

Exhibit 75

1
2 ** C O N F I D E N T I A L **
3 * CONTAINS ATTORNEYS' EYES ONLY MATERIAL *
4 UNITED STATES DISTRICT COURT
5 SOUTHERN DISTRICT OF NEW YORK
6 Case No. 1:24-CV-10049-LJL
(Consolidated with 1:25-cv-00449-LJL)
6 -----x
7 BLAKE LIVELY,
8 Plaintiff,
9 - against -
10 WAYFARER STUDIOS LLC, a Delaware
11 Limited Liability Company, JUSTIN
12 BALDONI, an individual, JAMEY HEATH, an
13 individual, STEVE SAROWITZ, an individual,
14 IT ENDS WITH US MOVIE LLC, a California
15 Limited Liability Company, MELISSA
16 NATHAN, an individual, THE AGENCY
17 GROUP PR LLC, a Delaware Limited Liability
18 Company, JENNIFER ABEL, an individual,
19 JED WALLACE, an individual, and STREET
20 RELATIONS INC., a California Corporation,
21 Defendants.
22 -----x
23 (Caption continued)
24 September 30, 2025
25 10:09 a.m.

17
18 Videotaped Deposition of ISABELA
19 FERRER, taken by Defendants, pursuant to
20 Subpoena, held at the offices of Meister
21 Seelig & Fein PLLC, 125 Park Avenue, New
22 York, New York, before Todd DeSimone, a
23 Registered Professional Reporter and Notary
24 Public of the State of New York.
25

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2 rehearsals were? I don't need the exact
3 date, but month, year.

4 A. In June 2023, the day before we
5 started filming.

6 Q. And you said it was two
7 rehearsals?

8 A. Yes.

9 Q. How long did the first
10 rehearsal last?

11 A. I would say around an hour, an
12 hour to two hours.

13 Q. Who else was present during
14 that rehearsal?

15 A. The first rehearsal was with
16 the DP, Barry Peterson, Justin Baldoni, and
17 Lizzy, the intimacy coordinator.

18 Q. If I said the last name Talbot,
19 would that refresh your memory?

20 A. Yes.

21 Q. And what is a DP?

22 A. Director of photography.

23 Q. Other than Justin, the director
24 of photography, and Lizzy Talbot and
25 yourself, did anyone else participate in

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2 that first rehearsal?

3 A. Yes, my co-star.

4 Q. And who was that?

5 A. Alex Neustaedter.

6 Q. Did anything occur during that
7 first rehearsal that caused you any concern
8 with any of the defendants?

9 MS. ROESER: Objection.

10 A. No.

11 Q. Then we can move on to
12 rehearsal number two. That was also the
13 day before regular -- filming of the movie
14 started?

15 A. So I'm recalling now that I
16 believe this rehearsal was the day before
17 the second rehearsal. I think they -- they
18 were in two days. So this first intimacy
19 rehearsal was the day before, sorry, I'm
20 repeating myself, the second rehearsal
21 which then was the day before filming. So
22 there were two days of rehearsing put
23 separately.

24 Q. And did the same people
25 participate in this other rehearsal?

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2 wrong or a number wrong, you will have an
3 opportunity to correct that.

4 A. Okay.

5 Q. During those six to seven days
6 in 2023 when you participated in filming,
7 was Blake Lively present?

8 A. The one day in May she was
9 present because she was filming. Outside
10 of that, no.

11 Q. And was Blake Lively present on
12 that one day in February of 2024 when you
13 had to do, was it a reshoot?

14 A. No, but there was a day in
15 January where I did reshoots and she was
16 present.

17 Q. Okay. On the day in May of
18 2023 when Blake Lively was present, how
19 long was she present for?

20 MS. ROESER: Objection.

21 A. I don't recall. I was there
22 for less time than she was.

23 Q. Did you interact with her at
24 all on that May 2023 date?

25 A. Yes.

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2 MS. ROESER: Objection.

3 A. Yes.

4 Q. How many times did you witness
5 inappropriate or unwelcome actions, conduct
6 or comments during the production of the
7 film?

8 A. From what I recall, three
9 times.

10 Q. When was the first event?

11 A. The first one was during an
12 intimacy scene, or an intimate scene.

13 Q. Do you recall what month and
14 year that was?

15 A. June 2023.

16 Q. Was that during a rehearsal or
17 filming or something else?

18 A. During filming.

19 Q. Where did that scene --
20 withdrawn.

21 Where was that scene being
22 filmed?

23 A. In the house where I was
24 filming most of my scenes for that week.

25 Q. Was that in New Jersey?

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2 rehearsal?

3 A. After the rehearsal.

4 Q. And the scene was actually
5 filmed; is that correct?

6 A. Yes.

7 Q. Can you read what you wrote to
8 Lizzy Talbot?

9 A. Sure. "Thank you so so much
10 for your help!! You were incredible and
11 given I've never done that before I felt
12 like it was the easiest thing ever! So
13 thank you!!"

