

Exhibit 24



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CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Transcript of Blake Lively

Date: July 31, 2025

Case: Lively -v- Wayfarer Studios, LLC, et al.

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Michigan #8598 | Nevada #089F | New Mexico #566

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 - - - - - - - - - - - - - - x

4 BLAKE LIVELY,

5 Plaintiff,

6 v.

7 WAYFARER STUDIOS LLC, a Civ. Action No.

Delaware Limited

8 Liability Company, 1:24-cv-10049-LJL

JUSTIN BALDONI, an

9 individual, JAMEY HEATH, (Consolidated for

an individual, STEVE

10 SAROWITZ, an individual, pretrial purposes with

IT ENDS WITH US MOVIE

11 LLC, a California 1:25-cv-00449-LJL)

Limited Liability

12 Company, MELISSA NATHAN, Rel. 1:25-cv-00779-LJL

an individual, THE

13 AGENCY GROUP PR LLC, a

Delaware Limited

14 Liability Company,

JENNIFER ABEL, an

15 individual, JED WALLACE,

an individual, and

16 STREET RELATIONS INC., a

California Corporation

17 Defendants.

18 - - - - - - - - - - - - - - x

19 Videotaped Deposition of BLAKE LIVELY

20 New York, New York

21 Wednesday, July 30, 2025

22 10:15 A.M.

23 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

24 Pages: 1 - 294

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

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1 ATTORNEY SCHUSTER: That's correct. 10:18:18

2 ATTORNEY HUDSON: Okay. Thank you. 10:18:20

3 B L A K E L I V E L Y, called as a witness,
4 having been first duly sworn by a Notary Public,
5 was examined and testified as follows:

6 EXAMINATION BY

7 ATTORNEY FREEDMAN:

8 Q Good morning. What's your full legal 10:18:25

9 name? 10:18:27

10 A [REDACTED] 10:18:27

11 Q And what is your date of birth? 10:18:33

12 A [REDACTED] 10:18:35

13 Q How long have you been an actress? 10:18:39

14 A 21 years. 10:18:42

15 Q Do you recall the year you started? 10:18:48

16 A Professionally, 2004. 10:18:51

17 Q You agreed to play the role of Lily Bloom 10:18:54

18 in It Ends With Us at the end of 2022; is that 10:19:03

19 correct? 10:19:09

20 A Yes. 10:19:09

21 Q Prior to that time, had you heard about 10:19:10

22 the book with the same title? 10:19:13

23 A Prior to agreeing? 10:19:16

24 Q Yes. 10:19:20

25 A Yes. 10:19:21

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1	Baldoni was?	10:30:56
2	A I was aware of him.	10:30:57
3	Q How were you aware of him?	10:31:02
4	A I am friends with and follow Liz Plank who	10:31:04
5	does a podcast with him. And I follow an account	10:31:13
6	called CelebrityKind, who has featured him before.	10:31:20
7	That was the extent of my awareness.	10:31:26
8	Q When did you first meet Liz Plank?	10:31:27
9	A I don't recall. Around 2020.	10:31:36
10	Q How did you meet Liz Plank?	10:31:39
11	A I don't -- I don't remember. We have a	10:31:46
12	lot of mutual friends.	10:31:53
13	Q Who are your mutual friends?	10:31:57
14	ATTORNEY HUDSON: Objection.	10:31:59
15	A Kate Vorhoff, Justin Trudeau. They're	10:32:02
16	people that -- with more degrees of separation	10:32:23
17	that we have run in the same circles as.	10:32:29
18	Q Now, I understand that you had heard that	10:32:33
19	Justin Baldoni was involved in the film.	10:32:40
20	What did you learn about what his	10:32:43
21	involvement was?	10:32:45
22	ATTORNEY HUDSON: Objection.	10:32:47
23	A I learned that he was the director and was	10:32:49
24	to star as the male lead in the film, as well as	10:33:01
25	retaining the rights, as Warren described.	10:33:06

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1 Q And did you have any concern prior to 10:42:58
2 accepting the role that that would be some sort of 10:43:02
3 an issue, that he would be both the lead actor and 10:43:06
4 also, you know, be the director? 10:43:13

5 A I have worked with actors before who have 10:43:19
6 been both the actor and director. So it's not 10:43:24
7 necessarily an immediate concern, but there are 10:43:34
8 many factors at play with each person. 10:43:39

9 Q And were there factors at play 10:43:44
10 specifically with Mr. Baldoni as the male lead and 10:43:47
11 the director during that time? 10:43:51

12 A Specific to him, not necessarily. Every 10:43:55
13 job, you have to consider all elements and all 10:44:04
14 factors. 10:44:06

15 Q Okay. Prior to accepting the role to play 10:44:07
16 Lily Bloom, had you met Justin Baldoni? 10:44:09

17 A Yes. 10:44:12

18 Q On how many occasions? 10:44:13

19 A One. 10:44:15

20 Q Where was that meeting? 10:44:17

21 A In New York City, in my apartment. 10:44:18

22 Q How long did that meeting last? 10:44:22

23 A I don't recall. It was a couple hours. 10:44:32

24 Q And do you recall when that meeting was? 10:44:38

25 A December of 2022. 10:44:44

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1 Q And how was it determined that that 10:44:46
2 meeting would take place at your apartment in New 10:44:50
3 York City? 10:44:55
4 A Agents from my end. I don't know how it 10:44:55
5 was determined from anyone else's. 10:45:01
6 Q And do you recall the day that you 10:45:03
7 actually met Justin Baldoni in your apartment? 10:45:06
8 ATTORNEY HUDSON: Objection. 10:45:09
9 A Are you asking about the date? 10:45:09
10 Q Yes. 10:45:13
11 A No. 10:45:14
12 Q Do you know whether it was during the day 10:45:14
13 or in the evening? 10:45:18
14 A Day. 10:45:19
15 Q And who was present at that meeting? 10:45:20
16 A At the meeting -- well, the two of us were 10:45:28
17 in the meeting, but there were many people 10:45:42
18 present. 10:45:45
19 Q Who else was present? 10:45:46
20 A My sister was there. My family was there. 10:45:48
21 We have employees coming in and out constantly. 10:45:53
22 Q And tell me what you recall about that 10:46:00
23 meeting and what you said during that meeting. 10:46:07
24 A Can you be more specific? 10:46:10
25 Q Sure. 10:46:12

