

EXHIBIT 3

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Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

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4
5 BLAKE LIVELY,

6 Plaintiff,

7 vs.

CASE NO. 24-CV-10049-LJL (LEAD CASE)

25-CV-449 (LJL) (MEMBER CASE)

8
9 WAYFARER STUDIOS LLC, ET AL.

10 Defendants.

11 JENNIFER ABEL,

Third-party Plaintiff,

12 vs.

JONESWORKS, LLC,

Third-party Defendant.

13 WAYFARER STUDIOS LLC, et al.

14 Consolidated Plaintiffs,

15 vs.

BLAKE LIVELY, et al.

Consolidated Defendants.

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17
18 **CONFIDENTIAL**

19
20 VIDEO-RECORDED DEPOSITION OF JENNIFER ABEL

21 Los Angeles, California

22 Friday, September 26, 2025

23 Stenographically Reported by: Ashley Soevyn,
24 CALIFORNIA CSR No. 12019
25

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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.

JENNIFER ABEL,

Third-party Plaintiff,

vs.

JONESWORKS, LLC,

Third-party Defendant.

WAYFARER STUDIOS LLC, et al.

Consolidated Plaintiffs,

vs.

BLAKE LIVELY, et al.

Consolidated Defendants.

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Video-recorded Deposition of

JENNIFER ABEL, taken on behalf of the Plaintiff
Blake Lively, Pursuant to Notice, at the offices of
Willkie Farr & Gallagher, 2029 Century Park East,
Los Angeles, California beginning at 9:12 a.m. and
ending at 6:52 p.m. on Friday, September 26, 2025,
before me, ASHLEY SOEVYN, California Certified
Shorthand Reporter No. 12019.

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1 BY MR. GOTTLIEB:

2 Q Exhibit 57 is a document bearing the
3 Bates No. BALDONI_20412 through 20417. This appears
4 to be a text chain between you, Ms. Jones, Mr. Heath
5 and Mr. Baldoni, on November 10th, 2023?

6 A Yes.

7 Q And it starts around 9:53 p.m. and
8 concludes around 10:12 p.m.; is that right?

9 A Yes.

10 Q And do you recall this conversation?

11 A I do.

12 Q And in this conversation, Mr. Baldoni
13 reaches out and he says he needs you and Ms. Jones
14 on a Zoom, right?

15 A Yes.

16 Q And Mr. Heath says, "It begins again"?

17 A Yes.

18 MR. FREEDMAN: Are we missing a page
19 here? Goes from 2414 to 2416.

20 MS. TAUSTINE: It's this. It's the
21 picture of this bear.

22 MR. GOTTLIEB: It's missing an image from
23 the production. I will represent to you,
24 Mr. Freedman, it's a screenshot of this bear.

25 MR. FREEDMAN: I have that one here.

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1 MR. GOTTLIEB: Yeah.

2 MR. FREEDMAN: That's 24 -- that's 20413.

3 MR. GOTTLIEB: It's an entire page with
4 this reproduced on it.

5 BY MR. GOTTLIEB:

6 Q What did mister -- what did you
7 understand Mr. Heath to mean by saying, "It begins
8 again"?

9 A I mean, at the time, I don't think I
10 really gave that much notice. But now in this
11 context, I assume additional issues.

12 Q Do you see at 10:11, at the bottom of
13 page 0414, Mr. Heath has forwarded to you a legal
14 letter, a screenshot of a legal letter, anyway, that
15 had been received from Ms. Lively's lawyer?

16 A Yes.

17 Q And in it, Ms. Lively's lawyer discusses
18 the complaints of our clients and others?

19 A Uh-huh.

20 Q And do you see there is an attachment
21 that Mr. Heath had sent at 10:12 p.m.?

22 A Yes.

23 Q And that attachment is the protections
24 for return to production document, that is at
25 BALDONI_20416 and 20417?

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1 A Yes.

