

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, STEVE SAROWITZ, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, THE AGENCY GROUP PR LLC, a Delaware Limited Liability Company, JENNIFER ABEL, an individual,

Defendants.

Civ. Action No. 1:24-cv-10049-LJL  
(Consolidated for pretrial purposes with  
1:25-cv-00449-LJL)  
rel. 1:25-cv-00779-LJL

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, JENNIFER ABEL, an individual, and STEVE SAROWITZ, an individual,

Plaintiffs,

v.

BLAKE LIVELY, an individual, RYAN REYNOLDS, an individual, LESLIE SLOANE, an individual, VISION PR, INC., a New York corporation, and THE NEW YORK TIMES COMPANY, a New York corporation,

Defendants.

**FIRST AMENDED COMPLAINT**

Consolidated Plaintiffs/Defendants Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, It Ends With Us Movie LLC, Melissa Nathan, Jennifer Abel, and Steve Sarowitz (collectively, the “Wayfarer Parties”) for their First Amended Complaint against Consolidated Defendant/Plaintiff Blake Lively and Consolidated Defendants Ryan Reynolds, Leslie Sloane, Vision PR, Inc., and The New York Times Company (collectively, the “Lively Parties”) allege as follows:

### **GENERAL ALLEGATIONS**

1. The following is not a story the Wayfarer Parties ever wished to tell.<sup>1</sup> Unfortunately, Blake Lively (“Lively”) has unequivocally left them with no choice, not only to set the record straight in response to Lively’s accusations and The New York Times Company’s maliciously and recklessly propagated falsehoods, but also to put the spotlight on the parts of Hollywood that they have dedicated their careers to being the antithesis of. That task was always going to be an uphill battle. They never imagined they would encounter it to this degree.

2. Had Lively chosen to merely ride out the self-inflicted press catastrophe she faced in August 2024, the public would likely have moved on and never known the truth about her. They would have never known that she deliberately and systematically robbed the Wayfarer Parties Justin Baldoni (“Baldoni”) and Wayfarer Studios, LLC (“Wayfarer”) of their movie. No one except the parties involved would have known that she used threats and extortion to relegate the colleagues she once highly praised to a basement to sit out their own premiere, while she enjoyed the spotlight of a premiere and afterparty that was ultimately co-financed by both Wayfarer and Sony. She would have gotten away with these things and more, because Baldoni, focused entirely on seeing the film succeed, would have held his tongue, as he had through the year and a half that Lively tormented him, his family, and his partners.

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<sup>1</sup> In the interest of transparency, a complete timeline of the sequence of events alleged herein is attached hereto as Exhibit A and incorporated by reference in its entirety.

3. But Lively could not tolerate her publicly tainted image for even a moment, and further could not accept that it was entirely of her own making. She needed a scapegoat. And rather than admit and take accountability for her own mishaps, she chose to blame the Wayfarer Parties, in a malicious and unforgivably public manner. When she and Reynolds could not force Baldoni and Wayfarer to read a statement she and her representatives prepared, extorting them to “take accountability” in defense of Lively’s actions, she lay in wait for months, preparing to publicly attack Baldoni by falsely claiming that he had sexually harassed her. The same falsified stories she had calculatingly devised and used throughout the production of this film in order to take control were now being used publicly to destroy Baldoni and the Wayfarer Parties.

4. Lively stole Wayfarer’s movie, hijacked Wayfarer’s premiere, destroyed the Wayfarer Parties’ personal and professional reputations and livelihood, and aimed to drive the Wayfarer Parties out of business entirely. It further appears that Lively worked for months with the equally powerful *New York Times* to prepare a false and damaging narrative to deploy against the Wayfarer Parties. Not surprisingly, Lively prepared an administrative complaint with the Civil Rights Department in California (the “CRD Complaint”) in an attempt to use the litigation privilege to shield her behind-the-scenes conspiracy with the *New York Times*, but, upon information and belief, the CRD Complaint was filed only after the Lively Parties spent months feeding falsehoods to the *New York Times* intending that they be disseminated to damage the Wayfarer Parties. Lively delivered the CRD Complaint to the Wayfarer Parties over the Christmas holiday, and rather than promptly file a lawsuit, Lively, on information and belief, leaked the typically private CRD Complaint to the public, utilizing the *New York Times* as conduit for her revenge. This CRD Complaint—and, upon information and belief, the false information delivered to the *New York Times* before the CRD Complaint was filed—was rife with lies and doctored