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1 Q Do you believe that you were personally 11:33:47
2 sexually harassed in connection with the making of 11:33:55
3 the film It Ends With Us? 11:33:57

4 ATTORNEY HUDSON: Objection. 11:33:58

5 A Yes. 11:34:00

6 Q Who do you believe sexually harassed you? 11:34:01

7 A Justin Baldoni and Jamey Heath. 11:34:08

8 Q Anyone else? 11:34:17

9 A If you're asking if my gender played a 11:34:19
10 role in the behavior towards me, I would add Steve 11:34:35
11 Sarowitz to that. 11:34:42

12 Q How did Steve Sarowitz sexually harass 11:34:44
13 you? 11:34:48

14 A He was the chairman of the studio, is my 11:34:49
15 understanding. And this is the studio that I was 11:35:13
16 raising concerns with. And instead of addressing 11:35:22
17 concerns, I believe that I was dismissed. And so 11:35:33
18 to use my own description, I do believe my gender 11:35:54
19 played a role in how I was treated. 11:35:59

20 Q Did you ever discuss with Steve Sarowitz 11:36:03
21 the fact that you were sexually harassed? 11:36:06

22 A No. 11:36:12

23 Q Did Steve Sarowitz ever say anything to 11:36:13
24 you that you felt was inappropriate or made you 11:36:30
25 uncomfortable? 11:36:34

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1 A To me? No. 11:36:35

2 Q Did Steve Sarowitz affirmatively do 11:36:42

3 anything himself that made you feel uncomfortable 11:36:50

4 or you felt was inappropriate? 11:36:57

5 A I felt him attending the birthing scene 11:37:01

6 was inappropriate. 11:37:05

7 Q When was the birthing scene? 11:37:07

8 A May of 2023. 11:37:19

9 Q What did Justin Baldoni do to sexually 11:37:20

10 harass you? 11:37:49

11 ATTORNEY HUDSON: Objection. 11:37:50

12 A Can you be more specific? 11:37:51

13 Q Sure. 11:37:58

14 You're claiming that Justin Baldoni 11:37:59

15 sexually harassed you, correct? 11:38:01

16 A Yes. It's a long complaint. 11:38:03

17 Q Is that "yes"? 11:38:05

18 A Yes. 11:38:09

19 Q What did he do to sexually harass you? 11:38:10

20 ATTORNEY HUDSON: Objection. 11:38:16

21 A There were a series of things. 11:38:18

22 Q Do you recall the first thing that he did 11:38:29

23 where you felt you were sexually harassed? 11:38:31

24 ATTORNEY HUDSON: Objection. 11:38:42

25 A There were things that he said and did 11:38:43

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1 where at the time, you don't totally -- you feel 11:38:51
2 confused by someone's behavior or words being at 11:39:11
3 odds with who they say they are. And you start to 11:39:22
4 see different pieces come together, and it 11:39:35
5 feels -- the workplace feels overwhelming. So 11:39:48
6 there were different moments. 11:39:52

7 Q What is the first thing that you recall? 11:39:54

8 A I recall him telling me that he's 11:40:00
9 circumcised. 11:40:07

10 Q When did he tell you that? 11:40:09

11 A In December of 2022. 11:40:15

12 Q And where were you physically when he told 11:40:20
13 you that? 11:40:25

14 A At my apartment. 11:40:27

15 Q Was that the same meeting that we were 11:40:29
16 previously discussing or a different meeting? 11:40:40

17 A It was the same meeting. 11:40:42

18 Q And how did that come up? Were you 11:40:43
19 discussing something or it just came up out of the 11:40:50
20 blue? 11:40:53

21 A I was pregnant and I didn't know the 11:40:53
22 gender of my child. And we were discussing 11:40:59
23 different decisions that parents make and 11:41:06
24 different factors, having boys versus girls. I 11:41:12
25 only had girls. And we were discussing the 11:41:19

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1 different medical decisions people make these 11:41:29
2 days, including circumcision for male babies. 11:41:32
3 Q And did he bring that up or did you bring 11:41:37
4 that up? 11:41:41
5 A I don't remember. 11:41:41
6 Q What did he say about circumcision? 11:41:42
7 A He told me the decision that they made for 11:41:50
8 their child. They, being him and his wife Emily. 11:42:00
9 And then he offered that he was circumcised. 11:42:05
10 Q And did you say anything in response to 11:42:10
11 that? 11:42:12
12 A I was in shock. 11:42:12
13 Q You say you were in shock. You couldn't 11:42:14
14 speak or? 11:42:19
15 A I don't know. I don't know what I -- I 11:42:21
16 don't know what I said or did. 11:42:26
17 Q Did you tell him that you were offended by 11:42:28
18 it? 11:42:33
19 A No. 11:42:34
20 Q Did you discuss with anyone the fact that 11:42:36
21 you were offended by him saying that? 11:42:40
22 A Yes. 11:42:42
23 Q Who did you -- who did you discuss that 11:42:46
24 with? 11:42:49
25 A My husband. 11:42:49

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1	ATTORNEY HUDSON: Objection.	11:44:35
2	A About what? Can you be more specific?	11:44:35
3	Q About him being circumcised.	11:44:38
4	A About him being circumcised, that's all I	11:44:40
5	remember.	11:44:44
6	Q Did his comment in any way cause you to	11:44:45
7	reconsider whether you wanted to do the film or	11:44:58
8	not?	11:45:01
9	A I found it disturbing, but given that it	11:45:02
10	was one comment and he seemed nice, I wrote it off	11:45:12
11	as him taking a benign conversation too far and	11:45:22
12	hoped and assumed it would be an isolated	11:45:38
13	incident.	11:45:42
14	Q Did you ever tell him that he had taken	11:45:42
15	that comment -- and by making that comment, he had	11:45:48
16	taken that too far?	11:45:52
17	A Yes.	11:45:53
18	Q Okay. When did you tell him that?	11:45:54
19	A Me personally?	11:45:56
20	Q Yes.	11:46:01
21	A I believe the date was January 4th, 2023.	11:46:03
22	Q Prior to January 4th, 2023, had you told	11:46:10
23	him that he had taken that too far and that was an	11:46:20
24	inappropriate comment?	11:46:24
25	A That specific comment?	11:46:25

