

Exhibit 12

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14 WAYFARER STUDIOS LLC, et al.
15 vs.
16 BLAKE LIVELY, et al.
17
18 Consolidated Plaintiffs,
19
20 Consolidated Defendants.

19 VIDEO-RECORDED DEPOSITION OF ANDREA GIANNETTI
20 Culver City, California
21 Tuesday, September 23, 2025
22
23 Stenographically Reported by: Ashley Soevyn,
 CALIFORNIA CSB No. 12019

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1 (Exhibit 12 marked for identification.)

2 THE WITNESS: Thank you.

3 BY MS. HUDSON:

4 Q Exhibit 12 is a text chain between
5 Ms. Lively and Ms. Giannetti dated May 25th
6 through May 26th, 2023, BL7953.

7 Ms. Giannetti, do you recognize this text
8 chain?

9 A Yes.

10 Q And you recognize this as a text chain
11 between you and Ms. Lively?

12 A Correct.

13 Q In the second entry here from Ms. Lively
14 at the end of the sentence, she says:

15 (As read):

16 "But let's attach up in general"?

17 A Uh-huh.

18 Q And then you say:

19 (As read):

20 "I can make any time tomorrow work."

21 Do you see that?

22 A I do.

23 Q And it looks like you play a little phone
24 tag with her for a document; is that right?

25 A It looks like it.

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1 Q And then at the end, you say:

2 (As read):

3 "I will say what I did want to
4 review/discuss feels very, very small
5 in light of today's news. I'm so
6 sorry. Calling you in moments."

7 Do you see that?

8 A I do.

9 Q Did you call Ms. Lively on this day?

10 A I can't recall but most likely.

11 Q And the day is May 26th, right?

12 Correct?

13 A I see -- I see that on the -- I see that
14 on the -- on the printout, yeah.

15 Q And do you recall what it was that you
16 wanted to review and discuss with Ms. Lively?

17 A I think it was wardrobe.

18 Q And you say that:

19 (As read):

20 "In light of today's news, that seems
21 very, very small."

22 Right?

23 A That's what I wrote, yes.

24 Q What was "today's news"; do you recall?

25 A I believe it was that she had been

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1 exposed to COVID and was worried that the baby might
2 have COVID.

3 Q And how did you learn that?

4 A I don't remember where I learned it
5 first.

6 Q Did you talk with Ms. -- did Ms. Lively
7 tell you that herself?

8 A Yes. We definitely talked about it.

9 Q Did you talk about it before this call?

10 A I don't remember.

11 Q And you said you think you probably did
12 have a call with her on May 26th, then?

13 A If I said "I'm calling you in moments," I
14 would have called her in moments.

15 Q Sitting here today, do you have a
16 recollection of that phone call?

17 A Exactly, no.

18 Q Do you have a general recollection of it?

19 A I have a general recollection.

20 Q And generally, what do you recall?

21 A I remember -- I mostly remember her being
22 very concerned about the COVID. And if I'm correct,
23 I -- I don't know if it was before or after. I'm
24 not great with the timing. But I recall that she
25 had been in the hospital, and the baby had been in

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1 the hospital with RSV. And so this -- you know,
2 this -- that potentially the baby would have COVID.
3 As a mother, that was concern- -- you know, very
4 concerning.

5 Q The phone call, do you recall whether it
6 was just you and Ms. Lively on that phone call?

7 A I think it was just the two of us on the
8 phone call.

9 Q Do you recall how long it lasted?

10 A No.

11 Q Do you recall anything else about the
12 phone call, other than what you described?

13 A Specifically, on this call, I can't -- I
14 know there were many things we were talking about at
15 this time, but I couldn't say for sure exactly.
16 Yeah, I don't -- you know.

17 Q And where were you on May 26th? Were
18 you in Los Angeles?

19 A Yeah, I was in Los Angeles.

20 Q And was it your understanding that
21 Ms. Lively was in New York, New Jersey?

22 A New York. I mean if it was at night, she
23 was probably in New York. Or maybe she was on set
24 if it was a night shoot -- I mean in New Jersey, if
25 it was a night shoot.