“evidence.” Lively then waited eleven days to file suit against the Wayfarer Parties, in what seemed to be a desperate move after the public questioned why she had never filed a civil lawsuit. On information and belief, Lively never intended to file a civil lawsuit, which would have triggered the Wayfarer Parties’ right to discovery, including obtaining evidence and deposing Lively under oath. By the time Lively actually filed a lawsuit against the Wayfarer Parties, the damage to the Wayfarer Parties was done by virtue of Lively’s months of colluding with the *New York Times* on a false and malicious narrative unshielded by any privilege. Make no mistake: these actions were deliberate.

5. The Wayfarer Parties now have no choice but to fight back armed only with the truth—and the mountain of concrete evidence disproving Lively’s allegations. Heartbreakingly, a film that Baldoni envisioned years ago would honor the survivors of domestic violence by telling their story, with the lofty goal of making a positive impact in the world, has now been overshadowed beyond recognition solely as a result of Lively’s actions and cruelty.

6. Lively wields immense power as one of the world’s best-known celebrities. In 2024, she used that power to seize control of the Film “It Ends With Us” (the “Film”), produced and co-financed by Wayfarer and directed by Baldoni, who also portrayed the lead, “Ryle.” She set out to destroy the Wayfarer Parties’ livelihoods and businesses if they did not bend to her incessant demands, and when they refused to give way, she did exactly that, accusing them of foul and reprehensible sexual misconduct. Wayfarer was blindsided when Lively, upon the conclusion of the industry strikes, refused to return to production absent the company’s agreeing to her non-negotiable “Protections for Return to Production” (the “Return to Production Demands”) that insinuated misconduct had occurred during filming (which, as evidence will establish, did not). Wayfarer was equally blindsided when Lively leveraged this document, essentially signed under



duress, to seize control of the Film—ultimately getting her own cut of the Film and a coveted P.G.A mark and, at her command, ousting Baldoni from all marketing and promotional efforts with many of the cast members and the author, all of whom he, until then, had longstanding positive relationships with.

7. Lively’s exclusion of Baldoni from the promotion of the film backfired, as she chose to callously promote her hair care and alcoholic beverage products rather than bring attention to survivors of domestic violence, the entire premise of the Film. Baldoni, now prohibited from attending events or taking photos with Lively and the cast, promoted the film as he had always intended, ever since he first began the process of making the film years ago.

8. When Lively faced significant public backlash from what was often referred to as her “tone-deaf” and insensitive press tour for the Film, she doubled down on her false and misleading accusations against Baldoni. She seemed determined to make Baldoni the real-life villain in her story. Her publicist, Leslie Sloane (“Sloane”), went so far as to propagate malicious stories portraying Baldoni as a sexual predator (a term Lively’s husband, Ryan Reynolds, also used to describe Baldoni when he called Baldoni’s own agent). Modern society justly reviles sexual harassers and abusers, and Lively knew full well that making those allegations would be a career death sentence for the Wayfarer Parties, especially given that Baldoni has lived his private and public life as an impassioned advocate for gender equality and healthy masculinity. She did not expect, however, that the Wayfarer Parties would be able to meet those allegations with concrete documentary evidence disproving her claims and demonstrating that *they*—not Lively—were the targets of a calculated and vitriolic smear campaign. That evidence, included in part herein, is the basis for the Wayfarer Parties’ claims against the Lively Parties for their extortion, defamation, and further wrongdoing.

