

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

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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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CERTIFICATE OF TRANSCRIBER

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

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



March 10, 2025

Chris Naaden

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

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A	approached	C	conversation
ability	3:4	came	4:20
6:3	articles	3:8	coordinator
about	3:16	campaign	2:22
2:11, 4:20,	asked	1:17, 2:8, 3:5,	correct
5:11	2:19	5:16, 6:21	6:8
above	assembled	can't	costar
6:8	3:20	3:13	2:9
account	attack	caption	could
3:21	5:7	6:10	3:21, 4:14
action	audio	case	counsel
6:13	6:4	4:4, 6:6	6:5
actually	august	cast	court
5:2	5:5	4:6	1:1
after	away	celebrities	crisis
2:8	2:19	5:12	3:4
against	B	certificate	critical
1:6, 1:11,	baldoni	6:1	4:18
1:17, 3:3, 3:5,	2:9, 2:14, 3:9,	change	criticisms
3:15, 6:21	3:11, 3:16,	4:1	4:14
age	4:19, 5:8	chris	cycle
5:16	because	6:2, 6:18	2:12
agreed	5:2	christian	D
2:21, 3:2	been	1:22	days
al	3:10, 5:11	cited	4:19
1:9, 1:12	behind	4:17	deaf
all	2:4	claimed	4:13
5:9	being	2:14	declare
allegations	5:6	clients	6:2, 6:12
2:13, 3:15,	best	3:7	defendant
5:10	6:3	columns	1:8
alleged	blake	5:12	defendants
1:16, 2:8, 6:20	1:4, 1:12,	comments	1:13
already	1:17, 2:3, 4:9,	2:16	denied
3:10	6:21	complaint	5:9
also	boost	2:5	depp
3:2	4:18	complaints	3:7
among	box	2:20	digital
2:12	2:3	concluded	5:4, 5:16
amplified	breaking	5:6	director
4:5	2:11	connotations	2:9
amplify	bring	3:18	discussed
4:17	2:21	consultant	4:13
any	buried	5:5	distributor
6:6	3:12	contain	4:5
anyone	bury	6:8	district
3:12	3:12	content	1:1, 1:2
		4:18	

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document 3:8 documents 2:6 domestic 2:12, 4:7 dominate 3:21 drake 3:7 <hr/> E <hr/> ear 3:17 efforts 4:17 emails 4:15 employed 6:6 ends 2:2, 4:9 engaged 2:10, 2:14 enough 5:4 et 1:9, 1:12 even 2:3, 2:18 event 6:10, 6:13 expert 3:6 <hr/> F <hr/> fan 4:16 far 5:15 favor 4:22 favorable 4:19 feel 3:11 filed 2:5	film 2:11, 2:20, 4:5, 4:8 financial 6:7 florals 4:10 focus 4:7 friday 2:5 friends 4:10 full 2:21, 3:21, 6:8 furious 5:1 further 6:12 <hr/> G <hr/> generally 4:1 generational 2:12 getting 2:18 gossip 5:12 gotten 3:15 grab 4:10 <hr/> H <hr/> happened 2:7 hate 5:3 head 4:10 heath 2:10, 2:16 help 4:14 hereby 6:2 hired 3:4	hit 2:3 huge 2:3 <hr/> I <hr/> impossible 4:2 improvised 2:15 including 3:7 indicated 3:15 information 6:4 instructed 4:6 interest 6:7, 6:12 interviews 5:13 intimacy 2:22 <hr/> J <hr/> jamey 2:9 job 1:20 johnny 3:7 justin 2:9 <hr/> K <hr/> kissing 2:15 know 3:12, 4:2 <hr/> L <hr/> largely 5:15 lawyer 5:8 legal 2:5	listed 6:10 lively 1:4, 1:12, 1:17, 2:3, 2:5, 2:8, 2:14, 3:5, 4:9, 4:14, 4:18, 5:6, 6:21 llc 1:7, 1:9 long 5:11 look 2:19 lucky 3:17 <hr/> M <hr/> made 2:15 makeup 2:18 manager 3:4 manipulation 4:15 march 6:17 marketing 5:5 mean 3:18 media 3:21 megan 2:2, 4:12 melissa 3:6 men 2:21 message 3:14, 4:8, 4:21 messages 2:6, 4:17 methods 5:10 misconduct 2:10
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miss 4:14 more 3:9 movie 2:2, 3:3 much 3:19, 4:2 multi-channel 5:7 must 4:22	organically 4:3 originating 4:3 other 2:6, 2:12, 3:1 otherwise 6:7 out 3:8, 4:11 outcome 6:7 outside 2:22	private 2:5 proactive 4:15 produced 5:5 producer 2:10, 2:22 promotion 4:6 protections 3:1 public 5:11 publicist 3:10, 3:14, 4:21 put 2:22	represented 3:6 retaliate 3:2 reveal 2:6 reveals 5:14 right 3:17 rumors 2:4
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naaden 1:22, 6:2, 6:18 naked 2:17 narrative 4:1, 4:14 nathan 3:6, 3:8, 3:11, 3:12, 3:14, 3:20, 4:21 neither 6:5 new 1:2, 1:15, 5:14 nyt 6:20	P		sad 5:2 said 4:13 same 3:20 scenes 2:4 see 4:11 seized 4:4 sentiment 5:4 sexual 2:15, 3:18 shape 5:11 shift 5:3 shifted 4:20 shooting 2:11 shown 2:16 shows 5:2 signature-8g8ru 6:15 signed 4:5 smear 1:16, 3:5,
O		R	
observers 4:12 obtained 2:6 office 2:3 one 3:14, 4:20 online 4:12, 4:13, 4:18, 4:20, 5:4, 5:7 opinion 5:11 orchestrated 3:5	page 6:10 pages 1:21, 6:8 parties 6:6 penalty 6:3 people 5:3 perjury 6:3 pictures 2:17 place 3:1 plaintiff 1:5 plaintiffs 1:10 plan 4:6 plans 3:8 planted 4:2 playbook 5:14 posting 4:16 pr 3:4, 3:6	ramping 4:22 rapper 3:7 reaching 5:15 realize 3:16 really 2:7, 4:22, 5:3 received 6:9 recordings 6:4 referred 4:15 regarding 6:10 related 6:5 release 3:3 removed 2:18, 3:16 report 5:5 representatives 5:9	

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