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1 A The example she gave over and over again
2 were about the first AD and about scheduling and the
3 time that she would be called in and the hair and
4 makeup and -- and -- that a lot of the reasons if
5 there was lateness on that day, it was the first
6 AD's fault.

7 Q Anything else that you recall Ms. Lively
8 reporting to you in the category of "too loose"?

9 A No.

10 Q So have you now told me about all of the
11 things that you recall Ms. Lively complaining about
12 to you about Mr. Baldoni?

13 A That I can recall in this moment, yes.

14 Q Going back to Mr. Heath. You said there
15 was a issue regarding the showing of the birth of
16 his child?

17 A Uh-huh.

18 Q Tell me what you recall about that?

19 A I was on set. I was not there -- I was
20 not present when it happened, even though I was on
21 set. I believe Jamey came to me first and said he
22 showed the video; Justin asked him to show the
23 video. And she was surprised and did not -- I don't
24 know how he said -- she didn't take it well.

25 Q Did Mr. Heath describe what he had shown

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1 Ms. Lively?

2 A Did he describe it? No.

3 Q Did -- did you, at some point, talk to
4 Ms. Lively directly about that?

5 A Well, yes. There was an interaction. It
6 was very brief. She was -- I think it was we were
7 at lunch, and she walked by and said -- she
8 mentioned the video and being very unhappy about it.
9 I forgot her exact words. She said it to me and
10 kept walking.

11 Q Did she tell you what she had seen in the
12 video?

13 A She may have. I don't remember what --
14 the phrasing.

15 Q Did she tell you that Mr. Heath's wife
16 was nude in the video?

17 A She may have.

18 Q Did she tell you that when she first saw
19 the video, she didn't know what she was looking at
20 and thought it was pornography?

21 A No, she did not say that.

22 Q Did she tell you that she saw Mr. Heath's
23 wife's genitals in that video?

24 A She did not say that.

25 Q But you do recall her maybe saying that

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1 his wife was nude in the video?

2 A She could have said that, yeah.

3 Q Did she ask you to do anything about it?

4 A She did not.

5 Q Did you think you should do anything
6 about it?

7 A No. I saw the video.

8 Q What did you see?

9 A I saw a woman in a tub giving birth.

10 Q What exactly did you see? Was it -- was
11 she naked?

12 A I knew she was naked. There was water.
13 I don't remember seeing any genitalia.

14 Q Did you -- when you say "giving birth,"
15 did you see a baby crowning?

16 A No. I don't remember that.

17 Q You remember a woman alone in the tub?

18 A No. I think someone's behind her,
19 holding her.

20 Q Do you know whether -- well, let me ask
21 you this: How did -- how did you see the video?

22 A Jamey showed it to me.

23 Q And how do you know that the video you
24 saw was the same video that Ms. Lively saw?

25 A I don't.

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1 Q Did you think the video that Mr. Heath
2 showed you with his nude wife in the tub was an
3 appropriate thing to show in a workplace?

4 MR. FREEDMAN: Objection.

5 THE WITNESS: No.

6 BY MS. HUDSON:

7 Q And why not?

8 A Well, can I -- they -- it was my
9 understanding they were talking about the birthing
10 scene. It didn't come out of nowhere. They were
11 talking about a birthing scene and so -- wanted to
12 share it. The thing that I think is the
13 inappropriate part is that before showing the video,
14 no one stopped to say "we have a video of my wife
15 giving birth in a tub; would you like to see it?"
16 That -- that should have been done before showing a
17 video.

18 Q So you think they should have gotten
19 consent from Ms. Lively before showing her a video
20 of Mr. Heath's naked wife in a tub?

21 MR. FREEDMAN: Objection.

22 THE WITNESS: That would have been a
23 smart thing to do, yes.

24 BY MS. HUDSON:

25 Q And did you understand how Ms. Lively

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1 might have been uncomfortable seeing that video, not
2 anticipating and giving consent in advance?

3 A Yes.

4 Q Other than learning about the video from
5 Ms. Lively and Mr. Heath, is there anything else
6 that occurred with -- from your end with respect to
7 that video?

