

Exhibit 58

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, a
Delaware Limited
Liability Company,
JUSTIN BALDONI, an
individual, JAMEY HEATH,
an individual, STEVE
SAROWITZ, an individual,
IT ENDS WITH US MOVIE
LLC, a California
Limited Liability
Company, MELISSA NATHAN,
an individual, THE
AGENCY GROUP PR LLC, a
Delaware Limited
Liability Company,
JENNIFER ABEL, an
individual, JED WALLACE,
an individual, and
STREET RELATIONS INC., a
California Corporation

Civ. Action No.

1:24-cv-10049-LJL

(Consolidated for
pretrial purposes with

1:25-cv-00449-LJL)

Rel. 1:25-cv-00779-LJL

Defendants.

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Videotaped Deposition of ELIZABETH TALBOT

New York, New York

Thursday, August 21st, 2025

9:31 A.M.

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

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Reported Stenographically By: Anita M. Trombetta,
RMR, CRR, California CSR No. 14647

1 the more time you have to discuss.

2 And I believe I had a conversation with
3 Justin's assistant, who added in Blake's
4 assistant, and that's how we navigated the time
5 for the call.

6 Q Okay. So at some point in early May you
7 had a phone call with Blake Lively?

8 A Correct.

9 Q Okay. Was anyone else on the call?

10 A Yes.

11 Q Who was that?

12 A Lindsey.

13 Q Who is that?

14 A A lawyer for Blake.

15 Q Do you know her last name?

16 A Strasberg, I believe, or something to that
17 effect.

18 Q And do you recall what was discussed
19 during that call?

20 A Yes. I started on the phone with Lindsey.
21 We had a conversation because I think she
22 recognized me and I potentially recognized her
23 from another project, either we had worked with
24 the same actor or -- there was some familiarity
25 between us.

1 So we were on the call together first and
2 then Blake joined. We discussed Wrexham Football
3 Club because I grew up in Wales.

4 And then we started to discuss what my
5 role was because she had not worked with an
6 intimacy coordinator before.

7 She described some previous scenes in her
8 career where she had felt unsafe. And I then
9 asked.

10 ATTORNEY HERMAN: Comfort level, her
11 boundaries, and said that I was going to send her
12 Justin's vision and the -- ask for those scenes
13 that would be within her consent and boundaries.
14 And that I was going to remove anything that was
15 not, and that I was going to provide her with
16 nudity rider language. And to contact me if she
17 needed or wanted anything else.

18 Q Did she ever contact you to say she needed
19 or wanted anything else?

20 A No.

21 Q When she referred to feeling unsafe in
22 scenes on other projects or prior projects, did
23 she specify what those projects were?

24 A No.

25 Q Did she specify why she felt unsafe?

1 ATTORNEY HAGGERTY: Just to make sure to
2 let Mr. Fritz finish his question --

3 THE WITNESS: Sorry.

4 ATTORNEY HAGGERTY: -- before you answer.

5 Q Is the birth scene one of these five here?

6 A No, it is not.

7 Q Have you seen the movie?

8 A Yes.

9 Q Okay.

10 A Oh, this movie?

11 Q This movie, It Ends With Us?

12 A Not in its entirety; pieces of it.

13 Q Okay. Have you seen the birthing scene?

14 A I have seen the birthing scene.

15 Q Do you recall any nudity in that?

16 ATTORNEY ROESER: Objection.

17 Q If you recall?

18 A I don't recall any nudity. There was a
19 high hip line that may have been called profile
20 nudity to an extent, and that some actors would
21 require or request a nudity rider for.

22 Q Do you know if Blake requested that?

23 A No, this was not on our discussion.

24 ATTORNEY FRITZ: Let's take a look at 11
25 quickly.

1 Q And did the filming stop at some point?

2 A Yes, I believe -- so the strike was on at
3 the time, and that was very confusing for many
4 productions that were attempting to film at that
5 time.

6 With this show, I believe -- I think it
7 stopped around the 1st of -- early -- early June,
8 I think.

9 Q Of 2023?

10 A Sorry, 2023, yeah. And then picked back
11 up again, like, middle of June maybe, maybe a
12 couple -- maybe a little bit after that.

13 And then it went down again with the
14 strike and then went back up again in early
15 January.

16 Q Of 2024?

17 A 2024, yes.

18 Q Okay. Were any intimate scenes involving
19 Blake filmed in 2023?

20 ATTORNEY ROESER: Objection.

21 ATTORNEY HAGGERTY: Objection to form.

22 Q If you know?

23 A As far as I am aware, there were no scenes
24 requiring a rider as discussed with Blake in 2023.

25 Q Did you consult with Justin about a sex

1 A I think so.

2 Q Okay. And what did you discuss with her,
3 if you recall?

4 A We discussed the addition of the scene,
5 what her comfort level would be, and we also
6 discussed what nudity rider language that might
7 look like.

8 And my explanation to her, as is with any
9 actor, is that this is a ceiling, it's not a
10 floor. We can go up to, but not over that.