9. The Film was the hotly anticipated adaptation of a worldwide best-selling book by Colleen Hoover, and by starring in it as “Lily,” Lively stood to enhance her already considerable star power. But she was not content merely to headline one of the year’s biggest movies. Instead, apparently driven by overweening ambition and a need for control<sup>2</sup>, Lively eventually leveraged her power as a wealthy celebrity to wrest the reins from her costar and the Film’s director, Baldoni, insisting on total control over every aspect of the Film she could get her hands on, from wardrobe to marketing strategy to music, even creating her own cut of the Film. Not only did Lively’s power play cost numerous people their jobs, but at every turn, her wrongheaded creative decisions reflected her fundamental lack of understanding of the book the Film was based on. This came as no surprise to her worried colleagues, given that, even well into production, Lively *had not even read the book*.<sup>3</sup>

*September 14, 2023 text message from Baldoni to Heath:*

that we are rooting to see her fulfill). After rereading the book (which had 150 pages to build their relationship), we have combined scenes to heighten the stakes for Ryle in pursuit of Lily, utilizing humor and his desire to sleep with her. While I understand Blake’s reasons for not wanting to read the book, the book does a very good job in getting in Lily’s mind during her interactions with Ryle and setting up the WHY behind her attraction to him, which ultimately helps us understand why she stays in the end.

10. Lively’s disastrous marketing efforts and tone-deaf press interviews and appearances backfired and led to widespread criticism of Lively’s promotional approach to the Film’s highly sensitive focus on domestic violence. Past videos of Lively resurfaced online—videos that appeared to solidify public perception that Lively was an insensitive “mean girl” who cared more about peddling her products than acknowledging the domestic violence survivor

<sup>2</sup> In an early meeting with Baldoni, Lively foreshadowed what was to come, stating, “*I’m afraid you have too much power*,” referencing Baldoni’s dual role as producer and director. This statement made an early impact on Baldoni, who felt compelled to reassure her the relationship would be collaborative and went above and beyond to make it so. This was not an invitation to sideline him and his producing partners.

<sup>3</sup> Lively later claimed she read the book, but text evidence shows that well into production she had not, and in fact expressed she had *chosen* not to read the book. She even tried to “Google” the color of her character’s hair rather than pick up the book.

community. Social media commenters quickly pointed out that her tie-in of her alcohol beverages was in particularly poor taste, given the World Health Organization estimates that 55% of domestic violence incidents are linked to alcohol. Unbelievably, Lively made this harmful and irresponsible message worse by naming a drink at her premiere afterparty “Ryle You Wait,” after the character who committed domestic violence in the Film. The suggestion that Wayfarer caused the online backlash against her is absurd given the evidence of her own insensitivity.

11. Sadly, this backlash could have been avoided had she not refused to meet with the Film’s domestic violence partner organization, [nomore.org](https://nomore.org), as Baldoni had offered. Even a brief visit to their website, or a simple online search, would have readily uncovered this and other information on the topic of domestic violence.

12. Meanwhile, Baldoni, whom *Lively herself* had ensured was excluded from participating in her marketing efforts, was safeguarded from this backlash as he focused on amplifying the voices of those affected by domestic violence, as originally intended when he reached out to author Colleen Hoover five years earlier, and documented by his partnership with [nomore.org](https://nomore.org) dating back to 2022. Baldoni’s sincere efforts were well received, even more so in contrast with Lively’s campaign to downplay the premise of the film and sell haircare and alcohol products. Lively, enraged that her plans were foiled and armed with “proof” of alleged sexual harassment in the form of a 17-point list of demands she had required the Wayfarer Parties to sign just months earlier, focused her rage on Baldoni, blaming him for the consequences of her own missteps.

13. Meanwhile, Stephanie Jones (“Jones”), founder of Jonesworks LLC (“Jonesworks”), Wayfarer’s and Baldoni’s erstwhile PR firm, was embroiled in a personal and professional crisis. Her increasingly erratic behavior had driven away not only high-profile clients,

but also her right-hand woman, Jennifer Abel (“Abel”), who oversaw the Jonesworks Los Angeles office. Jones’ behavior grew more and more bizarre as she lashed out at loyal clients like Wayfarer in rage-filled rants, and veered away from professional experience and strategy when making critical decisions affecting Jonesworks clients. After a final outburst against Wayfarer in which she outright refused to comply with their direct instructions, Wayfarer had no choice but to cut ties with Jones and Jonesworks rather than leave their public image in the hands of what appeared to be an out-of-control Jones, whose actions were not aligned with Wayfarer and Baldoni’s worldview and wishes. Jones was filled with impotent rage at Wayfarer and at Abel, who a month before had announced her decision to leave Jonesworks to form her own company. Jones saw an opportunity for revenge. She took it.

