

EXHIBIT 68

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

1	BLAKE LIVELY,)	
2)	
3	PLAINTIFF)	CASE NO.
4)	1:24-CV-10049-LJL
5	VS.)	(CONSOLIDATED WITH
6)	1:25-CV-00449-LJL
7	WAYFARER STUDIOS LLC,)	
8	JUSTIN BALDONI, JAMEY)	
9	HEATH, STEVE SAROWITZ,)	
10	IT ENDS WITH US MOVIE)	
11	LLC, MELISSA NATHAN,)	
12	THE AGENCY GROUP PR)	
13	LLC, AND JENNIFER ABEL,)	
14	DEFENDANTS)	
15	_____)	_____
16	JENNIFER ABEL,)	
17	THIRD-PARTY)	
18	PLAINTIFF)	
19)	
20	VS.)	
21)	
22	JONESWORKS LLC)	
23	THIRD-PARTY)	
24	DEFENDANT)	

ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE
OCTOBER 10
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ORAL AND VIDEOTAPED DEPOSITION OF JED WALLACE,
produced as a witness at the instance of the Jonesworks
and duly sworn, was taken in the above styled and
numbered cause on Friday, October 10, 2025, from 9:06
a.m. to 2:25 p.m., before Janalyn Elkins, CSR, in and
for the State of Texas, reported by computerized
stenotype machine, at the offices of Jackson Walker, 100
Congress Avenue, Suite 1100, Austin, Texas, pursuant to
the Federal Rules of Civil Procedure and any provisions
stated on the record herein.