11 I also expressly confirmed with her, from
12 my side, that there would be no nudity during the
13 scene.

14 Q Okay. And was that scene eventually
15 filmed?

16 A Correct.

17 Q Were you on set for that?

18 A Yes, I was.

19 Q Was Blake Lively on set for that?

20 A No.

21 Q Do you know one way or the other whether
22 Isabela was satisfied with the way that young
23 Lily's sex scene was filmed and handled?

24 ATTORNEY ROESER: Objection. Foundation.
25 And form.

1 Q So fair to define nudity to include
2 partial nudity where a particular part of the body
3 is exposed, but not necessarily everything?

4 ATTORNEY HAGGERTY: Objection to the form.

5 A Mm-hmm.

6 Q Is that fair?

7 A So we define "nudity" as anything that
8 would be seen underneath a bikini or a pair of
9 Speedos. One of the most effective ways of doing
10 this is to divide the body up into four parts. So
11 that typically is above the waist, below the
12 waist, front, and rear.

13 So if we were talking about exposing a
14 performer's buttocks, we might talk about actor
15 consents to perform rear nudity below the waist,
16 including buttocks.

17 Q And when you say "we define nudity," who
18 is the "we" that you refer to there?

19 A So SAG has the parameters of nudity as the
20 bikini and Speedos.

21 We, as intimacy coordinators, do try and
22 specify that in a bit more of a form because one
23 of the slightly problematic things that we
24 continually run into is that there are many
25 different types of bikini, and that is something

1 that we consistently run into as an issue.

2 Q And on occasion, is partial nudity also
3 includes something that would be visible
4 underneath a one-piece bathing suit?

5 A No, it's typically defined as a bikini.

6 Q Okay.

7 A For example, like, if someone is wearing a
8 crop top in a scene, that would not be defined as
9 nudity.

10 Q And nudity would also include depicted
11 nudity? So, for example, it would be fair to
12 define it as an actor is not physically nude
13 during filming, but is portrayed to be nude on
14 film?

15 A Actually, no. So implied nudity is
16 something that we don't typically do a rider for.
17 And that's consistent with the format from HBO,
18 where a lot of this work stemmed from.

19 Q And what do you mean when you say "implied
20 nudity"?

21 A So implied nudity, for example, this is a
22 scene I did recently. It is if you imagine an
23 actor looking in the mirror and they are supposed
24 to be looking at their naked body, but we are only
25 shooting from the collarbone up, so they are

1 actually in a tube top and sweatpants. We would
2 not just describe that as nude on camera because
3 we are not seeing, like, nipples, genitalia, and
4 buttocks.

5 Q And what about "inferred nudity"?

6 A Implied and inferred nudity would probably
7 be the same thing. So really it's about what the
8 camera sees, not what the camera doesn't see. So,
9 for example, if someone -- we have this a lot
10 where someone might be under sheets, and, say,
11 they are wearing, like -- because they could be
12 wearing sweat shorts and again a tube top under
13 sheets, they are not nude. It's implied nude, but
14 the camera is not capturing anything that would,
15 in that instance, require a nudity rider.

16 There are occasions where actors say, I
17 would like a nudity rider for implied nudity, but
18 typically it will get kicked back by legal because
19 it does not follow the form from SAG-AFTRA of the
20 nudity that's on the bikini.

21 Q And in your experience, this would have
22 been depicted or implied nudity, should that the
23 be handled with the same sort of sensitivity as
24 full or partial nudity, even if it doesn't require
25 a rider?

1 been a phone call to SAG straightaway.

2 Q But you considered that it might be a
3 possibility that he would attempt to add
4 additional sexual content to the scene?

5 A It was possible.

6 Q And are aware if Isabela and Alex had
7 executed nudity riders in effect at the time of
8 the scene?

9 A They both had nudity riders that were sent
10 to their agents, I believe.

11 Q Do you know --

12 A Sorry.

13 ATTORNEY HAGGERTY: Were you done? Were
14 you done answering the question?

15 THE WITNESS: I think so.

16 ATTORNEY HAGGERTY: Okay.

17 Q Do you know if -- if they had executed the
18 nudity riders at that time?

19 A By that scene, I don't know. I think one
20 of the actors was going to sign on set.

21 And again, as long as they sign before we
22 shoot the scene -- so they can sign on set right
23 before we shoot the scene. It doesn't have to be,
24 like, at the beginning of the day, because again,
25 that's our 48 hours. That's where our 48 hours

1 kicks in.

2 Q Turn to the page with the Bates ending
3 in 3614, please.

4 In this exchange, Mr. Lambert asks you if
5 you spoke to Justin, and you respond, "Yeah, just
6 hand on throat and one on leg."

7 Do you see that?

8 A Correct.

9 Q What was that in reference to?

10 A That was in reference to the action with
11 the parents of Lily Bloom.

12 Q Okay.

13 A And originally that was going to be a,
14 like, a slightly more explicit scene, but that got
15 downgraded to a very simple action. So again, no
16 nudity rider required for that; it's just standard
17 choreography.

18 Q If you could turn back, please, to
19 Exhibit 14 that was introduced by defendants'
20 counsel this morning. It's a document
21 ending 3471.

22 ATTORNEY HAGGERTY: Sorry, which --

23 THE WITNESS: Which one?

24 ATTORNEY ROESER: It's a text exchange on
25 May 8th, 2023.