

Exhibit 11

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
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WAYFARER STUDIOS LLC, ET AL.

Defendants.

JENNIFER ABEL,

Third-party Plaintiff,

vs.

JONESWORKS, LLC,

Third-party Defendant.

WAYFARER STUDIOS LLC, et al.

Consolidated Plaintiffs,

vs.

BLAKE LIVELY, et al.

Consolidated Defendants.

* * CONFIDENTIAL * *

VIDEO-RECORDED DEPOSITION OF ALEXANDRIA SAKS
Los Angeles, California
Wednesday, September 24, 2025

Stenographically Reported by: Ashley Soevyn,
CALIFORNIA CSR No. 12019
Job No. CA7624602
Pages 1 - 301

1 A Lightly. 10:52:24
2 Q Do you recall when they were?
3 A No.
4 Q Do you recall on which scenes
5 Mr. Sarowitz was on set for? 10:52:34
6 A I believe one of the days he was there
7 was the -- the day where we were in the fake
8 hospital scenes. I don't remember exactly the other
9 days.
10 Q Do you believe that Mr. Sarowitz was on 10:52:49
11 set during the days that you were filming scenes in
12 the hospital?
13 A Yes.
14 Q Would one of those scenes have been the
15 scene in which Ms. Lively's character gives birth? 10:52:59
16 A I think he was actually there at the end
17 of that day after that scene was over, but I -- I
18 honestly don't fully remember.
19 Q Were there multiple scenes being filmed
20 in the hospital -- 10:53:13
21 A Yes. Sorry.
22 Q That's okay. I will just ask again for
23 the -- a clean record.
24 Were there multiple scenes being filmed
25 in the hospital on the day that you recall 10:53:23

1 Mr. Sarowitz being on set? 10:53:25

2 A Yes.

3 Q And as you sit here, do you have a
4 specific recollection as to which scene he was
5 present for and not that day? 10:53:31

6 MS. GAROFALO: Objection.

12 BY MS. ROESER:

13 Q So you recall interacting with
14 Mr. Sarowitz on the day of filming in the hospital
15 scene later in the day, but you're not sure when he 10:54:00
16 was on set?

17 A Correct.

18 Q You referenced "the village." Can you
19 explain what that is?

20 A Yes. Video village is where there is a 10:54:08
21 monitor set up that is showing what is being filmed
22 on camera, where producers, studio executives,
23 financiers, can sit and watch with headphones on.

24 Q Are there certain scenes in which
25 village -- the -- a village or who is sitting in the 10:54:26

1 A Yes. 01:13:10

2 Q Exhibit 7 is marked "attorneys' eyes

3 only." When I begin questioning, again, we just ask

4 that Mr. Heath leave the room. And there appear to

5 be no other clients on the Zoom. 01:13:20

6 Looking to Exhibit 6, please.

7 A Yes.

8 Q You will direct your attention to the

9 message at 11:08 a.m. You write to Ms. Giannetti --

10 MS. GAROFALO: I'm sorry. I don't mean 01:13:40

11 to interrupt, but there are multiple versions of

12 Exhibit 7. Only this one is marked attorneys' eyes

13 only. It's been produced by multiple people, so we

14 can discuss at the next break.

15 MS. ROESE: We can discuss at the break, 01:13:56

16 but for questioning we will ask that Mr. Heath

17 leave, just in case.

18 MS. GAROFALO: That's fine.

19 BY MS. ROESE:

20 Q Ms. Saks, at 11:08 a.m. in Exhibit 6, you 01:14:02

21 send Ms. Giannetti a text that says:

22 (As read):

23 "Finishing up with brunch with Jenny.

24 We have real issues."

25 Do you see that? 01:14:13

1 A Yes. 01:14:14

2 Q Do you recall the brunch with Jenny -- is

3 that Jenny Slate?

4 A Yes.

5 Q Do you recall having brunch with Jenny 01:14:23

6 Slate in May 29, 2023, or around that time?

7 A I do.

8 Q And tell me about that brunch.

9 A I -- Jenny and I had had a meal prior to

10 this one, so I went into it thinking that it was a 01:14:35

11 friendly brunch, which it was to a degree. But

12 during it, she brought up some concerns that she was

13 having on the movie, which was the first time I was

14 hearing about them.

15 Q What concerns did Ms. Slate bring up 01:14:57

16 during your brunch on or around May 29th?

