanced." 01:41:10

24 Q. Okay. And you thought the way 01:41:11

25 to balance the story was to include an 01:41:17

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2 additional negative statement about 01:41:21

3 Justin. Correct? 01:41:23

4 MS. GOVERNSKI: Objection. 01:41:25

5 MS. McCAWLEY: Objection. 01:41:25

6 A. I took it as talking -- 01:41:27

7 speaking the truth. 01:41:30

8 Q. But you wanted her to print 01:41:32

9 this negative fact about Justin. 01:41:34

10 Correct? 01:41:35

11 MS. McCAWLEY: Objection. 01:41:37

12 A. I never said I wanted her to 01:41:38

13 print it. I wanted her to have the 01:41:39

14 information. 01:41:41

15 Q. And you wanted her to have the 01:41:41

16 information so that she would print it. 01:41:43

17 Correct? 01:41:44

18 MS. GOVERNSKI: Objection. 01:41:45

19 MS. McCAWLEY: Objection. 01:41:45

20 A. Again, I've never said I 01:41:46

21 wanted her to print it. I wanted to 01:41:48

22 share the information so we balance out 01:41:50

23 the story. 01:41:51

24 Q. Well, you wrote I need artist 01:41:52

25 sauce whole cast isn't speaking with him. 01:41:55

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2 Do you see that? 01:41:55

3 A. I had said before I saw that, 01:41:59

4 yes. 01:42:00

5 Q. What did you mean by "need"? 01:42:00

6 A. Again, I don't recall what 01:42:04

7 artist sauce is. So I don't know. 01:42:05

8 Q. Okay. And you wanted Sara 01:42:08

9 Nathan to include the statement that the 01:42:10

10 whole cast isn't speaking with Justin 01:42:13

11 because it would somehow make Blake 01:42:15

12 Lively look better? 01:42:17

13 MS. GOVERNSKI: Objection. 01:42:18

14 MS. MCCAWLEY: Objection. 01:42:19

15 A. Again, I said, I shared it 01:42:19

16 with Sara Nathan to try to balance out 01:42:22

17 the story. That is her choice whether 01:42:25

18 she would write it or not. 01:42:27

19 Q. What do you mean by "balance 01:42:28

20 out the story"? 01:42:29

21 A. As I stated previously, it was 01:42:30

22 going to be a story about both of them. 01:42:32

23 And if you go to the pages that I'm 01:42:34

24 looking at, there was going to be some 01:42:36

25 backlash with Blake felt he looked at her 01:42:41

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2 while she was breastfeeding, he lingered 01:42:46

