

Exhibit 248

CONFIDENTIAL

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3

4 STEPHANIE JONES, JONESWORKS LLC,

5 Plaintiffs,

6

-against-

7

JENNIFER ABEL, MELISSA NATHAN, JUSTIN
BALDONI, WAYFARER STUDIOS LLC, and JOHN
DOES 1-10,

8 Defendants.

9

Case No. 1:25-cv-00779-LJL

10

11 September 30, 2025

12

13 10:02 a.m.

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CONFIDENTIAL DEPOSITION of
JUSTINE HARRIS, taken by Defendants,
pursuant to Notice, held at the offices
of MEISTER SEELIG & FEIN PLLC, 125 Park
Avenue, New York, New York before Wayne
Hock, a Notary Public of the State of
New York.

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1	ownership interests in the corporate	10:08:50
2	entity.	10:08:51
3	There were also two public	10:08:52
4	filings related to Vanzan that I also	10:08:59
5	reviewed.	10:09:00
6	Q. Who are the owners of Vanzan?	10:09:01
7	A. Blake Lively and her husband	10:09:02
8	Ryan Reynolds are each fifty percent	10:09:07
9	owners in the company.	10:09:10
10	Q. Has that always been the	10:09:12
11	case?	10:09:14
12	A. Yes.	10:09:14
13	Q. And who are the officers of	10:09:14
14	Vanzan?	10:09:16
15	A. Ms. Lively is the president.	10:09:16
16	Ryan Reynolds is the vice president and	10:09:18
17	the CFO.	10:09:20
18	Q. And has that always been the	10:09:21
19	case?	10:09:24
20	A. Yes.	10:09:24
21	Q. And what are their duties as	10:09:24
22	each, if you know?	10:09:26
23	A. Their -- I could describe to	10:09:27
24	you the general business and purpose of	10:09:33
25	Vanzan and I think that would help	10:09:36

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1 explain what their duties are. 10:09:38
2 Q. Sure. 10:09:40
3 A. Vanzan was established after 10:09:41
4 they were married in 2019 to handle 10:09:45
5 payroll and other administrative 10:09:50
6 matters for a variety of household 10:09:53
7 employees of Mr. Reynolds and Ms. 10:09:56
8 Lively. As described as I learned from 10:09:59
9 Allen Chanzis, there's a variety of 10:10:02
10 paperwork, not only payroll, but each 10:10:08
11 of the employees -- a hundred percent 10:10:11
12 of the employees who are paid through 10:10:13
13 Vanzan have nondisclosure agreements. 10:10:15
14 There are health benefits and other 10:10:21
15 employee benefits that are handled 10:10:23
16 through Vanzan, sometimes paperwork 10:10:27
17 related to other administrative 10:10:27
18 matters, bonuses are paid out at 10:10:28
19 year-end. And so Ms. Lively's role as 10:10:30
20 president of Vanzan involves delegating 10:10:38
21 and giving authority to Mr. Chanzis, 10:10:40
22 who is the business manager with 10:10:45
23 respect to matters relating to those 10:10:48
24 topics. 10:10:50
25 Q. And has she given that 10:10:51

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1 A. I don't know if, sitting here 10:32:06
2 today, I can remember every question 10:32:08
3 and every answer. But essentially she 10:32:10
4 described -- we walked through the 10:32:13
5 e-mail correspondence that I believe 10:32:15
6 was produced in -- by Vanzan in 10:32:17
7 connection with the subpoena that was 10:32:20
8 served and explained the nature of the 10:32:22
9 communications that she had with Quinn 10:32:26
10 Emanuel about technical issues with the 10:32:31
11 productions, the scope of the subpoena, 10:32:34
12 what kinds of searches were conducted 10:32:37
13 or not. 10:32:40
14 She also confirmed that they 10:32:41
15 did receive, in fact, the materials 10:32:44
16 from Quinn Emanuel who at the time was 10:32:47
17 representing Jones and Jonesworks. 10:32:52
18 She also confirmed that, to 10:32:56
19 her knowledge, there were no 10:32:59
20 communications between Vanzan and Jones 10:33:00
21 or Jonesworks until she, as Vanzan's 10:33:04
22 representative, began to engage in 10:33:09
23 communications with a representative 10:33:12
24 from Jones and Jonesworks in connection 10:33:13
25 with service of the subpoena and the 10:33:17

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1	collection of documents.	10:33:20
2	Q. Did she tell you about any	10:33:21
3	oral communications she had with	10:33:23
4	Stephanie Jones or any representatives	10:33:27
5	thereof?	10:33:30
6	A. She did -- she did not -- she	10:33:31
7	said her -- excuse me, withdrawn. Let	10:33:35
8	me start again.	10:33:38
9	Her communications with Jones	10:33:39
10	and Jonesworks as in her capacity as a	10:33:45
11	representative of Vanzan were limited	10:33:50
12	to the communications she had with	10:33:53
13	Quinn Emanuel.	10:33:55
14	Q. Did you ever ask Ms. Bender	10:33:57
15	if anyone on behalf of Blake Lively	10:33:59
16	spoke with anyone on behalf of	10:34:03
17	Stephanie Jones via phone?	10:34:05
18	MS. O'DONNELL: Objection as	10:34:07
19	to form. Objection. Outside the	10:34:08
20	scope of the topics.	10:34:11
21	MR. BRUNO: Join.	10:34:12
22	THE WITNESS: I inquired of	10:34:12
23	both Ms. Bender and Ms. Lively	10:34:16
24	whether Vanzan, which I understand	10:34:20
25	to be the topic listed, whether	10:34:21

