

# **Exhibit 87**

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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BLAKE LIVELY,  
Plaintiff,  
vs. CASE NO. 24-CV-10049-LJL (LEAD CASE)  
25-CV-449 (LJL) (MEMBER CASE)  
WAYFARER STUDIOS LLC, ET AL.  
Defendants.

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JENNIFER ABEL,  
Third-party Plaintiff,  
vs.  
JONESWORKS, LLC,  
Third-party Defendant.

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WAYFARER STUDIOS LLC, et al.  
Consolidated Plaintiffs,  
vs.  
BLAKE LIVELY, et al.  
Consolidated Defendants.

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VIDEO-RECORDED DEPOSITION OF VIVIAN BAKER  
Los Angeles, California  
Friday, September 12, 2025

Stenographically Reported by: Ashley Soevyn,  
CALIFORNIA CSR No. 12019

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1 Mr. Heath arrived unannounced to Ms. Lively's  
2 trailer?

3 A Not anything specific and certainly not  
4 anything quite like that.

5 Q Over the course of production on the  
6 film, did you or Ms. Carroll take any steps to  
7 prevent unannounced or uninvited entries to the  
8 trailer?

9 A Because of where Anne was stationed and  
10 where she worked -- she worked very closely to that  
11 door -- she told me that she began to lock the door.  
12 And it wouldn't necessarily be all the time because  
13 the ADs need to come in, and so you wouldn't -- you  
14 know, or Blake's assistants may need to come in.  
15 You wouldn't necessarily want to have the door  
16 locked because then you're going to have to open it.  
17 But there were times that I think she decided if  
18 we're definitely going to be in a place of undress,  
19 she may lock the door. We were also in a hurry.  
20 But it's a little unusual to lock the door. But  
21 Anne began to lock it, from time to time.

22 Q And was that to protect Ms. Lively's  
23 privacy?

24 A It would protect someone from being able  
25 to come in without us opening the door for them to

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1 conversations; is that a -- an accurate description?

2 A It is accurate. It's also accurate for  
3 me to be that way prior t [REDACTED]

17 MS. BENDER: Objection.

18 THE WITNESS: Of course not.

19 BY MS. GAROFALO:

20 Q Okay.

21 Did you ever see Steven Sarowitz on the  
22 set of It Ends with Us?

23 A I wasn't aware if he was.

24 Q Okay. You met Mr. Sarowitz, though, is  
25 that correct, during the production?

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1           A       I'm not aware of meeting him. I -- I may  
2 have, but I am not aware.

3           Q       Okay. So then I -- I assume it's correct  
4 that Mr. Sarowitz did not make any sexual advances  
5 to you during the filming?

6           A       That would be correct.

7           Q       Okay. And he didn't do anything that you  
8 deem inappropriate in connection with the production  
9 of the movie that you witnessed; is that correct?

10          A       That is correct.

11                   MR. ROBERTSON: Objection to form.

12                   MS. BENDER: Objection.

13                   THE WITNESS: That is correct.

14 BY MS. GAROFALO:

15           Q       Was it your impression that Ms. Lively  
16 didn't like Mr. Baldoni very much?

17                   MS. BENDER: Object.

18                   THE WITNESS: Generally, that was not my  
19 impression.

20 BY MS. GAROFALO:

21           Q       Did Ms. Lively ever criticize  
22 Mr. Baldoni's skills as a director to you?

23           A       I'm not aware of that.

24           Q       Okay. So you don't recall any instance  
25 which Ms. Lively complained that he was incompetent,