

Exhibit 173

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

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

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,
STREET RELATIONS INC.,

Defendants.

№. 1:24-cv-10049-LJL

(Consolidated with 1:25-cv-00449-LJL)

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

Plaintiffs,

- V -

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., THE NEW YORK
TIMES COMPANY,

Defendants.

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VIDEOTAPED DEPOSITION OF
LESLIE SLOANE
Ft. Lauderdale, Florida
September 26, 2025

Reported By:
ERIC J. FINZ

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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. GOVERNNSKI: 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. GOVERNNSKI: 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. GOVERNNSKI: 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. GOVERNNSKI: 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. GOVERNNSKI: 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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Do you see that? 01:41:55

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

yes. 01:42:00

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

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

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

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

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

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

because it would somehow make Blake 01:42:15

Lively look better? 01:42:17

MS. GOVERNSKI : Objection. 01:42:18

MS. GOVERNSKI: Objection.

MS. McCAWLEY: Objection. 01:42:19

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

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

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

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

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

out the story?" 01:42:29

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

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

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

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

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. GOVERNNSKI: 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 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. GOVERNNSKI: 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. GOVERNNSKI: 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. GOVERNNSKI: 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

1 LESLIE SLOANE - HIGHLY CONFIDENTIAL
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. GOVERNNSKI: 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. GOVERNISKI: 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