2 Q Do you recall receiving these 17
3 protections for return to production?

4 A Yes. He texted it to us.

5 Q Do you recall reviewing them at the time?

6 A Yes.

7 Q Did you review all of them?

8 A We had a phone call, and we talked
9 through these.

10 Q And, in fact, there came other points in
11 time later on in the timeline, when you talked about
12 these points with Mr. Heath and Mr. Baldoni, right?

13 A You're going to have to be a little bit
14 more specific.

15 Q This wasn't the last time --
16 November 10th, 2023 was not the last time you
17 looked at this 17-point list, right?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: Correct.

20 BY MR. GOTTLIEB:

21 Q Eventually, you all devised sort of
22 responses or points to address these, should they
23 ever become public, right?

24 MR. FREEDMAN: Objection.

25 THE WITNESS: I believe that we put

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1 your belief that that person could bury Ms. Lively?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: No.

4 BY MR. GOTTLIEB:

5 Q You sure?

6 A Yes.

7 Q Ms. Abel, yesterday you testified that in
8 some point in August of 2017, you were added to a
9 Signal chain; is that right?

10 A Sorry. What was the date?

11 Q At some point in -- did I say 2017?

12 THE STENOGRAPHIC REPORTER: Yeah.

13 BY MR. GOTTLIEB:

14 Q In August of 2024, you were added to a
15 Signal chain with a few people; is that right?

16 A I believe I testified that I think I was,
17 around that time frame. I don't think there was any
18 content in that text chain.

19 Q Okay. And who was -- hold on just a
20 second.

21 Who was -- who was on that text chain to
22 the best of your recollection?

23 A I believe it was -- I would have to --
24 I'd have to go back and refresh my memory.

25 Q Okay. You're not sure as you sit here

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1 today?

2 A I'm not sure.

3 Q Did you -- is it fair to say you didn't
4 use Signal very often?

5 A Correct.

6 Q You didn't open the app very much? It
7 wasn't something you used on a regular daily basis;
8 is that your testimony?

9 MR. FREEDMAN: Objection.

10 THE WITNESS: I believe my testimony
11 yesterday was I had to re-download it because the
12 only time that I used it was when Stephanie
13 introduced me to the app for use on another client.
14 And I had deleted it.

15 BY MR. GOTTLIEB:

16 Q You had deleted it.

17 And in August 20 -- August of 2024, at
18 some point, you reinstalled the app?

19 A I recall doing so, yes.

20 Q And you are on some chain that you don't
21 remember who was on it. And you don't remember
22 really what was sent or not sent?

23 A Correct.

24 Q Did you ever send a message on Signal in
25 August of 2024, to the best of your recollection?

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1 A I don't recall.

2 Q And the thing about that is, we'll never
3 know, right, because Signal is an ephemeral
4 messaging platform?

5 MR. FREEDMAN: Objection.

6 BY MR. GOTTLIEB:

7 Q Do you know what an ephemeral messaging
8 platform is?

9 MR. FREEDMAN: Objection.

10 THE WITNESS: I know the definition of
11 ephemeral messaging, yes.

12 BY MR. GOTTLIEB:

13 Q The messages delete after a certain
14 period of time if you have the settings set a
15 certain way, right?

16 A That is my understanding of how it works.

17 Q Sorry.

18 That's why some people like to use
19 Signal, right?

20 MR. FREEDMAN: Objection.

21 THE WITNESS: Sure.

22 BY MR. GOTTLIEB:

23 Q Because it -- messages delete and,
24 therefore, there's perceived privacy in those
25 communications?

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1 MR. FREEDMAN: Objection.

2 THE WITNESS: Amongst other reasons, yes.

3 BY MR. GOTTLIEB:

4 Q Security reasons?

5 A Yes.

6 Q Are you aware that Mr. Wallace was
7 communicating with your colleagues, or colleagues at
8 TAG or others at Wayfarer, using the Signal platform
9 in August of 2024?