8 A I don't think so, no.

9 Q Did you tell Mr. Heath not to do things
10 like that?

11 A I think I did.

12 Q Did you tell anyone in human resources at
13 Wayfarer that Mr. Heath had shown Ms. Lively a video
14 of his wife nude in a tub giving birth?

15 MR. FREEDMAN: Objection.

16 THE WITNESS: No.

17 BY MS. HUDSON:

18 Q And you didn't think that was important
19 to do?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: I thought it was a
22 misunderstanding. I thought Jamey -- I believed
23 Jamey when he said Justin told him to show the video
24 because they were discussing the birthing scene.
25 And I believe when Jamey showed her the video, it

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1 had been prepped, and that was -- so I believe the
2 intention -- I believed it was a mistake.

3 Q When did you see the video?

4 A I can't remember. I think it might have
5 been after. I think -- I can't tell you that I
6 really know.

7 Q Now, you mentioned that -- a trailer
8 incident.

9 A Yeah.

10 Q What happened there?

11 A I was told Jamey had to discuss something
12 with Ms. Lively. He knocked on the door. He told
13 me he heard "come in." He went in. And then I
14 heard that Ms. Lively did not say "come in" so was
15 surprised he came in. Then I believe -- I could be
16 wrong about this -- but I believe she then was
17 like -- I don't know if she was getting body makeup
18 removed or breast feed- -- I don't remember what was
19 happening. But then I think she said he could stay.

20 Anyway, it was definitely a
21 miscommunication, and she made it very clear that
22 she was uncomfortable. I felt this fell into the
23 "loose" -- it was a "loose set." And she wanted --
24 and she wanted to have a meeting about it. And we
25 did at the end of the day in her trailer.

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1 A No. I would have remembered that.

2 Q Okay. So having -- do you recall whether
3 you -- Ms. Lively asked you to do anything about
4 these various issues she was raising to you at the
5 time, including May 26th?

6 A Yes. She asked me for help in getting
7 rid of the first AD.

8 Q Did -- she didn't ask for anything else?

9 A No.

10 Q Did she tell you that she wanted to file
11 an HR complaint?

12 A She did not. Oh. She may have over
13 COVID.

14 Q So you recall her telling you that she
15 wanted to file an HR complaint with Sony?

16 A I recall that, actually, in person, not
17 on the phone.

18 Q So there was a time in person she told
19 you she wanted to file an HR complaint with Sony?

20 A She didn't use the words "H" -- I don't
21 remember her using the words "HR." She was very
22 upset about the COVID and did not think the COVID
23 protocols were being followed. And she wanted to
24 have Sony get into it. And I said, "We don't run
25 the movie." The way protocols are done are with

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1 Q Did you help replace the first AD?

2 A Yes, I did.

3 Q And do you know whether anyone else
4 thought that there was a problem with the first AD?

5 A I think Alex Saks thought there was a
6 problem with the first AD.

7 Q Did anyone else speak with you about
8 concerns they had with Mr. Baldoni or Mr. Heath?

9 A Define "concern." There is a lot of
10 complaining on a set. There is a lot of
11 personalities. Yeah, I think Alex -- probably Alex
12 Saks.

13 Q Did Jenny Slate?

14 A Yes, Jenny Slate. Yes, the "sexy"
15 comment.

16 Q Did Jenny Slate's manager?

17 A I will tell you about the conversation
18 with Jenny Slate's manager. Jenny Slate's manager
19 called me and, in a very general way, asked me,
20 like, "What's going on, on that set?" She didn't
21 get into anything specific. She just said, "What's
22 going on?" And -- and she intimated Jenny and --
23 and Blake had concern. She didn't know really what
24 it was. And I -- and I just said to the manager,
25 "Have Jenny call me. She can call me directly.

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1 | done. "

2 Is that what Ms. Lively told you?

3 A I don't recall.

4 Q But you don't have any reason to dispute
5 Ms. Lively's account?

6 A No.

7 Q And you mentioned that Alex had some --
8 Alex Saks had concerns. What were those?

9 A Alex Saks's main concern is that she felt
10 sidelined. She was used to running her own shows,
11 producing her own shows. She was brought on this,
12 and she felt like it was not her set to run, was the
13 main one, as far as I know.