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1	to try to keep recounting to the	10:57:11
2	best of my ability exactly the	10:57:16
3	nature of the conversation.	10:57:17
4	Ms. Lively had given the	10:57:19
5	information to counsel, the	10:57:24
6	information she had learned from	10:57:26
7	Ms. Jones subsequent to that. As	10:57:28
8	president of Vanzan, she engaged	10:57:33
9	and Vanzan engaged counsel prior	10:57:38
10	about eight or nine days, I think,	10:57:42
11	roughly prior to the filing of the	10:57:45
12	state court litigation. Ms. Lively	10:57:47
13	confirmed that she, on behalf of	10:57:51
14	Vanzan, authorized the filing of	10:57:53
15	the lawsuit. She then, subsequent	10:57:55
16	to the filing of the lawsuit in	10:58:01
17	state court, as president of	10:58:03
18	Vanzan, authorized the service of	10:58:06
19	the subpoena. She then, again, in	10:58:08
20	her capacity as Vanzan president,	10:58:16
21	received and reviewed the materials	10:58:18
22	produced by Jonesworks in response	10:58:21
23	to the subpoena.	10:58:23
24	Subsequent to that, she	10:58:26
25	authorized the dismissal, the	10:58:29

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1	voluntary dismissal of the lawsuit	10:58:31
2	in December of 2024.	10:58:34
3	She also confirmed that other	10:58:37
4	than whatever communications her	10:58:44
5	lawyer -- excuse me, whatever	10:58:47
6	communications Vanzan's lawyers had	10:58:49
7	had with Quinn Emanuel about the	10:58:51
8	service of the subpoena in	10:58:53
9	connection with the state court	10:58:57
10	litigation, she confirmed that	10:58:59
11	Vanzan did not have any	10:59:02
12	communications with Jones or	10:59:03
13	Jonesworks at all.	10:59:06
14	Q. You testified that Ms. Lively	10:59:09
15	told you that she authorized Vanzan to	10:59:14
16	file the state court lawsuit; right?	10:59:17
17	A. On behalf of Vanzan, that's	10:59:19
18	correct.	10:59:20
19	Q. Did you ask Ms. Lively why	10:59:20
20	she didn't commence that suit in her	10:59:23
21	own name?	10:59:25
22	MS. O'DONNELL: Objection.	10:59:26
23	You can answer.	10:59:28
24	THE WITNESS: I did not ask	10:59:29
25	that question.	10:59:31

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1	damages to Vanzan?	02:44:50
2	MR. BRUNO: Objection to form.	02:44:53
3	MS. O'DONNELL: Objection as	02:44:54
4	to form. Objection as to the	02:44:54
5	attorney-client privilege.	02:44:57
6	You can testify to the extent	02:44:58
7	your answer doesn't call for	02:45:00
8	disclosure of attorney-client	02:45:02
9	privileged communications.	02:45:04
10	THE WITNESS: I don't have	02:45:05
11	nonprivileged information that	02:45:13
12	would specifically identify the	02:45:18
13	basis or explain the lawyers'	02:45:20
14	decisions in paragraph four.	02:45:24
15	Q. With respect to paragraph	02:45:27
16	seven, can you tell me what	02:45:37
17	nonprivileged knowledge you have that	02:45:40
18	Vanzan is not privy to the names or	02:45:44
19	identities of the individual defendants	02:45:47
20	Does One through Ten?	02:45:50
21	MS. O'DONNELL: Objection as	02:45:51
22	to form. Asked and answered.	02:45:52
23	Discussed in paragraph seven.	02:45:55
24	Objection as to the attorney-client	02:45:56
25	privilege.	02:45:59

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1	You can answer to the extent	02:45:59
2	it doesn't require any disclosure	02:46:00
3	of attorney-client communications.	02:46:03
4	MR. BRUNO: Join.	02:46:07
5	THE WITNESS: So I, as	02:46:07
6	Vanzan's corporate representative,	02:46:17
7	do not have nonprivileged	02:46:21
8	information about the specific	02:46:24
9	allegation or the basis for the	02:46:29
10	allegation relating to the lack of	02:46:40
11	information about the individuals	02:46:43
12	who breached or upon information	02:46:46
13	and belief breached their	02:46:51
14	contractual obligations and other	02:46:54
15	obligations to Vanzan.	02:46:56
16	Q. I'm looking at paragraph	02:46:57
17	thirteen.	02:47:00
18	Can you tell me what	02:47:00
19	nonprivileged information or knowledge	02:47:01
20	that you have that, in or around August	02:47:04
21	of 2024, the Doe defendants breached	02:47:07
22	the Doe duties?	02:47:10
23	MS. O'DONNELL: Objection as	02:47:11
24	to form. Not objection as to form	02:47:12
25	but objection as to attorney-client	02:47:18