10 A I don't recall if I was aware at the
11 time, but I have become aware of that since then.

12 Q Okay. What did you become aware of?

13 A The -- the usage of Signal amongst
14 Jed Wallace and other -- other people.

15 MR. GOTTLIEB: Okay. Let's look at
16 Exhibit 62.

17 (Exhibit 62 marked for identification.)

18 THE WITNESS: Thank you.

19 Q Ms. Abel, you've been handed a document
20 marked JONESWORKS 37247 through 37248, a text chain
21 between you and Stephanie Jones on June 17th,
22 2024.

23 Previously, I asked you if you had
24 recommended the retention of any other individuals
25 in this case because they could bury Ms. Lively.

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1 THE WITNESS: Yes.

2 BY MR. GOTTLIEB:

3 Q All I'm asking, Ms. Abel, is you didn't
4 tell anyone, don't look at my Signal messages,
5 right?

6 A No.

7 Q Okay. So if you had them, presumably --
8 and they were responsive, they would have been
9 produced to us, right?

10 MR. FREEDMAN: Objection.

11 THE WITNESS: I believe so, yes.

12 BY MR. GOTTLIEB:

13 Q And, again, Signal is a messaging
14 platform where messages delete after a certain
15 period of time, right?

16 MR. FREEDMAN: Objection.

17 THE WITNESS: Yes.

18 MR. GOTTLIEB: Handing you what's been
19 marked as Exhibit 70.

20 (Exhibit 70 marked for identification.)

21 BY MR. GOTTLIEB:

22 Q This is a document bearing the Bates Nos.
23 JONESWORKS 14019 through 14029.

24 And, Ms. Abel, I'm only going to be
25 asking you about questions starting with messages on

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1 your email accounts?

2 A I -- I don't -- I don't know.

3 Q Do you know, for example, whether your
4 RWA email account deletes information after a
5 certain period of time?

6 A I do not know.

7 Q Did you ever, at any point, go check
8 whether the RWA account has an auto delete feature
9 on it?

10 A I don't believe it does, but I did not
11 specifically check.

12 Q Did you ever receive an instruction to
13 discontinue any deletion, auto delete functions that
14 might exist on your accounts?

15 MR. FREEDMAN: Objection. I will
16 instruct you not to answer as to any communications
17 you had with counsel. Other than counsel, did you
18 get an instruction from someone?

19 THE WITNESS: No.

20 BY MR. GOTTLIEB:

21 Q Did you come to understand at any time,
22 Ms. Abel, that you had an obligation to preserve
23 documents relating to the dispute between Ms. Lively
24 and Mr. Baldoni?

25 MR. FREEDMAN: Same instruction as it

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1 will invade the attorney-client privilege. So even
2 if you're going to say yes to that, that's going to
3 invade the attorney-client privilege. So you're not
4 going to -- I'm going to instruct her not to answer.

5 MR. GOTTLIEB: About the simple fact of
6 whether she knew she was required to preserve
7 documents?

8 MR. FREEDMAN: Yeah, because the simple
9 fact is revealing the actual privileged
10 communication.

11 MR. GOTTLIEB: Okay.

12 BY MR. GOTTLIEB:

13 Q So are you going to follow your counsel's
14 instruction?

15 A Yes, I'm going to follow my counsel's
16 instruction.

17 Q Okay.

18 Other than the Signal thread that you --
19 that we talked about earlier in August, between
20 August and December of 2024, can you think of any
21 other Signal thread or Signal communications that
22 you sent or received to anyone about anything?

23 A Not that I can recall, no.

24 Q Okay. Have you had Signal communications
25 since December of 2024?

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1 A December 2024 until now?