14 Lacaab. I got that wrong.

15 Q Do you want to correct something?

16 A Yeah. I thought -- I thought Justin had
17 said she looked sexy. And it says here:

18 (As read):

19 "You were standing there for the thing,
20 and he said to me, he said, 'I look
21 hot.'"

22 Q Who is -- who is that that you're reading
23 from?

24 A Jenny.

25 Q Jenny.

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1 A I got a quote that said.

2 Q And did you end up speaking with
3 Ms. Slate?

4 A Yeah, she called.

5 Q And what did -- when did that
6 conversation take place?

7 A I think it was the same night I spoke to
8 the manager. I think.

9 Q Was that May 27th?

10 A Maybe.

11 Q And do you know whether Ms. Slate spoke
12 with Alex Saks as well?

13 A I think she did.

14 Q Going back to your conversation with
15 Ms. Slate, what did she tell you? Before you -- was
16 this a phone call, or was this in person?

17 A It was a phone call.

18 Q It was just the two of you?

19 A Yes.

20 Q And how long did that phone call last?

21 A Not long.

22 Q Okay. And what did Ms. Slate tell you?

23 A In -- in -- in -- what I remember
24 generally, I remember some things generally and some
25 things specifically.

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1 Generally, I remember her having unease
2 on the set, talking about how Blake had great --
3 had -- Blake had a lot of concerns. She shared them
4 with Jenny. Jenny had the experience of the "hot"
5 comment. And it just -- the -- it felt tense. You
6 know, things felt tense on set. She was very --
7 honestly, she was very all over the place and
8 wishy-washy about it a little bit. And I -- the
9 part I really specifically remember is asking her at
10 the end, "Are you asking me to do something?" And
11 she said, "No. My manager said I should call you."

12 Q And you didn't feel, after hearing that
13 both Ms. Slate and Ms. Lively were uncomfortable,
14 that there was something you should do, whether
15 asked or not?

16 A To date, Jenny Slate told me the director
17 told her she looked "hot" in costume. No, I did not
18 think anything from that needed to go to HR. And
19 the majority of Blake's concern -- the majority of
20 them were the running of the set, his inexperience,
21 the first AD, the COVID. And there were these
22 other -- the incident of the video and the trailer.
23 But, no, I did not think there was -- I thought it
24 was a shit show, but I did not think it was...

25 Q Also, Alex Saks felt sidelined as well,

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1 right?

2 MR. FREEDMAN: Objection. Could you let
3 her finish her answer?

4 BY MS. HUDSON:

5 Q I'm sorry. Were you still -- was there
6 more you were saying?

7 A I thought it was a shit show, and there
8 was -- those incidents alone were not reason to call
9 HR for a movie that we were cofinancing and
10 distributing.

11 Q How many women on a set have to be
12 uncomfortable before you think it rises to the level
13 of calling HR?

14 MR. FREEDMAN: Objection.

15 THE WITNESS: They didn't like him.

16 BY MS. HUDSON:

17 Q What do you mean by that?

18 A They didn't like him.

19 Q So you discounted their views on him?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: I heard of three incidents.
22 You can ask me this a hundred times, I'm going to
23 tell you the three incidents I know over and over
24 again.

25 The video, I saw the video. The trailer,

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1 we had a meeting in the trailer. It was resolved.
2 And the director called Jenny Slate "hot" in front
3 of 300 people on set. Those were the three
4 incidents. No, I did not think there was reason to
5 call HR.

6 MS. HUDSON: Okay. Let's take a look at
7 Exhibit 16. This is a text chain between Alex Saks
8 and Ange Giannetti dated May 29th, 2023,
9 Bates-stamped SPEBL2023.

10 (Exhibit 16 marked for identification.)

11 BY MS. HUDSON:

12 Q Do you recognize this as a text chain
13 between you and Ms. Saks?

14 A I do.

15 Q Okay. If you go to the beginning, Ms. --
16 you say to Ms. Saks:

17 (As read) :

18 "Call you when" -- "call when you can,
19 xx."