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1 Q Yes. 11:46:27

2 A No. 11:46:27

3 Q Is there a reason why you didn't say that 11:46:28

4 to him? 11:46:31

5 A There are a lot of reasons. He was my 11:46:31

6 boss. 11:46:40

7 Q He was your boss at that time? 11:46:40

8 A Not at that moment, but later. You asked 11:46:44

9 why I didn't say something later. 11:46:47

10 Q Is there a reason you didn't say something 11:46:48

11 at that time? 11:46:51

12 ATTORNEY HUDSON: Objection. 11:46:52

13 A I believe I already answered that 11:46:53

14 question. 11:46:56

15 Q Did you discuss with Warren Zavala that 11:46:56

16 comment that was made? 11:47:14

17 A I don't believe so, but I don't recall. 11:47:15

18 Q Did you discuss with anyone else -- anyone 11:47:19

19 else that represents you, like your manager or 11:47:33

20 your agents or anyone else like that, that he had 11:47:35

21 made that comment? 11:47:38

22 ATTORNEY HUDSON: Well, objection to the 11:47:39

23 extent that question calls for attorney-client 11:47:40

24 privileged communications. 11:47:42

25 If you can answer that question without 11:47:44

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1 what works better for me is to not read the book 11:54:23
2 in advance because it is hard for me to see the 11:54:28
3 blind spots in the film because you can't unlearn 11:54:37
4 what you know from a book. You can't fill in 11:54:41
5 story or character holes from what you know from a 11:54:44
6 book. So I like to look at the film as its own 11:54:47
7 piece to make sure that it works on its own. 11:54:50

8 Q In April of 2023, did you know that there 11:54:58
9 were sex scenes in the novel, It Ends With Us? 11:55:01

10 A Yes. 11:55:06

11 Q And did you know what sex scenes there 11:55:06
12 were? 11:55:09

13 A I don't understand your question. 11:55:09

14 Q Sure. 11:55:14

15 The book It Ends With Us has sex scenes 11:55:17
16 within the book, correct? 11:55:23

17 ATTORNEY HUDSON: Objection. 11:55:25

18 A I believe so, yes. 11:55:27

19 Q You're not sure, though, right? 11:55:28

20 A I know there are sex scenes in the book, 11:55:31
21 yes. 11:55:36

22 Q Did you read the book? 11:55:36

23 A No. 11:55:38

24 Q How do you know that there are sex scenes 11:55:39
25 in the book? 11:55:45

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1 Q Hi. Good afternoon. 13:38:04

2 I just want to walk through some of the 13:38:06

3 other allegations of sexual harassment. 13:38:09

4 One of the things that's alleged in the 13:38:16

5 amended complaint is, I believe that you're saying 13:38:18

6 that Justin complimented your outfit; is that 13:38:26

7 correct? 13:38:31

8 ATTORNEY HUDSON: Objection. 13:38:31

9 A No. 13:38:32

10 Q Are you saying that one of the instances 13:38:51

11 of sexual harassment or something that made you 13:38:52

12 otherwise uncomfortable was there was one day in 13:38:58

13 which Justin commented how much he liked your 13:39:03

14 outfit? 13:39:06

15 A No. 13:39:07

16 Q Did Justin ever say anything inappropriate 13:39:08

17 or that bothered you concerning an outfit that you 13:39:26

18 wore? 13:39:35

19 ATTORNEY HUDSON: Objection. 13:39:38

20 A There was an incident that made me 13:39:39

21 uncomfortable, yes. 13:39:50

22 Q And when was that incident? 13:39:53

23 A Late May of 2023. 13:39:58

24 Q Do you recall the date? 13:40:00

25 A I don't know the exact date, no. 13:40:02

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1 Q And do you recall where that took place? 13:40:15
2 A Yes. 13:40:17
3 Q Where did it take place? 13:40:20
4 A On a set, a bar set when we were 13:40:21
5 rehearsing. 13:40:30
6 Q That was that bar scene? 13:40:30
7 A No, it was -- we were rehearsing that 13:40:32
8 scene, but, no, it was not the scene. It was when 13:40:35
9 I arrived to work. 13:40:37
10 Q And can you tell me what happened? 13:40:38
11 A Can you be more specific? Sorry. 13:40:42
12 Q Sure. 13:40:46
13 What about whatever happened there made 13:40:47
14 you feel uncomfortable? 13:40:50
15 A I was wearing a -- I had a newborn baby, 13:40:51
16 and I had a jacket on and -- that was covering my 13:40:58
17 dress underneath. And I bent down to pick 13:41:04
18 something up, and the jacket opened. And my dress 13:41:08
19 was low-cut because it was easier to feed my baby. 13:41:13
20 And Mr. Baldoni said in front of -- Justin said in 13:41:23
21 front of -- I remember in front of Jenny Slate, 13:41:31
22 and I don't remember specifically who else was 13:41:39
23 there, but he said, "I like your outfit," and he 13:41:42
24 gestured at the chest. 13:41:46
25 Q You just made a movement of your hand. 13:41:51

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1 A Yes. 13:41:55

2 Q It's hard for the court reporter to mark 13:41:56

3 those down. 13:41:57

4 What do you mean he made a gesture of his 13:41:59

5 hand and said, "I like your dress"? 13:42:02

6 A He gestured across the chest. 13:42:04

7 Q Did he gesture across your chest or his 13:42:08

8 chest? 13:42:11

9 A He said, "I like your outfit." 13:42:12

10 Q He moved his hand up and down, like, above 13:42:17

11 and below his chest or your chest? 13:42:20

12 A I was standing in front of him, so I don't 13:42:22

13 know whose chest, but he didn't touch my chest -- 13:42:28

14 Q Okay. 13:42:28

15 A -- if that's what you're asking. 13:42:33

16 Q When he made the gesture in front of his 13:42:34

17 chest, was his arm closer to his chest or closer 13:42:37

18 to your chest? 13:42:41

19 A I don't recall. 13:42:45

20 Q And what were you doing during this time? 13:42:46

21 Was it during a rehearsal of some sort? 13:42:57

22 A We weren't rehearsing the scene yet, but I 13:42:59

23 was on the set to rehearse the scene. 13:43:03

24 Q And who else was present, if anyone? 13:43:05

25 A The person I remember most is obviously 13:43:11

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1 Do you recall an instance like that? 14:02:39