17 A I don't remember exact language that was

18 used, but there were a few. One was that in a

19 scene, I believe the week prior, Justin had

20 commented on her physical appearance, which made her 01:15:20

21 uncomfortable. That in an initial creative Zoom

22 meeting between Justin, Blake, and Jenny, Jenny and

23 Blake only found out at the very end of the Zoom

24 that Justin had been recording it the whole time.

25 And that made both Blake and Jenny, from Jenny's 01:15:44

1 point of view, feel very uncomfortable.

01:15:49

2 There was a mention of some -- some kind
3 of comments that Jamey had made to Jenny regarding
4 how generous they had been with her housing
5 allowance and that it was important for them to take 01:16:07
6 care of new mothers, and that made her
7 uncomfortable. And then, there was a lot of other
8 conversation, nonspecific, but that she was
9 uncomfortable in both of their presences and really
10 would prefer to never see Jamey again, knowing that 01:16:28
11 Justin was the director and co-star she would have
12 to.

13 Q Ms. Slate says that she never wanted to
14 see Mr. Heath again?

15 A Correct.

01:16:41

16 Q And it's your impression that Ms. Slate
17 knew that she would have to see Mr. Baldoni because
18 he was the director and co-star, but perhaps she
19 didn't want to see him either?

20 A I can't speak to that, but that was my 01:16:50
21 assumption.

22 Q You said a lot there. So I want to break
23 it down a little, okay?

24 A Okay.

25 Q You mentioned that Ms. Slate raised -- 01:17:03

1 MS. ROESER: Sorry. My transcript is 01:17:05
2 just not following along.

3 BY MS. ROESER:

4 Q Sorry about that.

5 You raised -- so you testified that 01:17:05
6 Ms. Slate raised, during your brunch in May, that
7 Mr. Baldoni had commented on her physical appearance
8 which made her uncomfortable, right?

9 A That Justin commented on her physical
10 appearance, yes. 01:17:37

11 Q And do you recall if Ms. Slate told you
12 whether that happened while a scene was being
13 filmed, while they were on set, or at some other
14 time?

15 MS. GAROFALO: Objection. Did you mean 01:17:49
16 Ms. Slater -- Slate?

17 MS. ROESER: I said Ms. Slate.

18 MS. GAROFALO: I'm sorry. I thought you
19 said Ms. Blake. I didn't hear you.

20 BY MS. ROESER: 01:18:05

21 Q Do you recall if Ms. Slate told you where
22 she was when Mr. Baldoni commented on her
23 appearance?

24 A I -- I don't remember which location it
25 was, but it was on set in costume prior to filming. 01:18:12

1 Q During a time when -- during a time when 01:18:19
2 no scene was being filmed?

3 A We were not filming.

4 Q Okay.

5 A Yet. 01:18:26

6 Q Did Ms. Slate tell you what the comment
7 about what her appearance was?

8 A It was -- I don't recall if it was that
9 he called her hot or sexy, and I don't recall if it
10 was once or twice. The first time would have been 01:18:40
11 in the flower shop when she was wearing an
12 all-leather jumpsuit, and the second would have been
13 in the karaoke scene. I don't remember what she was
14 wearing that day, and I don't remember which comment
15 was attributed to which. 01:18:59

16 Q But you recall Ms. Slate informing you
17 that Mr. Baldoni had called her hot and sexy?

18 A Or.

19 Q Hot or sexy?

20 A Correct. 01:19:13

21 Q Okay. And you don't recall the
22 specific --

23 A I don't.

24 Q You don't recall what she was wearing at
25 the time? 01:19:18

1 A I don't. 01:19:18

2 Q Did Ms. Slate share with you during that
3 brunch that she felt Mr. Baldoni's comment that she
4 was hot or sexy, was directed to her personally?

5 A I'm not sure I understand the question. 01:19:39

6 Q Did Ms. Slate share with you during
7 brunch that she felt Mr. Baldoni commenting that she
8 was hot or sexy was directed at her rather than her
9 character?

10 A She didn't specify. 01:19:51

11 Q Did you have an understanding one way or
12 another?

13 MS. GAROFALO: Objection.

14 THE WITNESS: I didn't.

15 BY MS. ROESER: 01:19:58

16 Q Did Ms. Slate also share with you that
17 Mr. Baldoni had commented on Ms. Lively's appearance
18 in a similar manner?

19 A She would not give me specifics about
20 what Blake was experiencing, but I believe had 01:20:11
21 encouraged Blake to speak to me directly and that I
22 reach out to Blake.