3 too long while kissing her in a scene, 01:42:48

4 told her she smelled good, all of it 01:42:51

5 creepy. So I took that, that this was 01:42:55

6 not going to be a positive story for 01:42:57

7 either of them, while opening a movie. 01:42:59

8 Q. And you felt it necessary to 01:42:59

9 pile on with the negative statements 01:43:01

10 about Justin. Correct? 01:43:02

11 MS. GOVERNSKI: Objection. 01:43:04

12 MS. MCCAWLEY: Objection. 01:43:05

13 A. I felt it necessary to share 01:43:06

14 that with her, yes. 01:43:08

15 Q. Okay. And then you also 01:43:09

16 mentioned, they had spectate screening 01:43:11

17 rooms at the premiere. Sorry, a -- what 01:43:15

18 does that mean? 01:43:18

19 A. They had separate screening 01:43:19

20 rooms. There were three different 01:43:22

21 screening rooms at the premiere. 01:43:24

22 Q. Why did you tell Sara Nathan 01:43:25

23 that? 01:43:27

24 A. I kind of feel something's 01:43:27

25 missing here. Because there is some 01:43:30



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2 LS 246.) 03:08:38

3 BY MR. FRITZ: 03:08:38

4 Q. Ms. Sloane, we've handed you 03:08:39

5 what's been marked as Sloane Exhibit 12. 03:08:43

6 It's a text message or chain of text 03:08:46

7 messages starting with LS 0000243. 03:08:48

8 A. Mm-hmm. 03:08:52

9 Q. Do you recognize these text 03:08:53

10 messages? 03:08:54

11 A. Yes. 03:08:55

12 Q. Okay. And is James V the 03:08:56

13 reporter from the Daily Mail? 03:08:59

14 A. Yes. 03:09:00

15 Q. Okay. So do you see on the 03:09:00

16 second page of the document, which is the 03:09:04

17 first page on which there are any text 03:09:06

18 messages, on the morning of August 8th, 03:09:08

19 James writes to you, well, it's a lot to 03:09:11

20 text but it's regarding probs on the set 03:09:14

21 involving her and Justin Baldoni and 03:09:18

22 fallout over that with Blake being 03:09:21

23 labeled as difficult and a power struggle 03:09:23

24 existing. 03:09:26

25 Do you see that? 03:09:27

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2 A. Yes. 03:09:28

3 Q. Okay. And you responded, your 03:09:28

4 info is totally off. Correct? 03:09:32

5 A. Yes. 03:09:34

6 Q. Why did you believe that that 03:09:35

7 information was totally off? 03:09:37

8 A. Because I was not aware that 03:09:39

9 there were any struggles. 03:09:40

10 Q. Right. 03:09:42

11 But you think you testified a 03:09:43

12 few moments ago you didn't know one way 03:09:45

13 or the other whether there was a power 03:09:48

14 struggle. Correct? 03:09:50

15 MS. McCAWLEY: Objection. 03:09:51

16 A. I thought I said if I was 03:09:51

17 incorrect, that I was unaware that there 03:09:54

18 were any issues on the set. 03:09:56

19 Q. Right. 03:09:58

20 So if you're unaware, isn't it 03:09:58

21 fair to say that you had no basis to tell 03:10:01

22 him that what he was telling you was 03:10:03

23 totally off? 03:10:06

24 MS. McCAWLEY: Objection. 03:10:07

25 A. Not necessarily, no. 03:10:08

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2 Q. Okay. When you told him that 03:10:09  
3 the info was totally off, was the sole 03:10:10  
4 basis for that statement because you 03:10:13  
5 hadn't heard of the issues? 03:10:15

6 MS. McCAWLEY: Objection. 03:10:16

7 A. That I can't recall. 03:10:17

8 Q. Then toward the middle of the 03:10:23  
9 page, James from the Daily Mail writes, 03:10:31  
10 one of them said that Blake and Ryan 03:10:36  
11 insisted on rewriting the movie. 03:10:38

12 Do you see that? 03:10:38

13 A. Is this on the same page? 03:10:44

14 Q. It is. Towards the middle. 03:10:45  
15 The text at 10:35 a.m. 03:10:48

16 A. Oh, thank you. Okay. 03:10:51

17 Oh, okay. That's within -- 03:10:57  
18 that's embedded within one of those. 03:11:00  
19 Okay. 03:11:03

20 Okay, yes, I see that. 03:11:09

21 Q. So when you got this text 03:11:11  
22 message, did you know one way or the 03:11:12  
23 other whether Blake and Ryan insisted on 03:11:14  
24 rewriting the movie? 03:11:17

25 A. No, I did not. 03:11:21

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2 Q. Okay. And in these text 03:11:23  
3 messages, James is telling you that he 03:11:33  
4 learned of this information, according to 03:11:35  
5 him, from Stephanie Jones. Correct? 03:11:38

6 MS. ANASTASIO: Objection. 03:11:56

7 MS. GOVERNSKI: Join. 03:11:57

8 A. Well, as James states, I see 03:11:58  
9 what you're referring to at 11:17. 03:12:00

10 Q. Okay. 03:12:03

11 A. So what is the question you're 03:12:03  
12 asking me, I apologize. 03:12:05

13 Q. Did you have an understanding 03:12:06  
14 from him that he had received this 03:12:07  
15 information from Stephanie Jones? 03:12:08