2 A Yes, those words were used. I have a lot 14:02:41

3 of recollection of, in general, words like that 14:02:50

4 being used. 14:02:55

5 Q Do you have a specific recollection of a 14:02:56

6 day, time, or scene that Justin had used those 14:03:02

7 words? 14:03:08

8 A They would be used in the context of the 14:03:09

9 film, scenes that needed to be sexy, characters or 14:03:12

10 wardrobe. Yeah, that would be used in that way. 14:03:26

11 That never made me uncomfortable. 14:03:35

12 Q Okay. So is it fair to say that any time 14:03:37

13 that Justin either used the term "sexy" or "hot," 14:03:40

14 that didn't make you feel uncomfortable; is that 14:03:44

15 correct? 14:03:46

16 ATTORNEY HUDSON: Objection. 14:03:46

17 A That's not what I said. 14:03:47

18 Q And has Justin ever used the term "sexy" 14:03:48

19 or "hot" where it made you feel uncomfortable? 14:03:53

20 A Yes. 14:03:55

21 Q Okay. When was that? 14:03:56

22 A Late May of 2023. 14:03:57

23 Q And where were you located? 14:03:59

24 A The bar set. 14:04:09

25 Q That was part of the filming of the -- of 14:04:12

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1 the movie? 14:04:18

2 A The bar was a set for the film. It was a 14:04:19

3 real bar, but it was used as a location in the 14:04:27

4 movie. 14:04:30

5 Q And do you recall what time of day that 14:04:31

6 was? 14:04:35

7 A It was early in the day. 14:04:36

8 Q And where were you standing when he made 14:04:39

9 these comments? 14:04:49

10 A In the bar set? 14:04:50

11 Q Yes. 14:04:53

12 You were standing in the bar set? Any 14:04:55

13 more description you can give me about where in 14:04:58

14 the bar -- in the bar you were standing? 14:05:00

15 A There was a table that we were all acting 14:05:05

16 around that was probably in the middle of the bar. 14:05:10

17 But we hadn't begun the scene yet, so we were in 14:05:16

18 the midst of the bar set. 14:05:22

19 Q And what happened specifically? 14:05:24

20 A With what? 14:05:29

21 Q With him using the terms "sexy" or "hot"? 14:05:31

22 A He asked me to remove a coat that I was 14:05:36

23 wearing, which was a wardrobe coat, which was a 14:05:40

24 part of the look that had been photographed and 14:05:47

25 shared for that scene. And when I arrived to set, 14:05:55

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1 he asked me once I was on set amongst others -- I 14:06:02
2 remember once again Jenny Slate standing there -- 14:06:10
3 and he said, "Can you take off your coat?" 14:06:15
4 And I thought that it was a more 14:06:22
5 interesting outfit to wear the coat. I thought it 14:06:24
6 was more eclectic and dynamic. And he said, 14:06:26
7 "Well, we want to see it without the coat." 14:06:34
8 So I took the coat off, and under the 14:06:38
9 coat, I was wearing a onesie that was zipped low 14:06:41
10 with a lace bra peeking out, because the scene 14:06:48
11 after this is a sex scene or a hookup scene, 14:06:53
12 rather. And he asked me to take off the coat. 14:06:57
13 And I'm standing amongst many cast and crew and 14:07:03
14 extras, and I felt on display. And he said, "I 14:07:10
15 think you look sexy." 14:07:17
16 And I said, "That's not what I'm going 14:07:18
17 for." 14:07:22
18 And he said, "Oh, I'm sorry. Hot?" 14:07:23
19 And I said, "Not that either." 14:07:27
20 And then he said, "Ah, well, I guess I 14:07:29
21 missed the HR meeting." 14:07:32
22 And became -- looked at me. I remember 14:07:34
23 him being aware of Jenny Slate and getting a 14:07:38
24 little huffy and walked off. And I performed the 14:07:42
25 scene without the coat. 14:07:51

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1 that he came into your trailer? 14:41:04

2 A Evening. 14:41:06

3 Q And was the trailer unlocked? 14:41:07

4 A I don't know if it was unlocked at that 14:41:12

5 point. He attempted to come in and we stopped him 14:41:15

6 from coming in. 14:41:18

7 Q When you say "we," who are you referring 14:41:19

8 to? 14:41:21

9 A My hair and makeup artists. 14:41:21

10 Q Did you have your security there at the 14:41:23

11 time? 14:41:25

12 A In my trailer, no. 14:41:26

13 Q Outside your trailer? 14:41:28

14 A I don't know where they were standing at 14:41:31

15 that moment. 14:41:33

16 Q The name of your security person is Kevin, 14:41:33

17 correct? 14:41:36

18 ATTORNEY HUDSON: Objection. 14:41:36

19 A We have different people who rotate. 14:41:37

20 Q But is there -- was there always 14:41:39

21 someone -- a security person outside your trailer? 14:41:42

22 ATTORNEY HUDSON: Objection. 14:41:45

23 A Not necessarily stationed right outside of 14:41:46

24 the hair and makeup door. They patrol. 14:41:50

25 Q Do you know -- as you sit here today, do 14:41:53

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1 you recall that specific second day of production, 14:41:56
2 whether or not there was a security person outside 14:42:00
3 your trailer? 14:42:01

4 ATTORNEY HUDSON: Objection. 14:42:03

5 A I don't recall, no. I was inside the 14:42:05
6 trailer, so I wouldn't have seen who was standing 14:42:09
7 there. 14:42:12

8 Q Did you ever call out for security or ask 14:42:12
9 for security to come in and take Jamey away? 14:42:16

10 ATTORNEY HUDSON: Objection. 14:42:19

11 A No. 14:42:24

12 Q And how long was Jamey in your trailer 14:42:24
13 for? 14:42:26

14 A I don't know exactly, but I would say 14:42:32
15 around five minutes. 14:42:34

16 Q And what was discussed during the five 14:42:36
17 minutes that he was in your trailer? 14:42:39

18 A We were meant to have a production meeting 14:42:45
19 that night, and I -- he came to my trailer as I 14:42:47
20 was -- we were going to have a production meeting 14:42:58
21 in my trailer. And he came to the hair and makeup 14:43:00
22 trailer as I was getting my body makeup removed 14:43:03
23 and my wig off and -- so that I could wrap out 14:43:06
24 hair and makeup and then I could then go into the 14:43:11
25 -- my own trailer and I have a meeting with them. 14:43:16