14. On information and belief, Jones, Lively, Reynolds, and Leslie Sloane (“Sloane”), Lively’s publicist, and others concocted a plan whereby Jones would seize Abel’s phone upon her departure<sup>4</sup> and mine it for messages that, stripped of context, could be used to concoct a false narrative that the disastrous press coverage of Lively’s callous and opportunistic comments—and the public reaction to those comments—were not Lively’s fault at all, but the result of a calculated (though in reality, nonexistent) smear campaign by Baldoni and his team. On information and belief, Jones’ role in this scheme accounts for her conspicuous absence from Lively’s re-telling of events. The Wayfarer Parties are informed and believe that the Lively Parties have been working in concert since at least August 21, 2024, when Sloane boasted to Nathan that she had seen her texts and that Nathan would soon be sued.

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<sup>4</sup> While it is not entirely uncommon to request that an exiting employee return company property, it is not often the case that personal phones, phone numbers, and communications are seized, made public, and weaponized against the employee and the company’s own clients.

15. Though Lively claimed Baldoni was the one smearing her, the reality is that it was *Lively* and her team who carefully planned and implemented a vile smear campaign against Baldoni and Wayfarer to deflect attention and blame for Lively’s disastrous misjudgments. Lively would recast herself as the long-suffering martyr by portraying Baldoni and Wayfarer as her persecutors: the masterminds behind a smear campaign that evidence will show did not exist. Sloane of Vision PR (“Vision”) was all too willing to carry out this strategy—especially once armed with ammunition by Jones, who was bent on revenge against her ex-employee and former client.

16. Shortly after the Film’s premiere and the public backlash against Lively, Lively, together with her husband, Ryan Reynolds (“Reynolds”), demanded through their talent agency, which also represented Wayfarer and Baldoni, that the Wayfarer Parties *publicly apologize* for so-called “mistakes” during production in order to deflect the avalanche of negative media coverage of Lively. Reynolds and Lively drafted a statement and demanded that Baldoni, Wayfarer, and Heath issue that statement, requiring them to apologize to the public and fall on their sword, despite having done nothing wrong—or else the “gloves would come off.” Multiple WME executives acknowledged that in their experience, Lively and Reynolds’ threats were not to be taken lightly, though admitting to false, vague, and unspecified “mistakes” would be tantamount to admitting to career-ending misconduct. Baldoni, Wayfarer, and Heath refused to apologize for sins they had never committed. They took a stand, knowing full well that Lively and Reynolds would bring the full might of their celebrity artillery against them. And that is precisely what happened.

17. Lively, working with her husband, her publicist, and Jones, among others, set out on a campaign to tar and feather the Wayfarer Parties in the press. They conspired and worked in concert with the *New York Times* to put out a blockbuster news report as devastating as it was

false. They advanced a fabricated narrative in the press that the Wayfarer Parties had sexually harassed Lively, then embarked on a calculated and malicious smear campaign to destroy her reputation as retaliation for daring to complain about the harassment. The Lively Parties laid their trap carefully over a period of months before springing it all at once on the eve of the winter holidays. Just as plainly, they knew full well that their claims were entirely baseless, because their own wrongfully obtained “evidence” proved that *neither the alleged sexual harassment nor the accompanying smear campaign against Lively ever existed*. Yet Lively moved forward with her plan with ruthless precision, doubling down in the face of abundant evidence casting doubt on the veracity of her story. Lively even went so far as to serve her lawsuit on the Los Angeles-based defendants as they evacuated their homes in the midst of devastating fires engulfing their city. On a day when the Wayfarer Parties were gathering their kids and pets, preparing “go bags” and monitoring evacuation orders while fearing for their homes, Lively—from the safety of her penthouse in New York—deployed process servers in the midst of these troubling times.