2 Q Yes.

3 A Yes.

4 Q And how many different Signal chains or
5 threads do you have going at any one time now?

6 A I -- I don't recall. I don't know.

7 Q Have those Signal communications included
8 communications about the issues in this case?

9 A To clarify, I have with my attorneys.

10 Q Okay. Have any of those communications
11 been about the press?

12 A I don't recall.

13 Q Have you communicated with Mr. Wallace on
14 Signal at any time from December of 2024 to the
15 present?

16 A With inclusion of my attorneys.

17 Q So the answer is yes?

18 A Yes. With inclusion of my attorneys.

19 Q Okay. Have you communicated with
20 Mr. Wallace outside of any threads including your
21 attorneys?

22 A Not that I can recall.

23 Q Have -- since the lawsuit was filed, have
24 you taken any steps -- not talking about any
25 conversations or advice you have received -- but

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1 have you taken any steps personally to ensure that
2 your communications are preserved?

3 MR. FREEDMAN: Other than what you've
4 learned from counsel, you can answer, if you've
5 taken steps outside of what we discussed.

6 THE WITNESS: I've produced documents as
7 requested.

8 MR. GOTTLIEB: Mr. Freedman, she can
9 testify about what she's done, even if she's
10 discussed what she's done with you. That's clearly
11 not privileged.

12 BY MR. GOTTLIEB:

13 Q And so my question is: Can you think of
14 anything that you have done -- I don't want to know
15 about what you talked to your lawyers about. But
16 can you think of anything you have done, any steps
17 you have taken outside of conversations you've had
18 with counsel, but actual things you've done to
19 preserve your documents, your electronic
20 communications in this case?

21 A Yes. And I apologize, I thought I
22 answered. I've produced everything as requested.

23 Q Okay. So my question is a little bit
24 different. So --

25 A Okay.

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1 Q -- I understand you're saying you
2 produced what you found. My question is: At any
3 point in time, do you have a recollection of taking
4 steps to ensure that nothing would be deleted, no
5 auto delete functions would be on, no messages would
6 expire from a set period of time or the like,
7 anything like that?

8 MR. FREEDMAN: Same instruction as to
9 attorney-client privilege. If you can answer it
10 outside of that, you can answer it.

11 THE WITNESS: Yeah, I don't think I can
12 answer it.

13 BY MR. GOTTLIEB:

14 Q Are you aware that you have produced four
15 Signal communications to us in this case?

16 MR. FREEDMAN: Again, if you're aware of
17 it based on something you learned from counsel, I
18 would like you not to provide that information. If
19 you're aware of it some other way, you can answer.

20 THE WITNESS: I'm not aware of it any
21 other way.

22 BY MR. GOTTLIEB:

23 Q Do you know that there are Signal
24 communications that you have been copied on that
25 have been produced to us in this case that you have

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1 not produced to us in this case?

2 MR. FREEDMAN: Objection.

3 THE WITNESS: No.

4 BY MR. GOTTLIEB:

5 Q Did you have Signal communications with
6 Sage Steele in early January of 2025?

7 A I don't recall by Signal.

8 Q But you had some communications that you
9 recall with Sage Steele in early January 2025?

10 A Yes, I -- I recall Sage had reached out
11 to us. She -- this case personally resonated with
12 her. I believe she had a brother who was falsely
13 accused, and she expressed interest in wanting to
14 support in our defense.

15 Q And do you know that you had Signal
16 communications with Ms. Koslow and Ms. Nathan in
17 January of 2025 that did not include your attorneys?

18 MR. FREEDMAN: Objection.

19 THE WITNESS: In -- in January? I don't
20 recall.

21 BY MR. GOTTLIEB:

22 Q Okay. But your testimony is you've
23 produced to us everything that could be found in
24 your phone that was responsive to our request,
25 right?

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REPORTER'S CERTIFICATE

I, ASHLEY SOEVYN, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; at which time the witness was put under oath by me;

That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That a review of the transcript by the deponent was/ was not requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Dated this 27th day of September, 2025.



ASHLEY SOEVYN

CSR No. 12019

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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