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1 He unexpectedly came to my trailer, 14:43:18
2 knocked on the door, said, "We've got to talk." 14:43:21
3 I said, "We can't talk right now. I'll be 14:43:24
4 there in a few minutes. I'm getting done as fast 14:43:27
5 as I can so we can have this meeting." 14:43:29
6 He said, "Oh, no, we've got to talk 14:43:29
7 now" -- 14:43:33
8 (Reporter clarification.) 14:43:33
9 THE WITNESS: From where? 14:43:37
10 (Reporter clarification.) 14:43:44
11 A I said, "I'll meet you in there in a 14:43:44
12 minute. I'm getting -- I'm undressed. I'm 14:43:48
13 getting ready for the meeting. I'll be there in 14:43:50
14 just a minute." 14:43:52
15 And he said, "If we don't meet now, we 14:43:53
16 can't do that meeting." 14:43:55
17 And that meeting was very important to me 14:43:56
18 because it was to discuss other behavior I had 14:44:00
19 experienced earlier that day that was concerning 14:44:03
20 to me. 14:44:06
21 So I said, "Okay, fine, you can come in." 14:44:09
22 And he came in and I said, "Okay, you can 14:44:12
23 come in, but please don't look. Can you turn 14:44:15
24 around?" 14:44:18
25 So he turned around and he faced the wall. 14:44:18

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1 And I was in front of the hair and makeup mirror 14:44:21
2 as my team was working -- they call it 14:44:26
3 double-teaming when they're both working at the 14:44:29
4 same time to either get you ready or disassemble 14:44:32
5 you. 14:44:34

6 And I was helping as well so that we could 14:44:35
7 work quickly. And Jamey said that the meeting had 14:44:40
8 to happen on my time, the meeting we were about to 14:44:44
9 have; that it -- because of my turnaround, which 14:44:49
10 is the time -- from the time that I am done with 14:44:55
11 work until the time I start again, my turnaround 14:44:57
12 was 12 hours. 14:45:00

13 And he said, "This meeting has to be on 14:45:01
14 your clock. We don't have time for this." 14:45:03

15 And I said, "This isn't a personal 14:45:05
16 meeting. This is a production meeting to discuss 14:45:08
17 how to make the set better and smoother." 14:45:10

18 And he was arguing for it to be I on my 14:45:19
19 personal time. And I said, "My personal time is 14:45:22
20 important to me because I have a newborn baby. 14:45:24
21 When I go home I prepare for the next day. I feed 14:45:27
22 my baby. I work out. I have a lot of 14:45:30
23 responsibilities. I really need my time, and this 14:45:32
24 is not a personal meeting; it's a production 14:45:35
25 meeting." 14:45:37

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1 And as I'm having this negotiation with 14:45:38
2 him, I turn to him and he's staring straight at 14:45:40
3 me. He's no longer facing the wall. He's staring 14:45:46
4 straight at me. 14:45:49

5 And I said, "Jamey, what are you doing? 14:45:50
6 You said you would turn around." 14:45:54

7 "Oh, oh, sorry. I like to make eye 14:45:55
8 contact with people when I talk to them." 14:45:57

9 And I said, "You need to leave." 14:45:59

10 And so he left the trailer. And I 14:46:01
11 finished -- I finished getting ready. I was 14:46:04
12 incredibly shaken. My memory is my hair and 14:46:12
13 makeup -- the women who did my hair and makeup 14:46:18
14 were shaken as well. 14:46:24

15 And then I finished doing my work and I 14:46:28
16 went in and I took the meeting. 14:46:32

17 Q When you said he was looking at you, was 14:46:33
18 he looking in your eyes or somewhere else? 14:46:42

19 A Well, when I turned, he was fully facing 14:46:43
20 me and I was topless. So I don't know all of the 14:46:46
21 contours of my body that his eyes were on. 14:46:52

22 Q Okay. And when you were topless, did you 14:46:54
23 have body makeup on? 14:46:57

24 A Yes. 14:46:58

25 Q And as you sit here today, you don't 14:46:59

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1	Q And what did he say?	14:49:47
2	A To which one?	14:49:51
3	Q To why those scenes existed, any one.	14:49:56
4	A The characters climaxing at the same time,	14:50:01
5	he told me that he and his wife orgasm at the same	14:50:13
6	time and asked me if my husband and I do the same.	14:50:21
7	When I said that the scenes felt	14:50:25
8	pornographic, he said -- he shared with me that	14:50:30
9	he, as he put it, had been previously addicted to	14:50:36
10	pornography, and so he understood it very well.	14:50:42
11	And that the scenes were not in fact pornographic,	14:50:46
12	but instead they were told through the female gaze	14:50:49
13	because this is what women wanted to see; that	14:50:52
14	women often see -- that women want to see	14:50:55
15	themselves being pleasured on camera.	14:51:06
16	There was a scene that he was proposing in	14:51:11
17	which he brings the character -- his character	14:51:13
18	Ryle brings the character Lily to orgasm on	14:51:19
19	camera, and I felt like I would be mortified to	14:51:23
20	shoot something like that at this stage in my life	14:51:30
21	and career and being the mother of four kids, and	14:51:32
22	given that that was not in the understanding of	14:51:36
23	the script that I came into the film with.	14:51:39
24	He told me that those were some of his	14:51:45
25	most precious memories, and I don't remember the	14:51:48

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1 exact words he used, but between him and his wife 14:51:52
2 when he would bring her to orgasm. And she would 14:51:55
3 ask to then, I guess, do what needed to happen for 14:52:00
4 him, and he would say, no, that's enough. 14:52:06
5 That was -- 14:52:10
6 Q So was this in connection with the 14:52:11
7 creation of a scene? 14:52:13
8 ATTORNEY HUDSON: Objection. 14:52:16
9 A Was what in connection with the creation 14:52:17
10 of a scene? 14:52:20
11 Q This discussion about what -- how the sex 14:52:20
12 scene should go, was he discussing with you why he 14:52:24
13 felt like the sex scene should go one way versus 14:52:28
14 another? 14:52:34
15 A He was using personal experiences and 14:52:34
16 descriptives in a conversation that my intention 14:52:37
17 was to discuss the gratuitous sex that I felt 14:52:40
18 had -- I felt -- it was added, but I felt it was 14:52:47
19 gratuitous -- that had been added to the script. 14:52:50
20 And my intention was to have a creative discussion 14:52:52
21 about the sex scenes. And they made a surprising 14:52:54
22 and really disturbing departure into personal 14:52:58
23 conversations. 14:53:03
24 Q Where did that meeting take place? 14:53:09
25 A At my office. 14:53:10

