

# Exhibit 1

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3  
4 BLAKE LIVELY,  
5 Plaintiff,  
6 - against -  
7 WAYFARER STUDIOS LLC,  
8 Defendant.

9 WAYFARER STUDIOS LLC, et al.,  
10 Plaintiffs,  
11 - against -  
12 BLAKE LIVELY, et al.  
13 Defendants.

14  
15 NEW YORK TIMES VIDEO  
16 "THE WAGING OF AN ALLEGED SMEAR  
17 CAMPAIGN AGAINST BLAKE LIVELY"  
18  
19

20 Job No.: 575706  
21 Pages: 1 - 6  
22 Transcribed by: Christian Naaden

## Transcript of Investigation Video

## 1 P R O C E E D I N G S

2 Megan Twohey: The movie It Ends With Us,  
3 starring Blake Lively, was a huge box office hit, even  
4 as rumors spread of turmoil behind the scenes. In a  
5 legal complaint Lively filed on Friday, private text  
6 messages and other documents that we've obtained reveal  
7 what really happened.

8 A campaign to tarnish Lively after she alleged  
9 that Justin Baldoni, her costar and director, and Jamey  
10 Heath, the producer, had engaged in misconduct while  
11 shooting the film, a story about breaking the  
12 generational cycle of domestic violence, among other  
13 allegations.

14 Lively claimed that Baldoni had engaged in  
15 improvised and unwanted kissing, and made sexual  
16 comments to her, and that Mr. Heath had shown her  
17 pictures of his wife naked, and that he had watched her  
18 while she was topless getting makeup removed, even as  
19 she had asked him to look away.

20 She had taken her complaints to the film  
21 studio and the men agreed to bring in a full time  
22 intimacy coordinator, an outside producer, and put in

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1 place other protections.

2 They also agreed in writing not to retaliate  
3 against her, but as the release of the movie  
4 approached, they hired a crisis PR manager who  
5 orchestrated a smear campaign against Lively.

6 The PR expert Melissa Nathan has represented  
7 clients including Johnny Depp and the rapper Drake.  
8 Nathan came up with a document spelling out her plans,  
9 but Baldoni wanted more.

10 A publicist who had already been working with  
11 Baldoni wrote to Nathan, he wants to feel like she can  
12 be buried. You know, we can bury anyone, Nathan wrote.  
13 But I can't write that to him.

14 In one message to the publicist, Nathan  
15 indicated that she had gotten allegations against  
16 Baldoni removed from articles. He doesn't realize how  
17 lucky he is right now. The whispering in the ear, the  
18 sexual connotations, she wrote. I mean, there's just so  
19 much.

20 At the same time, Nathan assembled a team that  
21 could dominate social media through full social account  
22 takedowns, by starting threads of theories and

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1 generally working to change the narrative, it's  
2 impossible to know how much they planted and how much  
3 of it was originating organically.

4 Whatever the case, they seized on it and  
5 amplified it. Sony, the film distributor, had signed  
6 off on a promotion plan that instructed the cast to  
7 focus not on domestic violence, but on the uplifting  
8 message of the film.

9 Blake Lively: It Ends With Us is in theaters  
10 now, so grab your friends, wear your florals and head  
11 out to see it.

12 Megan Twohey: Which some online observers  
13 said was tone deaf. The team discussed how online  
14 criticisms of Miss Lively could help narrative wise  
15 emails referred to social manipulation and proactive  
16 fan posting.

17 Text messages cited efforts to amplify and  
18 boost online content that was critical of Lively and  
19 favorable to Baldoni, and within days they were talking  
20 about how the online conversation had shifted. In one  
21 message to the publicist, Nathan wrote, socials are  
22 really, really ramping up in his favor. She must be

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1                   furious.

2                   It's actually sad because it just shows you  
3                   have people really want to hate on women. The shift in  
4                   online sentiment was unusual enough that a digital  
5                   marketing consultant produced a report that August that  
6                   concluded that Lively was being subjected to a  
7                   targeted, multi-channel online attack.

8                   In a statement, a lawyer for Baldoni, the  
9                   studio and all its representatives denied the  
10                   allegations. There are a variety of methods that have  
11                   long been used to shape public opinion about  
12                   celebrities gossip columns, tabloids, strategic  
13                   interviews.

14                   But this story reveals a new playbook for  
15                   waging a far reaching and largely undetectable smear  
16                   campaign in the digital age.

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1 CERTIFICATE OF TRANSCRIBER

2 I, Chris Naaden, a transcriber, hereby declare  
3 under penalty of perjury that to the best of my ability  
4 from the audio recordings and supporting information;  
5 and that I am neither counsel for, related to, nor  
6 employed by any of the parties to this case and have no  
7 interest, financial or otherwise, in its outcome, the  
8 above 6 pages contain a full, true and correct  
9 transcription of the tape-recording that I received  
10 regarding the event listed on the caption on page 1.

11

12 I further declare that I have no interest in  
13 the event of the action.

14

15



16

17

March 10, 2025

18

Chris Naaden

19

20

(575706, NYT Video The Waging of an Alleged Smear  
21 Campaign Against Blake Lively)

22

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A	approached 3:4 articles 3:16 asked 2:19 assembled 3:20 attack 5:7 audio 6:4 august 5:5 away 2:19	C	conversation 4:20 coordinator 2:22 correct 6:8 costar 2:9 could 3:21, 4:14 counsel 6:5 court 1:1 crisis 3:4 critical 4:18 criticisms 4:14 cycle 2:12
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2:6	<b>financial</b>	2:3	1:4, 1:12,
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2:12, 4:7	<b>florals</b>	<b>impossible</b>	2:8, 2:14, 3:5,
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3:21	<b>focus</b>	<b>improvised</b>	5:6, 6:21
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3:7	<b>friday</b>	<b>including</b>	1:7, 1:9
<b>E</b>		3:7	<b>long</b>
<b>ear</b>	<b>friends</b>	<b>indicated</b>	5:11
3:17	4:10	3:15	<b>look</b>
<b>efforts</b>	<b>full</b>	<b>information</b>	2:19
4:17	2:21, 3:21, 6:8	6:4	<b>lucky</b>
<b>emails</b>	<b>furious</b>	<b>instructed</b>	3:17
4:15	5:1	4:6	<b>M</b>
<b>employed</b>	<b>further</b>	<b>interest</b>	<b>made</b>
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