20 Do you see that?

21 A I do.

22 Q And Ms. Saks says:

23 (As read) :

24 "Finishing up brunch with Jenny."

25 Do you see that?

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1 Alex Saks dated June 1st, 2023, SPEBL2026.

2 Is this a -- do you recognize this as a
3 text chain between you and Ms. Saks?

4 A I do.

5 Q And in this text chain, is Ms. --
6 Ms. Saks reporting to you about a meeting that she
7 had with Ms. Lively, Mr. Heath, and Mr. Baldoni?

8 A I need a minute to read it.

9 Q Sure.

10 I'm going to go to this and ask you
11 specific questions.

12 A Okay.

13 Q Okay? The -- at 9:35 a.m., Ms. Saks says
14 "We had a very good tough chat with Blake. She was
15 eloquent and on point. Called Jamey out in front of
16 me and Justin kindly but was very direct. It was
17 impressive to watch."

18 Do you see that?

19 A I do.

20 Q Okay. So does this refresh your
21 recollection that Ms. Lively -- that Ms. Saks told
22 you about a meeting with her, Ms. Lively,
23 Mr. Baldoni, and Mr. Heath?

24 A It doesn't refresh it, but I -- I see
25 that it happened.

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Yeah, I mean -- yeah, it
3 says here there will be one, but I did not -- I
4 didn't remember that we had to have it, and I didn't
5 know that it was scheduled at the end --

6 BY MS. HUDSON:

7 Q When did production start?

8 A January 5th.

9 Q Okay. And when was the meeting?

10 A January 4th.

11 Q Okay. And at the January 4th
12 meeting...

13 MS. HUDSON: I'm going to hand you
14 another document.

15 THE WITNESS: Okay.

16 THE STENOGRAPHIC REPORTER: Exhibit 20
17 for the record.

18 (Exhibit 20 marked for identification.)

19 MS. HUDSON: Okay.

20 MR. FREEDMAN: Time check?

21 THE VIDEOGRAPHER: Three hours, thirteen
22 minutes.

23 THE WITNESS: Thank you.

24 BY MS. HUDSON:

25 Q Ms. Giannetti, this is Ms. Lively's

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1 Q And that was known from early on; is that
2 correct?

3 A Yeah, it was going to be a very fine line
4 to walk.

5 Q And you, at that time, thought if you
6 were just true to the book, then the movie would be
7 successful; is that correct?

8 MS. HUDSON: Objection.

9 THE WITNESS: Yes.

10 BY MR. FREEDMAN:

11 Q And the book involved sexuality, correct?

12 A Correct.

13 Q In the book, the characters had sex,
14 correct?

15 A Correct.

16 Q And the characters were supposed to have
17 sexual chemistry in the book, right?

18 A Correct.

19 Q And the book contained detailed sex
20 scenes; is that correct?

21 A Correct.

22 Q The book also concerned violence,
23 correct?

24 A Correct.

25 Q Domestic violence was described in detail

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1 in the book; isn't that correct?

2 A Yes.

3 MR. FREEDMAN: Let's go to 24.

4 (Exhibit 24 marked for identification.)

5 THE WITNESS: Thank you.

6 BY MR. FREEDMAN:

7 Q Exhibit 24 is a true and correct copy of
8 a text exchange you sent to Jamey Heath, Justin
9 Baldoni, Alex Saks, and Ashley Marks on March 31st,
10 2023. Who is Ashley Marks?

11 A She's the head of casting for Sony.

12 Q And the text message states, from you:

13 (As read):

14 "This process is poor. We spend time
15 discussing and making a decision and
16 then you just do what Blake wants with
17 no regard for your partner."

18 Do you see that?

19 A I do.

20 Q And what was meant by this message?

21 A I don't know what it was regarding
22 specifically, but this sounds like I am really not
23 happy. It sounds like we made a decision and then
24 the decision got reversed, and it sounds like I did
25 not get consulted on that.

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1 Q Very?