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1 shutting down the conversation, that's how I told 14:58:26
2 him to stop. 14:58:30

3 Q So the actual words that you used -- that 14:58:31
4 you used was saying, "I've never seen it"; is that 14:58:34
5 right? 14:58:37

6 A Well, his attempt was to explain 14:58:37
7 pornography and what that was and how what I felt 14:58:41
8 to be pornographic wasn't in fact pornographic. 14:58:48
9 And that he was expressing his expertise on it 14:58:53
10 given his previous addiction. 14:59:01

11 And in an effort to no longer be talking 14:59:04
12 about pornography, because I was never trying to 14:59:07
13 talk about pornography, I said the scenes felt 14:59:09
14 pornographic, and I wasn't opening a door to 14:59:14
15 discuss pornography or anyone's past with it, I 14:59:16
16 attempted to shut it down and change the subject. 14:59:21

17 Q And did you ever tell Justin, "Don't talk 14:59:24
18 about pornography to me anymore"? 14:59:31

19 A That's what I felt like I expressed. 14:59:32

20 Q And you expressed that by using the words, 14:59:36
21 "I've never seen it"? 14:59:39

22 ATTORNEY HUDSON: Objection. 14:59:40

23 A I said, "I've never seen pornography. I 14:59:40
24 don't know anything about it." 14:59:43

25 Q Prior to saying that to Justin, had you 14:59:45

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1 Q Sure. 15:01:15

2 Are you claiming that as part of your 15:01:15

3 lawsuit, that it was sexual harassment that either 15:01:17

4 Justin or Jamey disclosed to the cast and crew 15:01:20

5 that you never looked at pornography? 15:01:25

6 ATTORNEY HUDSON: Objection. 15:01:27

7 A I felt upset and disturbed and exposed 15:01:28

8 that an effort at deflecting something that he had 15:01:37

9 said that felt like it had crossed a line, instead 15:01:42

10 of him taking that and not doing it anymore, that 15:01:49

11 he took that and used that in front of other crew 15:01:53

12 members in the workplace. 15:02:00

13 Q And is this just Justin or Jamey also? 15:02:02

14 A Jamey was always around Justin. They were 15:02:05

15 a pair. So my memory of them together on set and 15:02:10

16 that was them together. 15:02:20

17 Q Did you actually overhear Justin or Jamey 15:02:21

18 tell crew members or cast members that you never 15:02:25

19 looked at pornography? 15:02:32

20 A Yes, I remember hearing that. 15:02:36

21 Q You heard it from them directly? 15:02:39

22 A I remember hearing from that from Justin, 15:02:41

23 yes. 15:02:45

24 Q And Justin said that in front of you? 15:02:46

25 A Yes. 15:02:49

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1 Q And who did he tell? 15:02:49

2 A I don't remember specifically. I remember 15:02:51

3 him speaking about pornography in a casual way. 15:03:01

4 And he said, "Oh, Blake doesn't know anything 15:03:13

5 about it; she's never seen it." 15:03:20

6 Q When was this? What date? 15:03:22

7 A I don't remember what date. 15:03:24

8 Q Do you remember the month? 15:03:25

9 A It would have been in May of 2023. 15:03:26

10 Q Did you bring this up with Ange? 15:03:28

11 A I don't remember if I made it to that. 15:03:34

12 Q Did you bring it up with anybody at Sony? 15:03:40

13 A Eventually, yes. 15:03:43

14 Q In May or June, did you bring it up to 15:03:47

15 them? 15:03:51

16 A No. I don't know if I made it to that. 15:03:52

17 Like I said, Ange shut me down quickly, telling me 15:03:55

18 I couldn't file an HR claim through her, through 15:03:59

19 Sony. 15:04:03

20 Q Who was the -- who was there when Justin 15:04:03

21 was saying that you had never seen pornography? 15:04:12

22 Who in the cast or crew were present for that? 15:04:18

23 ATTORNEY HUDSON: Objection. 15:04:20

24 A I don't remember specifically. I remember 15:04:23

25 the feeling more than I remember the specifics. 15:04:31

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1 A Can you be more specific? 15:41:23
2 Q Sure. 15:41:24
3 Did Leslie Sloane call you and tell you 15:41:25
4 that she received information from Stephanie Jones 15:41:29
5 about a smear campaign or something similar to 15:41:38
6 that? 15:41:39
7 A She did not. 15:41:39
8 Q Did you learn from Leslie Sloane that 15:41:40
9 there were text messages in Jen Abel's phone? 15:41:46
10 A No. 15:41:51
11 Q Who did you learn that from? 15:41:52
12 A Ashley Avignon. 15:41:53
13 Q Who is that? 15:41:56
14 A She's a friend of mine. 15:41:58
15 Q And what did she tell you? 15:42:00
16 A She said that a woman that she knows named 15:42:04
17 Stephanie Jones was trying to get in touch with 15:42:13
18 me. She gave me more details. 15:42:20
19 Q When did she tell you that? 15:42:25
20 A Late August of 2024. 15:42:27
21 Q And did she tell you that in writing or on 15:42:32
22 the telephone? 15:42:37
23 A On the phone. 15:42:38
24 Q And what else did she tell you? 15:42:39
25 A She told me that she works with a woman in 15:42:47

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1 another. And each day, key crew members were not 16:33:00
2 there, which is odd on a film set. There is not a 16:33:08
3 lot of substitution with key members. And I 16:33:12
4 noticed that a key member or two was missing. And 16:33:17
5 then the next day, there were more missing. And 16:33:21
6 then I noticed that I started to feel symptoms. 16:33:25
7 And I asked someone where the crew members were, 16:33:30
8 and I was told that they had COVID. 16:33:34

9 And I asked Alex Saks if she knew that. 16:33:37

10 And she said yes. 16:33:42

11 And I said, "Why didn't anyone let me 16:33:44
12 know?" 16:33:48

13 And she said, "Well, there aren't -- there 16:33:48
14 aren't necessarily COVID protocols that we have to 16:33:55
15 follow anymore." 16:33:59

