

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
8 BALDONI, WAYFARER STUDIOS LLC, and JOHN
9 DOES 1-10,

Defendants.

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

10
11 September 30, 2025
12 10:02 a.m.

13
14 CONFIDENTIAL DEPOSITION of
15 JUSTINE HARRIS, taken by Defendants,
16 pursuant to Notice, held at the offices
17 of MEISTER SEELIG & FEIN PLLC, 125 Park
18 Avenue, New York, New York before Wayne
19 Hock, a Notary Public of the State of
20 New York.

21
22
23
24
25
Page 1

CONFIDENTIAL

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

Page 12

CONFIDENTIAL

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

Page 13

CONFIDENTIAL

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

Page 38

CONFIDENTIAL

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

Page 39

CONFIDENTIAL

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

Page 63

CONFIDENTIAL

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

Page 64

CONFIDENTIAL

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

Page 224

CONFIDENTIAL

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

Page 225