2 A Yes.

3 Q Did you think it was inappropriate for
4 Mr. Rothman to say that Blake Lively wasn't as
5 alluring as she needed to be for the movie?

6 A I think Mr. Rothman thought this was a
7 private communication between him, me, and Sanford,
8 and I do not think it's inappropriate.

9 Q Did it make you uncomfortable?

10 A Not at all.

11 Q Did you think this was harassment?

12 A No.

13 Q We already discussed that phase one of
14 the principal photography began on May 15th, 2023,
15 correct?

16 A Correct.

17 Q And the filming took place in New Jersey
18 during phase one, correct?

19 A Correct.

20 Q There were no other locations, correct?

21 A Correct.

22 MS. HUDSON: Objection.

23 BY MR. FREEDMAN:

24 Q And filming was scheduled to occur, in
25 part, in Las Vegas; isn't that correct?

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1 Q Was Ryan Reynolds her manager?

2 A No.

3 Q He was her husband, correct?

4 A Correct.

5 Q Part of what Blake was complaining about
6 in these protections was what she thought was sexist
7 behavior, correct?

8 A I don't know.

9 Q She asked her husband to talk to her
10 studio on a movie in his capacity as her husband,
11 correct?

12 MS. HUDSON: Objection.

13 THE WITNESS: I don't know.

14 BY MR. FREEDMAN:

15 Q Todd Black was hired as the A-list
16 producer, correct?

17 A Correct.

18 Q Did Wayfarer agree to the 17-point list?

19 MS. HUDSON: Objection.

20 THE WITNESS: I don't know the wording,
21 but yes, we -- we agreed to the protections so she
22 would return to work.

23 BY MR. FREEDMAN:

24 Q Did you talk with anyone about why --
25 anyone at Wayfarer about why they agreed to the

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1 17-point list?

2 A No. I knew why.

3 Q Why?

4 MS. HUDSON: Objection.

5 THE WITNESS: Because there was a
6 tremendous amount of money that had been invested
7 and spent, and we had to finish the movie or it was
8 unreleasable.

9 BY MR. FREEDMAN:

10 Q Did Blake Lively threaten to leave the
11 movie if the 17-point list wasn't signed without
12 alteration or revision?

13 MS. HUDSON: Objection.

14 THE WITNESS: That's my understanding.

15 BY MR. FREEDMAN:

16 Q Do you recall telling Jamey Heath that
17 you thought Blake was a fucking terrorist?

18 MS. HUDSON: Objection.

19 THE WITNESS: Yes.

20 BY MR. FREEDMAN:

21 Q At that point in time, how much money had
22 Sony invested in the movie?

23 A Well, I believe the going budget was 28
24 and change, 28 million and change. We had
25 three weeks left -- I -- I -- I'm -- at least

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1 \$20 million, if not more.

2 Q At that point in time, do you know how
3 much money Wayfarer had invested in the movie?

4 A More than half of whatever that number
5 was. It was more than us.

6 Q Did Blake's efforts to rewrite the script
7 increase at that point in time?

8 MS. HUDSON: Objection.

9 THE WITNESS: Increase -- I don't recall.

10 BY MR. FREEDMAN:

11 Q Did she start adding locations, actors,
12 and adding pages?

13 MS. HUDSON: Objection.

14 THE WITNESS: For the -- the final
15 three weeks?

16 BY MR. FREEDMAN:

17 Q Yes.

18 A I'm sure she did. That was -- that was
19 the process from the beginning. Just

20 Q Did her changes vary from the book?

21 MS. HUDSON: Objection.

22 THE WITNESS: I can't recall the
23 specifics.

24 BY MR. FREEDMAN:

25 Q At that point, did you know whether she

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1 BY MR. FREEDMAN:

2 Q Well, her role in the movie continued to
3 grow, correct?

4 MS. HUDSON: Objection.

5 THE WITNESS: In the -- I -- I didn't
6 notice any change.

7 BY MR. FREEDMAN:

8 Q What about editing?

9 A Well, that's post. You're still talking
10 about production. If we're moving to post, it's a
11 whole different ball game.