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<p>1 APPEARANCES</p> <p>2 FOR BLAKE LIVELY:</p> <p>3 MICHAEL J. GOTTLIEB</p> <p>4 MELISSA TAUSTINE</p> <p>5 AARON E. NATHAN</p> <p>6 WILKIE FARR & GALLAGHER LLP</p> <p>7 1875 K Street NW</p> <p>8 Washington, DC 20006</p> <p>9 Tel: (202) 303-1000</p> <p>10 Mgottlieb@wilkie.com</p> <p>11 AND</p> <p>12 LAURA PRATHER</p> <p>13 HAYNES AND BOONE, LLP</p> <p>14 98 San Jacinto Boulevard, Suite 1500</p> <p>15 Austin, Texas 78701</p> <p>16 Tel: (512) 867-8400</p> <p>17 Laura.prather@haynesboone.com</p> <p>18 FOR JED WALLACE:</p> <p>19 CHARLES L. BABCOCK</p> <p>20 JACKSON WALKER, LLP</p> <p>21 1401 McKinney, Suite 1900</p> <p>22 Houston, Texas 77010</p> <p>23 Tel: (713) 752-4210</p> <p>24 cbabcock@jw.com</p> <p>25 FOR JONESWORKS, LLC</p> <p>26 KRISTIN TAHLER</p> <p>27 MORGAN ANSTASIO</p> <p>28 QUINN EMANUEL URQUHART & SULLIVAN, LLP</p> <p>29 865 Figueroa Street, 10th Floor</p> <p>30 Los Angeles, California 90017</p> <p>31 Tel: (213) 443-3000</p> <p>32 kristintahler@quinnemanuel.com</p> <p>33 FOR WAYFARER STUDIOS, LLC, JUSTIN BALDONI, JAMEY HEATH,</p> <p>34 STEVE SAROWITZ, IT ENDS WITH US MOVIE LLC, MELISSA</p> <p>35 NATHAN, JENNIFER ABEL, AND THE AGENCY GROUP PR, LLC</p> <p>36 MILES COOLEY</p> <p>37 THERESA TROUPSON</p> <p>38 LINER FREEDMAN TAITELAN & COOLEY, LLP</p> <p>39 1801 Century Park West, 5th Floor</p> <p>40 Los Angeles, California 90067</p> <p>41 Tel: (310) 201-0045</p> <p>42 mcooley@lftcllp.com</p>	<p>1 INDEX</p> <p>2 PAGE</p> <p>3</p> <p>4 Appearances 2</p> <p>5 Stipulations 5</p> <p>6 JED WALLACE</p> <p>7 Examination by Ms. Tahler 7</p> <p>8 Reporter's Certificate..... 155</p> <p>9</p> <p>10 EXHIBITS</p> <p>11 NO. DESCRIPTION PAGE</p> <p>12 Exhibit 42 Holding Clients Hostate: Stephanie Jones Leaks 38</p> <p>13 Exhibit 43 Stephanie Leaks Jones Leaks 38</p> <p>14 Exhibit 44 @lyingstephjoness X Account Suspended 38</p> <p>15 Exhibit 45 Facebook Stephanie Jones Leaks 38</p> <p>16 Exhibit 46 Pinterest Stephanie Jones 38</p> <p>17 Exhibit 47 La Foret Sacree 58</p> <p>18 Exhibit 48 Accompagnements Formatifs Pour Les Equipes Du Secteur Public 58</p> <p>19 Exhibit 49 Reagissons.colibris-lemouvement.org 58</p> <p>20 Exhibit 50 Yoga Poesie 58</p> <p>21 Exhibit 51 Amanda Ghost is a Destroyer of Worlds 71</p> <p>22 Exhibit 52 Text Message 76</p> <p>23 Exhibit 53 Audio Transcript 79</p> <p>24 Exhibit 54 Phone Records 94</p> <p>25 Exhibit 55 X Amanda Ghost 97</p> <p>26 Exhibit 56 Pinterest Amanda Ghost 97</p> <p>27 Exhibit 57 Facebook Amanda Ghost 97</p> <p>28 Exhibit 58 YouTube Amanda Ghost 97</p> <p>29 Exhibit 59 Tripadvisor Amanda Ghost 97</p> <p>30 Exhibit 60 Strikingly Amanda Ghost 97</p> <p>31 Exhibit 61 Colibris Le Mouvement 99</p>
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<p style="text-align: right;">Page 14</p> <p>1 privileged.</p> <p>2 Q. (BY MS. TAHLER) Let's -- what about Rebel</p> <p>3 Wilson? Did you ever do any work with Mr. Freedman in</p> <p>4 connection with Rebel Wilson?</p> <p>5 MR. COOLEY: Objection.</p> <p>6 THE WITNESS: Not that I recall.</p> <p>7 Q. (BY MS. TAHLER) You don't recall one way or</p> <p>8 another?</p> <p>9 A. I don't recall.</p> <p>10 Q. What about with Drake, did you do any work with</p> <p>11 Mr. Freedman in connection with Drake?</p> <p>12 MR. COOLEY: Objection.</p> <p>13 THE WITNESS: Not that I recall.</p> <p>14 Q. (BY MS. TAHLER) What about Michael Milosh?</p> <p>15 MR. COOLEY: Is there -- is there a</p> <p>16 question? What about him?</p> <p>17 Q. (BY MS. TAHLER) Did you do any work with</p> <p>18 Mr. Freedman in connection with Michael Milosh?</p> <p>19 MR. COOLEY: Objection.</p> <p>20 THE WITNESS: No.</p> <p>21 Q. (BY MS. TAHLER) Are you familiar with Dwayne</p> <p>22 Johnson?