16 MS. GOVERNSKI: Objection. 03:12:11

17 MS. ANASTASIO: Join. 03:12:15

18 Q. Or someone else? 03:12:18

19 A. I don't remember what I 03:12:19  
20 believed. 03:12:19

21 Q. And then you see at the bottom 03:12:20  
22 you wrote, I promise she is lying? 03:12:21

23 A. Yes. 03:12:24

24 Q. "She" is a reference to 03:12:24  
25 Stephanie Jones? 03:12:26

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2 A. I don't recall. 03:12:30

3 Q. Okay. Whoever you were 03:12:31

4 referring to, how were you able to 03:12:34

5 promise that she was lying? 03:12:36

6 A. I probably misspoke at the 03:12:49

7 time. 03:12:52

8 Q. Okay. It's fair to say you 03:12:52

9 didn't know one way or the other at the 03:12:54

10 time you received these text messages 03:12:55

11 whether Blake and Ryan insisted on 03:12:57

12 rewriting the movie. Correct? 03:12:59

13 MS. McCAWLEY: Objection. 03:13:02

14 A. That would be correct. 03:13:02

15 Q. You can put that aside, thank 03:13:22

16 you. 03:13:24

17 (Sloane Exhibit 13 for 03:13:24

18 identification, text messages, 03:13:24

19 production numbers LS 314 through 03:13:24

20 LS 318.) 03:13:47

21 BY MR. FRITZ: 03:13:47

22 Q. You've been handed what's been 03:13:48

23 marked as Sloane Exhibit 13. Which is a 03:13:50

24 text chain starting with Bates stamp LS 03:13:53

25 0000314. 03:13:56

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2 Q. How was anything in this text 03:55:14

3 going to hurt Blake? 03:55:18

4 MS. McCAWLEY: Objection; 03:55:20

5 asked and answered. 03:55:21

6 A. Again, I cannot recall. 03:55:21

7 Q. Do you see where you wrote, 03:55:24

8 you are airing an animal? 03:55:27

9 A. Yes. 03:55:29

10 Q. Who is the animal you were 03:55:29

11 referring to? 03:55:31

12 A. I think I have previously 03:55:31

13 stated that it was Justin Baldoni. 03:55:41

14 Q. What basis did you have to 03:55:44

15 call him an animal? 03:55:46

16 A. I think I also say that that 03:55:48

17 was my take on him, and I had the right 03:55:52

18 to my own opinion. 03:55:55

19 Q. So I'm asking what basis you 03:55:56

20 had to call him an animal? 03:55:58

21 A. I felt like it. 03:56:01

22 Q. Okay. Why? 03:56:02

23 A. I felt like it. 03:56:04

24 Q. Yeah. Why did you feel the 03:56:05

25 need to call him an animal? 03:56:07

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2 A. Yes. And I answered because 04:06:18  
3 he hired Melissa Nathan, correct. 04:06:20

4 Q. So are you assuming that 04:06:22  
5 because Justin Baldoni hired Melissa 04:06:24  
6 Nathan that he had done anything to smear 04:06:27  
7 Blake Lively's reputation? 04:06:32

8 MS. MCCAWLEY: Objection. 04:06:33

9 A. I'm not assuming. Melissa 04:06:34  
10 Nathan did share with me on a phone call 04:06:36  
11 that she was hired to come in to clean 04:06:39  
12 his messes up. That he was lucky to have 04:06:41  
13 her. He did some stupid things. So 04:06:44  
14 yeah. 04:06:46

15 Q. Did she tell you that she was 04:06:47  
16 going to seed or plant negative press 04:06:49  
17 about Blake Lively on Justin's behalf? 04:06:51