12 Q Why do you say "it's a whole different
13 ball game" in post?

14 A Because it's a whole different ball game.

15 Q Can you explain to me what you mean by
16 that?

17 A I'm saying I did not notice a -- any
18 distinct change from Blake on the set before strike,
19 after strike, other than she was happier and we did
20 good work. So that felt more consistent.

21 Post was very not consistent.

22 Q Did you understand that a formal HR
23 process had not yet occurred, as stated in the
24 letter with the 17-point list?

25 MS. HUDSON: Objection.

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1 THE WITNESS: I didn't know about any
2 HR -- I never heard about any HR complaints.

3 BY MR. FREEDMAN:

4 Q So that's a yes?

5 A That's a yes.

6 Q Had Blake Lively made an HR complaint to
7 Sony?

8 MS. HUDSON: Objection.

9 THE WITNESS: Not that I know of.

10 BY MR. FREEDMAN:

11 Q Do you have any reason to believe that
12 Blake Lively had filed an HR complaint with
13 Wayfarer?

14 MS. HUDSON: Objection.

15 THE WITNESS: No.

16 BY MR. FREEDMAN:

17 Q When it says that "The complaints of our
18 client and others have been repeatedly conveyed and
19 well documented throughout preproduction and
20 photography," what did you understand that to mean?

21 MS. HUDSON: Objection.

22 THE WITNESS: That -- that she was very
23 vocal about things that she didn't like.

24 BY MR. FREEDMAN:

25 Q I'm -- I'm referring right now to

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1 Exhibit 19.

2 A Okay. So what's the question?

3 Q I direct your attention to 30 -- what's
4 marked 3514 on the bottom.

5 A 3514. Hold on.

6 Uh-huh.

7 Q And it states in the first paragraph, the
8 last line:

9 (As read) :

10 "The complaints of our client and
11 others have been repeatedly conveyed
12 and well documented throughout
13 preproduction and photography."

14 Did -- did you know that to be true?

15 A No.

16 Q Had you seen any documentation of the
17 complaints referred hereto by Ms. Lively?

18 MS. HUDSON: Objection.

19 THE WITNESS: No.

20 BY MR. FREEDMAN:

21 Q Had you seen any of the -- any complaints
22 in writing of anyone else on the set --

23 MS. HUDSON: Objection.

24 BY MR. FREEDMAN:

25 Q -- as of that date?

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1 THE WITNESS: No.

2 BY MR. FREEDMAN:

3 Q Do you know what complaints Lindsey --
4 Lindsey Strasberg was referring to here?

5 MS. HUDSON: Objection.

6 THE WITNESS: No.

7 BY MR. FREEDMAN:

8 Q Was this email and its attachment
9 discussed internally at Sony?

10 A Yes.

11 Q Amongst who?

12 A Myself, Michael Marshall,
13 Sanford Panitch. I was not in rooms with
14 Tom Rothman when it was discussed, but I'm sure they
15 briefed him.

16 Q Okay. What was the conclusion reached at
17 Sony regarding this document?

18 MS. HUDSON: Objection.

19 THE WITNESS: Give her the protections.

20 BY MR. FREEDMAN:

21 Q At some point, did you say, in talking to
22 Wayfarer, Jamey, and Justin, something like,
23 "Listen, we're going to get through this movie.
24 We're going to give her what she wants. We're going
25 to make this film. We're going to get it done

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1 because the only thing that matters is making this
2 film"?

3 MS. HUDSON: Objection.

4 THE WITNESS: Often.

5 BY MR. FREEDMAN:

6 Q Often?

7 A Often.

8 Q At some point, did you discuss -- discuss
9 with Jamey and Justin that Blake Lively's biggest
10 fear is that she will go onto set and not be liked?

11 MS. HUDSON: Objection.

12 THE WITNESS: I -- I don't recall that.

13 BY MR. FREEDMAN:

14 Q Did anyone at Sony discuss this document
15 with Ms. Lively?

16 MS. HUDSON: Objection.

17 THE WITNESS: Not that I know of.

18 BY MR. FREEDMAN:

19 Q Did anyone at Sony discuss this document
20 with Lindsey Strasberg?

21 MS. HUDSON: Objection.

22 THE WITNESS: Not that I know of.

23 BY MR. FREEDMAN:

24 Q Did anyone at Sony discuss this document
25 with David Weber?

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1 MS. HUDSON: Objection.