</p> <p>23 MR. COOLEY: Objection.</p> <p>24 THE WITNESS: In my -- the actor?</p> <p>25 Q. (BY MS. TAHLER) Yes.</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Like this, I'm talking.</p> <p>2 Q. When you are writing someone, what is your</p> <p>3 preferred method of communication?</p> <p>4 A. Depends on the circumstances.</p> <p>5 Q. Would you say that most of your communications</p> <p>6 that are work related are via Signal?</p> <p>7 A. It depends on the circumstances. I can't say</p> <p>8 that.</p> <p>9 Q. In what circumstances would Signal be your</p> <p>10 preferred method of communication?</p> <p>11 MR. BABCOCK: Objection.</p> <p>12 MR. COOLEY: Join.</p> <p>13 THE WITNESS: Could you -- could you</p> <p>14 rephrase that question?</p> <p>15 Q. (BY MS. TAHLER) Well, you just said it depends</p> <p>16 on the circumstances that would dictate the type of</p> <p>17 communication you were -- or the way that you were</p> <p>18 communicating. And I'm wondering in what circumstances,</p> <p>19 picking up on your answer, you would want to use Signal?</p> <p>20 A. Yeah, I can't speak to that right now without</p> <p>21 more details. I'm not certain.</p> <p>22 Q. Are there particular circumstances that are in</p> <p>23 your mind right now that you would want to have a</p> <p>24 conversation on Signal with respect to your work?</p> <p>25 MR. COOLEY: Objection.</p>
<p style="text-align: right;">Page 15</p> <p>1 A. Yes.</p> <p>2 Q. Did you do any work with Mr. Freedman in</p> <p>3 connection with Dwayne Johnson?</p> <p>4 MR. COOLEY: Objection.</p> <p>5 THE WITNESS: No.</p> <p>6 Q. (BY MS. TAHLER) Mr. Wallace, who is paying</p> <p>7 your legal fees in connection with this matter?</p> <p>8 A. That would be Wayfarer.</p> <p>9 Q. Do you have an indemnification agreement with</p> <p>10 them?</p> <p>11 MR. COOLEY: Objection.</p> <p>12 THE WITNESS: I'm not aware of anything</p> <p>13 like that.</p> <p>14 Q. (BY MS. TAHLER) You're not aware of any</p> <p>15 agreement you have with Wayfarer?</p> <p>16 MR. COOLEY: Objection.</p> <p>17 THE WITNESS: I'm not.</p> <p>18 Q. (BY MS. TAHLER) Are you being paid for any</p> <p>19 consulting services in connection with this matter?</p> <p>20 A. No.</p> <p>21 Q. Are you being compensated at all for your time</p> <p>22 as an expert in connection with this matter?</p> <p>23 A. Not whatsoever.</p> <p>24 Q. Mr. Wallace, what is your preferred method of</p> <p>25 communication for work?</p>	<p style="text-align: right;">Page 17</p> <p>1 THE WITNESS: Not in particular.</p> <p>2 Q. (BY MS. TAHLER) From time to time, you ask</p> <p>3 people to switch over to Signal; isn't that right?</p> <p>4 MR. COOLEY: Objection.</p> <p>5 THE WITNESS: I mean, I'd have to know more</p> <p>6 details.</p> <p>7 Q. (BY MS. TAHLER) Do you have any recollection</p> <p>8 of having a conversation with people and asking to</p> <p>9 switch over to Signal?</p> <p>10 A. I -- could you rephrase that question?</p> <p>11 Q. Yeah. Do you have any recollection of being on</p> <p>12 a text chain or an email chain with a group of people</p> <p>13 and asking to switch over to communication via Signal?</p> <p>14 A. Not specifically.</p> <p>15 Q. We're going to look at an exhibit that we</p> <p>16 looked at yesterday, which is AEO, but...</p> <p>17 MR. BABCOCK: Do we need to go AEO?</p> <p>18 MS. TAHLER: Yes.</p> <p>19 MR. BABCOCK: How do we do that?</p> <p>20 MS. TAHLER: I think we don't need to right</p> <p>21 now because there's nobody -- we'll just mark it AEO in</p> <p>22 the transcript.</p> <p>23 MR. BABCOCK: Okay.</p> <p>24 MS. ANASTASIO: Janalyn, do you have the</p> <p>25 exhibit copies from yesterday?</p>

5 (Pages 14 - 17)