23 Q Did Ms. Slate suggest to you that she had
24 encouraged Blake to reach out to you about her own
25 concerns with Mr. Baldoni and Mr. Heath? 01:20:34

1 A I believe she did. 01:20:37

2 Q Do you recall how she suggested that?

3 A I don't.

4 Q Do you recall Ms. Slate suggesting

5 somehow that Ms. Lively had also had some 01:20:54

6 uncomfortable experiences with Mr. Baldoni or

7 Mr. Heath?

8 A Yes.

9 Q And that was in the May 29th brunch you

10 had with her? 01:21:06

11 A Correct.

12 Q You also mentioned that Ms. Slate raised

13 concerns about comments by Mr. Heath with regard to

14 her housing situation; is that right?

15 A Yes. 01:21:22

16 Q What do you recall about Mr. Heath's

17 comments regarding Ms. Slate's housing situation?

18 A All I remember -- and I don't even know

19 that I knew the details of what was happening at the

20 time because production and Wayfarer were handling 01:21:34

21 it vis-a-vis the contract. Those were the kinds of

22 conversations that I wasn't a part of on this film.

23 But it was something to the effect of, we gave you

24 more than maybe we normally would have because we

25 prioritized women with families and children because 01:21:53

1 we're good like that, and that made her
2 uncomfortable.

3 Q Did Ms. Slate share why Mr. Heath's
4 comment make her uncomfortable?

5 A No.

6 Q Just that it did make her uncomfortable?

7 A Correct.

8 Q You also mentioned that Ms. Slate raised
9 concerns regarding Mr. Baldoni recording a Zoom
10 meeting with Ms. Slate and Ms. Lively; is that
11 right?

12 A Correct.

13 Q What is your understanding of that event?

14 A I don't know much about it other than it
15 was an initial creative conversation among the three
16 of them.

17 Q Did you -- were you concerned that
18 Mr. Baldoni had recorded a conversation with Blake
19 and Jenny without their consent?

20 A Yeah, I didn't love hearing that.

01:22:44

21 Q Why?

22 A Because a director needs to build a
23 relationship of trust with his actors and/or her
24 actors. And if you're recording someone without
25 their knowledge, it sets you off on the wrong foot.

01:23:01

1 Q Are you aware that in some states it is 01:23:05
2 illegal to record people without their content?

3 MS. GAROFALO: Objection.

4 MR. GLOVER: Objection, form.

5 THE WITNESS: Yes. 01:23:15

6 BY MS. ROESER:

7 Q And would you be okay with your boss
8 recording a conversation with you without informing
9 you in advance?

10 MS. GAROFALO: Objection. 01:23:30

11 THE WITNESS: No.

12 BY MS. ROESER:

13 Q I believe you testified that there were
14 other nonspecific conversations that Ms. Slate
15 raised she was uncomfortable with. 01:23:36

16 Do you recall that?

17 A I think I just covered all of them. I
18 don't remember any further specifics.

19 Q If you'll look back to Exhibit 6, please.

20 At 11:23 a.m., you sent a text to 01:23:51
21 Ms. Giannetti that said:

22 (As read):

23 "Yes, very bad. I think we need to
24 replace our director. And Jamey should
25 not be on set." 01:24:06

1 be comfy/cozy on set." 02:00:08

2 Do you see that?

3 A Yes.

4 Q What do you recall Ms. Lively sharing
5 with regard to that statement?

6 A There was a lot of hugging and touching
7 amidst the Wayfarer team. It's just seemingly sort
8 of how they do business and interact with each
9 other. And it sounds like she was referring to how
10 sometimes the guys would make jokes about how they 02:00:32
11 couldn't do that. But not really that, it would --
12 the joke would be, can't even make eye contact with
13 people anymore.

14 And she used that as an example to say,
15 everything is too comfortable on set. Can we make 02:00:46
16 it more professional?

17 Q In your view, the comment that Ms. Lively
18 raised about Mr. Heath and Mr. Baldoni joking that
19 you can't make eye contact with people anymore, did
20 you view that to undermine and lessen the importance 02:01:43
21 of people wanting to be comfortable in the
22 workplace?

23 MS. GAROFALO: Objection.

24 THE WITNESS: Yes.

1 THE WITNESS: I wouldn't say 02:32:52

2 inappropriate.