2 THE WITNESS: I don't know.

3 BY MR. FREEDMAN:

4 Q Do you know who David Weber is?

5 A Yes.

6 Q Did anyone at Sony discuss this document
7 with anyone at Wayfarer?

8 MS. HUDSON: Objection.

9 THE WITNESS: I believe Michael Marshall
10 discussed it with Wayfarer.

11 MR. FREEDMAN: Okay. Take a short break.

12 THE WITNESS: Yeah.

13 THE VIDEOGRAPHER: The time is 6:48 p.m.
14 Off record.

15 (Recess.)

16 THE VIDEOGRAPHER: The time is 7:08 p.m.
17 We're back on record.

18 BY MR. FREEDMAN:

19 Q Good evening now.

20 A Good evening.

21 Q Were you invited to attend a meeting on
22 January 4, 2024 at Blake's apartment?

23 A I believe I asked for that meeting.

24 Q You asked for that meeting?

25 Was that supposed to be the

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1 return-to-work production meeting?

2 A I thought it was a script meeting.

3 Q Did anyone tell you before what you were
4 walking into?

5 MS. HUDSON: Objection.

6 THE WITNESS: No. But Blake did say,
7 when we confirmed time and the place, that she --
8 you know, she wanted to do a clearing of the air at
9 the beginning. And I was like, great.

10 BY MR. FREEDMAN:

11 Q Were you surprised by what you heard at
12 the meeting?

13 A Very.

14 Q What surprised you about it?

15 A Many things surprised me. I was
16 surprised at the beginning that Ryan was joining the
17 meeting because I thought we were going to be
18 talking about the script and the schedule.

19 And then they asked for the line producer
20 to leave because we had had the -- was it the line
21 producer or the -- I don't know. We had someone
22 technical from the set to leave. Which was fine.

23 And then -- and then she proceeded to
24 read a list of things. It -- it was a pretty
25 shocking list.

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1 Q Why was it shocking?

2 A I had not heard the majority of the
3 things on the list. And I -- I didn't know that --
4 I just -- I wasn't prepared for that was the kind of
5 meeting we were having.

6 Q And isn't it true that you heard things
7 that were prefaced with "no more this" or "no more
8 that"?

9 A I think so. Yes.

10 Q And did that surprise you also?

11 MS. HUDSON: Objection.

12 THE WITNESS: That specifically, I don't
13 remember focusing on. The -- the content, to me,
14 was more surprising.

15 BY MR. FREEDMAN:

16 Q And was anybody addressing Justin
17 directly?

18 A Yeah. I mean, it was to the room, but
19 yeah, I think it was mostly to Justin.

20 Q Was Ryan Reynolds yelling at Justin?

21 A It was a very long meeting. And there
22 were times, yes, his voice was raised.

23 Q Did you feel bad for Justin?

24 MS. HUDSON: Objection.

25 THE WITNESS: Yes.

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1 BY MR. FREEDMAN:

2 Q Why?

3 A I -- I think it went over five hours.

4 And he -- he was visibly frozen.

5 Q Who was invited to the meeting?

6 A Myself, Justin, Jamey, Alex Saks,
7 Todd Black, and I think it was the first AD or the
8 line -- I can't -- I can't remember.

9 Q Did Todd Black talk to you about his
10 reaction to the meeting?

11 A At length.

12 Q Did he tell you it was the -- one of the
13 harshest meetings he had ever been to in his entire
14 career?

15 A He did.

16 Q What did he say about that?

17 A It was -- it was the fact that we were
18 not prepared for such that -- that we thought
19 something else was going to occur and the length of
20 the meeting. And that there -- there was -- I -- I
21 don't even think there was a break. It just -- we
22 never experienced -- just never experienced that.

23 Q Had you ever experienced that in your
24 illustrious career?

25 MS. HUDSON: Objection.