16 And I said, "I understand, but I'm the 16:34:00
17 only person who can't wear a mask." 16:34:02

18 And if I knew that people were sick, per 16:34:04
19 SAG, I could ask for people to test when they 16:34:08
20 arrive at work. Just for the time period where 16:34:11
21 there is an outbreak, I could ask that others in 16:34:14
22 close proximity wear a mask. It's not something I 16:34:16
23 would have exercised usually because -- if there 16:34:19
24 wasn't an outbreak, because I wouldn't want to do 16:34:22
25 -- put additional burden on the budget or the 16:34:25

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1 ATTORNEY HUDSON: Just before you go on, 16:38:44
2 are you okay? 16:38:45
3 THE WITNESS: Yeah. 16:38:46
4 ATTORNEY FREEDMAN: Do you want to take a 16:38:46
5 break? 16:38:47
6 THE WITNESS: No, it's fine. Let's go. 16:38:47
7 Q On the June 1st meeting, did you expressly 16:38:50
8 tell Mr. Baldoni and Mr. Heath that there were 16:38:54
9 serious HR problems on the set? 16:38:58
10 A I don't know what words I used because I 16:39:02
11 wasn't planning on addressing the HR issues with 16:39:05
12 them directly in my trailer with Alex Saks in that 16:39:09
13 moment. But I did express real concern for the 16:39:15
14 things that had occurred thus far, including Jamey 16:39:18
15 entering my trailer when I was naked from the 16:39:22
16 waist up. 16:39:27
17 Q So when Jamey showed you the video of the 16:39:27
18 birthing scene, the afterbirthing scene -- are you 16:39:35
19 familiar with that? 16:39:40
20 ATTORNEY HUDSON: Objection. 16:39:40
21 A That's not what I said, no. 16:39:42
22 Q Do you recall Jamey showing you a still 16:39:43
23 image on his iPhone? 16:39:48
24 ATTORNEY HUDSON: Objection. 16:39:50
25 A No, I recall a moving image. 16:39:51

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1 Q Did you watch the movie? 16:39:54
2 ATTORNEY HUDSON: Objection. 16:39:55
3 A Movie? I wouldn't characterize it as a 16:39:56
4 movie, no. 16:39:59
5 Q Well, did you just say "movie image"? 16:40:00
6 A "Moving image." 16:40:03
7 Q Oh, "moving image." I apologize. 16:40:05
8 Did you watch the moving image? 16:40:07
9 A As soon as I saw that it was a naked woman 16:40:10
10 fully exposed, I asked him to stop. 16:40:14
11 Q Was there a birthing scene during the 16:40:20
12 production of It Ends With Us? 16:40:27
13 A We had already shot the birthing scene 16:40:29
14 when he showed me that video. 16:40:32
15 Q And did he tell you why he was showing you 16:40:34
16 the video? 16:40:36
17 A No. 16:40:37
18 Q And he just showed it to you without 16:40:38
19 explaining anything about it? 16:40:42
20 A Yes. 16:40:43
21 Q And you just looked at it and -- how long 16:40:44
22 did you look at it for? 16:40:48
23 ATTORNEY HUDSON: Objection. 16:40:49
24 A Very briefly. 16:40:51
25 Q "Very briefly" meaning two minutes, a 16:40:52

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1 minute? 16:40:57

2 A I stopped it as soon as I saw that there 16:40:57

3 was a naked woman he was showing me. Because I 16:40:59

4 didn't know what it was. There was no context. 16:41:02

5 He did not ask if I wanted to see it. He did not 16:41:05

6 ask for my consent. I asked if -- he told me it 16:41:08

7 was his wife giving birth. I asked if she had 16:41:12

8 given consent to share that with me. 16:41:16

9 Q And what did she say? 16:41:18

10 A She wasn't there. 16:41:22

11 Q What did he say that she said? 16:41:24

12 A "She's not weird about that kind of 16:41:26

13 stuff." 16:41:28

14 Q Did he tell you why he was showing it to 16:41:29

15 you? 16:41:31

16 A No. 16:41:31

17 Q You had no idea whatsoever why he was 16:41:33

18 showing it to you? 16:41:36

19 ATTORNEY HUDSON: Objection. 16:41:37

20 A No. There was no reason to show me that 16:41:38

21 that day. We were shooting in a Boston bar. 16:41:45

22 Q During the June 1st meeting that we were 16:41:50

23 just talking about attended by yourself, Jamey, 16:41:57

24 Justin and Alex Saks, during that meeting, did you 16:42:01

25 call the actions by Justin Baldoni sexual 16:42:07

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1 harassment? 16:42:10

2 A What actions? 16:42:12

3 Q The actions that you raised at that 16:42:15

4 June 1st meeting. 16:42:19

5 ATTORNEY HUDSON: Objection. 16:42:20

6 A I don't believe he would have said to a 16:42:21

7 man, it's not his fault, it's mine, "I thought you 16:42:29

8 wanted to see it," without acknowledgment or 16:42:34

9 apology or reparations or -- no, I do feel that I 16:42:36

10 was treated differently. 16:42:40

11 Q Yeah, I just want to know what you said at 16:42:42

12 the meeting. 16:42:44

13 So I'm asking you during that June 1st 16:42:45

14 meeting, did you call the actions by Justin 16:42:47

15 Baldoni sexual harassment at that meeting? 16:42:51

16 A Which actions? 16:42:54

17 Q Any actions that he had -- that you had 16:42:55

18 raised at that June 1st meeting. 16:42:58

19 ATTORNEY HUDSON: Objection. 16:43:00

20 A I remember discussing the video that Jamey 16:43:03

21 showed me. I remember discussing the -- Jamey 16:43:13

22 entering my trailer. And I remember -- I don't 16:43:22

23 know if I told him this or if this is another 16:43:29

24 thing that Ange shared, but how bad it felt for 16:43:33

25 him to tell me personally that I felt sex -- that 16:43:40

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1 I looked sexy and that I looked hot, and that I 16:43:43
2 was also disturbed by the way that I understood 16:43:49
3 Jenny to be feeling and experiences I'd seen with 16:43:56
4 her. 16:44:00