14 Q. And was that sent after an
15 intimate scene had been filmed?

16 A. Yes.

17 Q. Did you have any issues,
18 concerns, or problems with that scene?

19 MS. ROESER: Objection.

20 MR. MICHELMAN: Objection.

21 A. Other than what I referenced
22 earlier?

23 Q. Yes.

24 A. No.

25 Q. Other than what you have

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2 why would they be so adamant on having her
3 not like Blake if they didn't feel like
4 maybe it had something against them.

5 Q. Did Ms. Hoover share with you
6 at that time that Ms. Lively had raised
7 concerns about Mr. Baldoni and Mr. Heath's
8 conduct on set?

9 A. There was like a general
10 understanding that Blake and others in the
11 cast, like the older people in the cast,
12 didn't like him, but there was never any
13 specifics really referenced at that point
14 yet, other than what Colleen had said to me
15 about her own experience.

16 Q. You attended an event called
17 Book Bonanza, right?

18 A. Yes.

19 Q. Where was that?

20 A. In Texas, Fort Worth -- Dallas,
21 Texas, I think.

22 Q. In Texas?

23 A. Texas.

24 Q. Okay, that's good enough. And
25 was that roughly in June/July 2024?

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2 A. In June, yes.

3 Q. What is Book Bonanza?

4 A. It is a festival that I think
5 Colleen had been doing for a long time that
6 is for book fans, and, yeah.

7 Q. Who else attended Book Bonanza
8 from the film?

9 A. Brandon Sklenar, the producer,
10 Alex Saks, was there, Blake, and Colleen
11 and me.

12 Q. Who invited you to attend Book
13 Bonanza?

14 A. Colleen.

15 Q. Mr. Baldoni did not attend Book
16 Bonanza, correct?

17 A. Yes.

18 Q. Do you know -- do you have an
19 understanding of why he did not attend?

20 A. Colleen expressed to me that he
21 was meant to go and then due to the recent
22 light of events that had happened with him,
23 I think the dinner that they had had, it
24 seemed, again, the post-production conflict
25 that was occurring, Colleen didn't feel

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2 comfortable doing the festival with him
3 anymore, and so took him off of that. I
4 don't know if it was her specifically
5 taking him off, but I know that it was
6 meant to be him and then it wasn't and then
7 it was Blake and Brandon, and then I was
8 invited on.

9 Q. Colleen expressed to you
10 something to the effect that she wasn't
11 comfortable with Mr. Baldoni attending Book
12 Bonanza?

13 A. Yes.

14 Q. And did she share with you that
15 she wasn't comfortable with Mr. Baldoni
16 attending Book Bonanza because of the
17 behaviors on set as well as at the dinner
18 that she had been to with him?

19 MR. SCHUSTER: Objection.

20 A. Yes, and just the -- I think
21 the main thing that I remember her having
22 discomfort with is the fact that he had
23 been lying about her religion and her
24 religious faith and telling people that she
25 was of Bahá'í faith when she wasn't. I

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2 think that was the main thing of her
3 discomfort.

4 Q. If you could turn to Exhibit 3
5 in front of you. I'm looking at the page
6 stamped IF_18. I believe this is the chain
7 between -- a text chain between you and two
8 friends, right?

9 A. Yes.

10 Q. At the bottom of page -- of the
11 page stamped IF_18 you write "I know now
12 that I will be doing a press event in
13 Dallas with Colleen in Justin's place.
14 Colleen disinvited him."

15 Do you see that?

16 A. Yes.

17 Q. And does that refresh your
18 recollection that Colleen disinvited Justin
19 from attending Book Bonanza?

20 A. That was a bit of an
21 assumption. I can't say for sure, but from
22 my recollection, I do think she definitely
23 had a say in whether or not he was there.

24 Q. Okay. Are you aware of anyone
25 other than Ms. Hoover uninverting

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2 Mr. Baldoni from Book Bonanza?

3 A. No.

4 Q. There was a cut of the film
5 screened at Book Bonanza, right?

6 A. Yes.

7 Q. Are you aware if the cut that
8 was screened was Blake's cut or Justin's
9 cut?

10 A. Blake's cut.

11 Q. And did you have an
12 understanding that Ms. Hoover supported
13 Blake's cut of the film?

14 A. Yes.

15 Q. What was the fan reaction to
16 the cut at Book Bonanza?

17 MR. SCHUSTER: Objection.

18 A. Very positive.

19 Q. Standing ovation?

20 MR. SCHUSTER: Objection.

21 A. Yes.

22 Q. You were at Book Bonanza,
23 correct?

24 A. Yes.

25 Q. You were sitting in the