18 A. It was the opposite. She told 04:06:54  
19 me she wasn't doing it. 04:06:56

20 Q. Okay. So again, what basis 04:06:57  
21 did you have to believe that Justin 04:06:59  
22 Baldoni or Melissa Nathan had anything to 04:07:03  
23 do with the negative press that Blake 04:07:06  
24 Lively was receiving as of August 13th? 04:07:08

25 MS. GOVERNSKI: Objection. 04:07:10

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2 those even though it would put Justin in 04:56:17

3 a negative light. Correct? 04:56:19

4 MS. McCAWLEY: Objection. 04:56:21

5 A. As you can read, my response 04:56:22

6 says, it's in the press already, so it's 04:56:25

7 already out there. 04:56:27

8 Q. So in your world is it okay to 04:56:28

9 tell a reporter to include negative 04:56:30

10 statements about someone if someone else 04:56:33

11 in the press has already reported it, is 04:56:35

12 that your testimony? 04:56:37

13 MS. McCAWLEY: Objection. 04:56:38

14 A. I was okay with that, yes. 04:56:39

15 Q. Okay. Do you have an 04:56:40

16 understanding of what Blake Lively's 04:56:43

17 allegations are with respect to 04:56:45

18 retaliation in this case? 04:56:47

19 MS. McCAWLEY: Objection. I'm 04:56:49

20 just going to instruct you to the 04:56:50

21 extent that you have information as 04:56:52

22 a result of your conversations with 04:56:53

23 your attorneys, you cannot respond. 04:56:55

24 If you have it independent of that, 04:56:56

25 you're welcome to respond. 04:56:58

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2 than one thing from James? I'm 05:57:41

3 sorry, I have to read the email, 05:57:42

4 all the paperwork from James. 05:57:46

5 I feel the fact that you're 05:59:32

6 asking me that question that it's 05:59:33

7 somewhere here. 05:59:35

8 Q. Why do you assume that? 05:59:35

9 A. Because every time you ask me 05:59:36

10 a question you produce a document. I've 05:59:38

11 noticed your pattern. I pick up on 05:59:40

12 things. And I'm not going to get in 05:59:43

13 trouble for this. 05:59:52

14 MR. FRITZ: I'm happy to 05:59:53

15 withdraw the question and move on. 05:59:54

16 It's not in any of the documents 05:59:56

17 I've shown you so far. 05:59:58

18 THE WITNESS: Then thank you, 05:59:59

19 please move on. Because I can't 06:00:01

20 answer that. 06:00:02

21 Q. Did James from the Daily Mail 06:00:06

22 ever tell you that Melissa Nathan had not 06:00:08

23 done anything anti-Blake? 06:00:13

24 Do you recall that? 06:00:16

25 MS. GOVERNSKI: Objection. 06:00:17

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2 MS. McCAWLEY: Join. 06:00:18

3 A. Yes. 06:00:19

4 Q. Did you, at the time, have any 06:00:19

5 reason to disbelieve him? 06:00:22

6 A. In that case, knowing their 06:00:26

7 friendship, I questioned it. 06:00:28

8 Q. Okay. 06:00:32

9 A. And her close relationship 06:00:35

10 with the Daily Mail and the entire L.A. 06:00:37

11 office. And that her sister over the 06:00:39

12 years had told me how close they were to 06:00:41

13 all the women at the Daily Mail. Yes. 06:00:44

14 Q. Have you ever seen any 06:00:46

15 documents, emails, text messages from 06:00:54

16 Melissa Nathan to anyone demonstrating 06:00:58

17 that Melissa Nathan caused anything 06:01:02

18 negative to be written about Blake 06:01:05

19 Lively? 06:01:07

20 MS. GOVERNSKI: Objection. 06:01:07

21 MS. McCAWLEY: Objection. 06:01:08

22 A. I've seen texts in the 06:01:11

23 complaints that we can -- that she made a 06:01:15

24 reference to a reporter that Jen Abel had 06:01:22

25 or Jen Abel did both of them, they had 06:01:25

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