18. At bottom, this is not a case about celebrities sniping at each other in the press. This is a case about two of the most powerful stars in the world deploying their enormous power to steal an entire film right out of the hands of its director and production studio. Then, when Lively and Reynolds’ efforts failed to win them the acclaim they believed they so richly deserved, they turned their fury on their chosen scapegoat. Tolerating a year and a half of their behavior while remaining polite and professional at every turn offered Badoni and Wayfarer no protection.

19. By bringing this Complaint, the Wayfarer Parties commit themselves to seeking and proving the facts, based not on insinuations built from selectively edited and context-free text snippets, but by putting *all* the evidence before the Court—and the public. When the Wayfarer

Parties have their day in court, the jury will recognize that even the most powerful celebrity cannot bend the truth to her will.

**A. Baldoni and Wayfarer Purchase the Rights to *It Ends With Us***

20. Baldoni co-founded Wayfarer in 2019. From the beginning, Wayfarer was dedicated to being a different kind of studio—one that produced world-class entertainment driven by a powerful vision for change.

21. Baldoni, whose film career was dedicated to producing and directing meaningful films to have a positive impact on the world, was deeply moved when he read the book *It Ends With Us*, and genuinely believed he could make a film that could save lives. His last two films were created as a result of a deep sense of responsibility to share meaningful stories. Baldoni's feature film directorial debut, *Five Feet Apart*, was based on a young woman, Claire Wineland, who lived with Cystic Fibrosis ("CF") and courageously documented her plight on YouTube. Baldoni, his family, and friends developed a friendship with Claire, whose journey deeply inspired Baldoni. Before Claire passed away, Baldoni promised he would tell her story. And he did just that, in the film he directed. The film had wide impact on the CF community, and Baldoni still receives messages about the film's impact. Baldoni also supports her foundation yearly and remained close with Claire's parents, even bringing her father as his guest to the premiere of *It Ends With Us*. Baldoni's more recent film was the Wayfarer film *Clouds*, a true story about a teenager with cancer, Zach Sobiech, who finds joyful purpose and inspiration in music.

22. In pursuit of that same vision, in 2019 Wayfarer acquired the film rights to *It Ends With Us*, a Colleen Hoover novel published in 2016. Though positioned as a romance novel, the book explores themes of domestic violence and generational patterns of abuse, and these messages resonated deeply with readers and drew a passionate fan base. In 2021, the novel exploded in

popularity thanks to the social media phenomenon “BookTok.” Many fans expressed how important the book was to them as survivors of domestic violence and intimate partner abuse.

23. When *It Ends With Us* author Colleen Hoover watched *Five Feet Apart* in theaters, she told Baldoni, “you are the right person to make this movie” (referring to *It Ends With Us*). Baldoni’s early emails to Hoover demonstrate his commitment to doing so in the manner he envisioned would be most impactful. In fact, it was Hoover who suggested Baldoni portray “Ryle.”



**From:** Justin Baldoni [REDACTED]  
**Subject:** Re: Introduction  
**Date:** February 1, 2019 at 10:43:45 PM PST  
**To:** Colleen Hoover [REDACTED]  
**Cc:** [REDACTED]

Hello Colleen! (Thank you for the intro [REDACTED])

Wow, it's such a pleasure to e meet you and thank you for being open to having me potentially option your book.

Some quick backstory- my purpose and intention in this insane business are simple - create impact by making content that helps us remember our shared humanity. Content that asks us to be better, to make the hard choice in the moment that one day on our death beds we will be grateful for. It's been a tough road but an incredible one as our industry doesn't often reward those of us trying to change culture. Luckily it's the messages of those that watch the content that are the reward and the lives we have effected. I've always believed the financial reward will come but it's not the primary motivation.

As [REDACTED] may have told you, I am building (and got funding) for a company whose mission is to tell high end meaningful stories and I just finished my first film with my 2nd set up at WB going this fall (based on THIS short doc I directed 7 years ago)

Also, if you'd like to see an early screening of Five Feet Apart -I'm sure I could make that happen as well. Where are you based?