3 BY MS. ROESER:

4 Q You mentioned earlier something about
5 Book Bonanza; is that right?

6 A Yes.

7 Q Did you attend Book Bonanza in June or
8 July of 2023?

9 A I did.

10 Q What is Book Bonanza? 02:33:19

11 A It was a convention for Colleen Hoover's
12 fans and, I think, other BookTok authors.

13 Q Where is it located?

14 A Around Dallas, Texas.

15 Q Who else attended Book Bonanza in 02:33:38
16 connection with It Ends with Us?

17 A Blake attended, some of the executives
18 from the publicity side of Sony, Colleen, Brandon,
19 and I think Isabella.

20 MS. ROESER: Let me introduce -- I'm 02:33:54
21 handing you what will be Exhibits 10 through 13.

22 THE WITNESS: Okay.

23 MS. ROESER: And we'll just start with
24 10.

25 (Exhibit 10 marked for identification.)

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1 (Exhibit 11 marked for identification.) 02:34:20
2 (Exhibit 12 marked for identification.)
3 (Exhibit 13 marked for identification.)
4 BY MS. ROESER:
5 Q Exhibit 10 is a document Bates-stamped 10:15:44
6 SPE_WF150. Do you have that in front of you?
7 A Yes.
8 Q Do you recognize --
9 MS. GAROFALO: I'm sorry. Can you wait
10 until we get the exhibits? 02:34:34
11 Which one?
12 BY MS. ROESER:
13 Q Do you recognize Exhibit 10 as a text
14 exchange between you and Ms. Giannetti, dated
15 June 14th, 2024? 02:34:51
16 A Yes.
17 Q If you'll turn your attention, please, to
18 the text at 8:44 a.m. You write to Ms. Giannetti:
19 (As read):
20 "Colleen wouldn't say JB's name until 02:35:04
21 the ET guy asked. Neither of them
22 would."
23 A Yes, I see that.
24 Q Are you referencing here that Ms. Hoover,
25 the author of It Ends with Us, would not even say 02:35:20

1 Mr. Baldoni's name at Book Bonanza? 02:35:24
2 A Correct.
3 Q Did you have an understanding why
4 Ms. Hoover would not say Mr. Baldoni's name at Book
5 Bonanza? 02:35:34
6 A I believe, at that point, I was aware
7 that Blake and Colleen had discussed basically all
8 of what had happened to Blake on the film.
9 Q Your understanding was that Ms. Lively
10 had discussed with Ms. Hoover how she had been 02:35:55
11 treated by Mr. Baldoni and Mr. Heath on the film?
12 A Correct.
13 Q And her discomfort with that treatment?
14 A Yes.
15 Q At 8:44, when you say: "Neither of them 02:36:07
16 would" mention JB's name, who else were you
17 referring to other than Ms. Hoover?
18 A I -- I assume Blake.
19 Q Is it your recollection that Ms. Lively
20 also would not say Mr. Baldoni's name at Book 02:36:28
21 Bonanza?
22 A Yes.
23 Q If you would turn to Exhibit 11, which is
24 document stamped SPE_BL2193.
25 Do you have that in front of you? 02:36:40

1 A Yes. 02:36:43

2 Q Do you recognize Exhibit 11 as a text

3 exchange between you and Ms. Giannetti, on

4 June 15th, 2024?

5 A Yes. 02:36:52

6 Q At 2:19 p.m., Ms. Giannetti says "call

7 me." And later on, at 2:53, you write -- she asked

8 you:

9 (As read):

10 "Did you get any details back then?" 02:37:07

11 And you respond:

12 (As read):

13 "Justin was very dismissive of her when

14 she wanted to direct and then used

15 Jamey to try and manipulate her when he 02:37:18

16 realized she could co-direct it after

17 she got daddio going."

18 Do you see that?

19 A Yes.

20 Q Do you recall what this text was in 02:37:27

21 reference to?

22 A No.

23 Q Do you recall if you and Ms. Giannetti

24 had a conversation about concerns raised by

25 Christy Hall with respect to Mr. Baldoni being 02:37:37

1 A Absolutely. 03:43:09

2 MS. ROESER: Objection.

3 BY MS. GAROFALO:

4 Q And Mr. Baldoni, throughout the shooting, 03:43:12

5 did he make efforts, from your perception, to keep

6 Ms. Lively happy?

7 A Yes. He usually had a stronger initial

8 reaction to doing so, understandably, but eventually

9 he would get there.