5 Q During the June 1st meeting, did you call 16:44:00
6 the actions by Justin sexual harassment? Did you 16:44:07
7 use that term? 16:44:11

8 A I remember using the word "HR claims." 16:44:12

9 Q HR what? 16:44:18

10 A "Claims." 16:44:19

11 Q Claims. 16:44:20

12 During the meeting on June 1st, did you 16:44:21
13 call the actions by Jamey sexual harassment? 16:44:24

14 ATTORNEY HUDSON: Objection. 16:44:29

15 A I think the actions that I'm describing 16:44:30
16 are pretty obviously sexual harassment. 16:44:35

17 Q I'm asking you whether you actually called 16:44:41
18 them that at the meeting that was attended by 16:44:43
19 these people. 16:44:46

20 A Like I said, I don't -- -- 16:44:47

21 ATTORNEY HUDSON: Objection. 16:44:49

22 A -- remember what words were used because I 16:44:49
23 never intended to talk to them about it -- 16:44:54

24 Q All right. 16:44:57

25 A -- themselves. I intended to formally 16:44:59

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1 I would do a Colleen Hoover film, because the 17:34:12
2 narrative or the sentiment was that this book 17:34:18
3 romanticized and sexualized, more specifically, 17:34:28
4 not romanticized, but sexualized domestic 17:34:30
5 violence. 17:34:33

6 Q And does negative press bother you? 17:34:34

7 ATTORNEY HUDSON: Objection. 17:34:38

8 A I'm used to it after this many years in 17:34:43
9 the industry, but it's not something I've had to 17:34:48
10 deal with often. 17:34:53

11 Q Well, I mean, it's true that you dealt 17:34:58
12 with negative press with respect to being married 17:35:01
13 on a plantation during, kind of, the height of 17:35:04
14 Black Lives Matter; is that right? 17:35:07

15 ATTORNEY HUDSON: Objection. 17:35:09

16 A It's true that I dealt with negative press 17:35:09
17 during that. I was not married then. And I feel 17:35:13
18 like that negative press was deserved. It's a 17:35:18
19 mistake we have publicly acknowledged and done a 17:35:22
20 lot of work to reconcile for ourselves and others. 17:35:32

21 Q And just to be clear, you're not alleging 17:35:36
22 that anything related to the plantation wedding is 17:35:40
23 part of the smear campaign; is that correct? 17:35:44

24 ATTORNEY HUDSON: Objection. 17:35:47

25 A No. 17:35:50

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1 ATTORNEY HUDSON: Objection. 19:02:35

2 A No, that's not what I'm saying. 19:02:36

3 Q Okay. I didn't think so. I just wanted 19:02:37

4 to be clear. 19:02:39

5 All right. I just want to get a timeline 19:02:40

6 of things. 19:02:48

7 The production started in early May of 19:02:49

8 2023, is that right, of the movie it ends with us? 19:02:51

9 A The filming itself started, I believe, 19:02:56

10 yeah, in May of 2023. 19:02:58

11 Q Okay. And was that in California? 19:02:59

12 A No, it was in New Jersey. 19:03:04

13 Q Oh, I thought everything was in 19:03:09

14 California. 19:03:10

15 Okay. And then there was a writers' 19:03:11

16 strike that stopped it in June of '23 -- 2023, 19:03:16

17 correct? 19:03:24

18 A Correct. 19:03:25

19 Q And then production resumed maybe on 19:03:26

20 January 5th of 2024; is that right? 19:03:33

21 A That sounds correct. 19:03:35

22 Q Okay. Was that also in New Jersey or was 19:03:36

23 that in California? 19:03:38

24 A That was in New Jersey. We shot a couple 19:03:39

25 days in California at the end. 19:03:42

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1	When Mr. Freedman allegedly made these	19:21:17
2	defamatory comments on behalf of Mr. Wallace, did	19:21:20
3	he make them prior to the lawsuit -- to that	19:21:25
4	lawsuit, which has now been dismissed, being sent	19:21:29
5	to New York?	19:21:32
6	ATTORNEY HUDSON: Objection.	19:21:32
7	Q How about that?	19:21:33
8	ATTORNEY HUDSON: Objection.	19:21:36
9	A My understanding is that Mr. Freedman's	19:21:37
10	harmful statements started as soon as the first	19:21:45
11	case started, which would be mine. So December of	19:21:55
12	2024.	19:22:01
13	Q Okay. The premiere of it ends with us,	19:22:01
14	the film, was on August 6th of 2024; is that	19:22:16
15	right?	19:22:22
16	A I don't know the exact date, but that	19:22:22
17	sounds correct.	19:22:24
18	Q Okay.	19:22:25
19	ATTORNEY BABCOCK: Have you got 1051?	19:22:27
20	I may have a document that might help.	19:22:29
21	THE WITNESS: Thanks.	19:22:32
22	ATTORNEY BABCOCK: You can -- attach that	19:22:34
23	one.	19:22:38
24	(Exhibit 1051, marked for identification.)	19:22:38
25	BY ATTORNEY BABCOCK:	19:22:57

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1 Q 1051, if you go to the fourth page, next 19:22:57
2 to last page, it says, "Tuesday, August 6th, 19:23:06
3 7:00 P.M., it ends with us premiere, location AMC 19:23:12
4 Lincoln Square, 1998 Broadway, New York, 19:23:16
5 New York." 19:23:20

6 Does that refresh your recollection as to 19:23:20
7 when the premiere was? 19:23:23

8 A Sorry, I wasn't there yet. 19:23:24

9 This is 8981? Tuesday, August 6th, it 19:23:26
10 ends with us premiere. Yes. 19:23:33

11 Q Okay. And the -- the film's release was 19:23:35
12 on August 9th; is that right? 19:23:43

13 A In the United States, yes. It released at 19:23:45
14 different times in different international 19:23:51
15 territories. But for the sake of our 19:23:52
16 conversations today, when I've talked about the 19:23:55
17 day the film was released, I was talking about 19:23:59
18 August 9th. 19:24:01

19 Q Okay. And you testified earlier that that 19:24:02
20 was when you first became aware of the negative 19:24:03
21 argument or the -- sorry, the negative article 19:24:07
22 about you, right? 19:24:12

23 ATTORNEY HUDSON: Objection. 19:24:13

24 A Not an article, no. It felt -- no, not 19:24:13
25 one article. 19:24:22