Just wanted to say of the reviews I read for this book, this one stood out to me, and makes me so excited to potentially work with you. Your fans love you- what a gift you have.

"Of all the heroines I've ever read, Lily was most certainly one of the ones I admired the most. I knew loved her from the first few pages, but having finished the book, I truly couldn't be prouder of her. Her strength and conviction over the course of this story made her into a heroine I'd want every girl and woman to read about and look up to. She was so real and vulnerable as we all are, but the strength with which she took control of her life was admirable on such a deep level. I just wanted to hug her and cheer. I don't think I've been this proud of a fictional character before.

There's an incredibly *powerful message* in this book that is very subtly woven in from the start. It begins in the first chapter, but you don't yet realize how *significant* each of these moments truly are... and as you read more, these pieces of the story come together forming a scenario that gives such a raw, honest portrayal of an incredibly relevant issue. I'm not mentioning it on purpose because I don't want you to expect it. *The fact that it's unexpected for you as the reader is very important because it's also unexpected for the heroine.* As she begins to realize what kind of situation she's in, so do you. And this realization very much allows you to experience her journey *with* her."

Yes, please send over a e-book but I also just purchased it on paperback as I like supporting authors.

Looking forward!  
Justin

On Thu, Apr 11, 2019 at 5:00 PM Justin Baldoni [REDACTED] wrote:  
Colleen!!

I'm finally coming up for air from the release of the film but still shooting Jane for another two weeks. (by the way were you able to see it? Would love to know your thoughts) We actually started filming the final episode today...crazy! So grateful.

So, I haven't been able to get IT ENDS WITH US off my mind. Such an important story! So damn romantic and beautiful and tragic and hopeful. I always say that both in art and life all the best stories are always two things at once and this is so much what your book is. Joy and pain. Love and sorrow. You did such a beautiful job of covering incredibly difficult subject matter and playing it out in a realistic and unforgettable way. But what I love the most is the opportunity to let so many women feel seen on the screen via this particular story. I can't even imagine how many women there are who are stuck in a relationship like this and via this story could find the strength to create a better life for themselves and for their children. There are so many opportunities to partner with organizations and create impact with a story like this.

I love that you held nothing back from the pain of Lily and Ryle's past. I love that they really are no "bad guys" and that we are the sons of our experiences and our trauma. I love the opportunity for narration and the stunning and gorgeous impact of the title payoff at the end. These are the kind of stories that change (and save) lives and I believe this story in particular can continue to have a huge impact on the world SO. If you will have me ...I would love to option it from you!

On a separate note, the screenplay for *Five Feet Apart* was adapted into a novel and has been on the *New York Times* bestseller list since before the release of the movie last month. I know you have your charity and I would be happy to donate some signed copies for The Bookworm Box.

Let know what you think!  
Much love,  
Justin

Justin Baldoni  
[We Are Wayfarer](#)

**From:** Colleen Hoover [REDACTED]  
**Subject:** Re: It Ends With Us.  
**Date:** April 11, 2019 at 6:43:27 PM PDT  
**To:** Justin Baldoni [REDACTED]

Thank you so much for the email! I wasn't expecting you to read it so quickly. I would love to talk with you more about the project. You "get" the book, and that's the most important thing to me. My big fear is that I'll option it to someone who thinks it's a hot romance and they'll take it in the absolute wrong direction.

I'm going to be upfront with you about a couple of things so you can decide if you want to move forward.

I've sold several film options, and I realize not all of them get made and I'm okay with that. One of the film options was not a great experience. The producers started a fundraising campaign for the film (without my knowledge or permission beforehand) and ended up taking over \$100,000 from my readers. The film was never made, my option was never paid and I ended up pulling the plug on the project and the producers never refunded readers their money. I felt terrible that my readers were the ones punished, so I mailed out \$15,000 worth of free products to those who donated to their campaign. I want to be positive that crowdsourcing is not something that will be done when it comes to this film. It's important to me that a funding plan is in place that won't affect the supporters of this book.