10 Q Why was it understandable? 03:43:26

11 A Because he's the director so he has a

12 more of a creative attachment than the producers do.

13 Q Okay. We talked about the film being

14 shot in two phases, before the Writers Guild SAG

15 strikes and after. 03:43:45

16 Do you recall that?

17 A Yes.

18 Q When you -- and -- well, and you talked

19 about conduct that you did not deem appropriate.

20 Do you remember that? 03:43:55

21 A Yes.

22 Q If you can, did that conduct all occur

23 during what we've been calling the first phase of

24 filming, before the break for the strikes?

25 MS. ROESER: Objection. 03:44:09

1 THE WITNESS: I would say the bulk of it, 03:44:10
2 yes.

3 BY MS. GAROFALO:

4 Q Okay. Now, Ms. Lively had a number of
5 complaints about how the production was being 03:44:29
6 handled almost from day one. Is that consistent
7 with your recollection?

8 MS. ROESER: Objection.

9 THE WITNESS: Yes.

10 BY MS. GAROFALO: 03:44:36

11 Q She complained about the wardrobe; is
12 that right?

13 MS. ROESER: Objection.

19 BY MS. GAROFALO:

20 Q Okay. But she made her feelings known 03:44:53
21 about the wardrobe?

22 MS. ROESER: Objection.

1 A No. 03:48:02
2 Q Why not?
3 A Because I spoke to Jamey, Justin, and
4 Ange directly.
5 Q And do you believe that as the producer, 03:48:08
6 that relieved you of any obligation to ensure that
7 conduct on the set was appropriate?
8 A Yes.
9 MS. ROESER: Objection.
10 MS. CATERINA: Objection. 03:48:19
11 BY MS. GAROFALO:
12 Q You did?
13 A Yes.
14 Q Okay.
15 I want to just ask you briefly about an 03:48:23
16 intimacy coordinator. Was there one?
17 A Yes.
18 Q And was the intimacy -- when was the
19 intimacy coordinator retained, hired, engaged?
20 A So we, actually, I believe, ended up 03:48:46
21 having more than one. And then, there was also one
22 who sort of oversee'd other people that ended up
23 actually being on the set. We engaged with someone
24 in the first round of prep to start preplanning
25 these scenes. To choreograph them, to do 03:49:03

1 conversations with Blake and Justin and the ADs and 03:49:05
2 the intimacy coordinator.

3 Most of those did not happen. And then, 03:49:17
4 as time got closer to those intimate scenes, we --
5 intimacy scenes, we continued to try. But
6 ultimately, on the first round of filming, we didn't
7 shoot any of them.

8 Q Okay. So the first, phase one of 03:49:30
9 shooting before you took a break for the strikes,
10 there were -- in your view, there were no scenes
11 that required an intimacy coordinator; is that
12 correct?

13 MS. ROESER: Objection.

14 THE WITNESS: From my recollection, yes.

15 BY MS. GAROFALO: 03:49:39

16 Q Okay. And in the second phase, there
17 were scenes that required an intimacy coordinator;
18 is that correct?

19 A Yes.

20 Q And in those scenes that you deemed 03:49:48
21 required an intimacy coordinator, was there an
22 intimacy coordinator on the set?

23 MS. ROESER: Objection.

24 THE WITNESS: For the second round, yes.

25

1 the -- I found the story itself to be very 04:17:27
2 compelling, and I finished the book in about three
3 hours. And that, to me, is usually a sign of
4 wanting to do something.

5 Q Okay. So when you accepted the job as a 04:17:38
6 producer on the movie --

7 A Yes.

8 Q -- you knew the movie had -- was to have
9 graphic sexual content; is that correct?

10 MS. ROESER: Objection. 04:17:47

11 THE WITNESS: Well, I had read the script
12 at that point and, obviously, had talked to Justin
13 about the vision. And the way we always talked
14 about it was that it would be quite tasteful. I
15 mean, we were depicting domestic violence, abuse, 04:17:58
16 but the intention was always for it to be beautiful
17 and -- and well-shot and, you know, all of the
18 things.

19 BY MS. GAROFALO:

20 Q But you can have sexual content that's 04:18:13
21 tasteful, well-shot, beautiful?

22 A Absolutely.

23 Q Okay. And in this case, as directed by
24 Mr. Baldoni, were the scenes with sexual content, in
25 your professional opinion, tasteful, beautiful, 04:18:28