While that experience wasn't a positive one, I had a wonderful experience working with a producer on Confess. It was a seven episode series that was picked up by Awestruck and Go90, but unfortunately, right before it released, go90 declared they were shutting down. Because of that, Confess released on an already defunct platform, just a week before they were scheduled to shut down. Luckily, my readers got to watch it, so not all was lost. And the overall experience was so much fun and very surreal. I didn't really have a lot of involvement beyond reading the script and getting the dailies. I just handed it over and let them do their thing because I was immersed in other projects at the time.

It Ends With Us is important to me, though. I would love more involvement on this film. I've actually been working on a script for it already, along with a producer friend of mine who lives in L.A. Her name is [REDACTED] and she is a very dear friend of mine, and is a huge fan and supporter of this book. We sat down for a week and outlined it last month, but I had to put a pause on it because I'm on deadline for this book I'm writing. We planned on picking it back up in two weeks and diving into it. Even though I'm the author, I believe I've been able to separate myself enough from the format of the book to know what would make the best set-up for the film. While I do want to please the readers who have read the book, I understand the need to make a film that will equally touch those who *haven't* read the book.

Are you based out of Los Angeles? Maybe we can meet and have a chat about our vision for the film to make sure we're on the same page. I'm based out of Texas, but am in L.A. a lot.

Other than ensuring my readers won't be asked to donate to the fundraising for a film, and hoping to have more involvement in the process when it comes to the script and production, I don't really have any other requests. I realize your experience with film far outweighs mine, and based on the magnificent adaptation you did of Five Feet Apart, I'm confident you could do this book justice and that our visions will align.

I watched the film two nights ago and immediately started the book yesterday. Sometimes I like to do it backwards. ;) I think you did a wonderful job, and even though I'm not finished with the book yet, I feel like the essence of it was captured beautifully through film. I wrote a book where one of the characters suffers

from CF, so I've done a lot of research on the subject and thought Rachel (and you) did such an amazing portrayal of what carriers of CF go through.

In fact, our very first donation through The Bookworm Box was to The Cystic Fibrosis Foundation. We donated in honor of the child of one of my readers. His name is [REDACTED] and he's just an incredibly inspiring kid. Check out his video: <https://www.facebook.com/TheBookwormBox/videos/1565173860399495/>

It's actually funny you emailed me when you did. When the email came through on my phone, I was on your website, browsing wayfarer. (Loved the #metoo chat!)

Okay, that's enough rambling. I really do appreciate the email and appreciate you taking a chance on reading the book. My readers are so ready to support this book, and it has meant so much to so many of them, so naturally, I want them to be happy. I want to bring them an adaptation they'll be proud of.

Did you happen to read the author's note at the end of the novel? It's a quick read if you didn't get the chance to read it. My mother inspired this book, so maybe that's why I've been so hesitant to sell the rights to it in the past.

I feel good about this, though. I feel good about you. I've seen your past work, your passion and your love for humanity and I honestly feel there's no one better for the project.

Before I direct you to my agent, I just want to get your thoughts on the above! Thanks so much, Justin. I hope you and the family were able to get some vacation time in!

-Colleen

However this works out, I would LOVE books for the bookstore! In fact, we just started a YA box and would love to feature Five Feet Apart in the subscription box if there's a way we can buy a few hundred copies at cost. Everyone needs this book in their possession.

**From:** Colleen Hoover [REDACTED]  
**Subject:** Re: It Ends With Us.  
**Date:** April 12, 2019 at 9:52:25 AM PDT  
**To:** Justin Baldoni [REDACTED]

Have you given any thought to whether you would want an acting role in this? Say, maybe, Ryle? I could see it.

24. Soon after, Wayfarer partnered with Sony to co-finance and distribute the Film. Their agreement included, at Wayfarer and Baldoni's insistence that the provision was a deal-breaker, a requirement that 1% of the Film's proceeds be donated in support of survivors of domestic abuse. That 1% was ultimately earmarked for the organization "No More," with which Baldoni had sought to partner with as early as September 2022.<sup>5</sup>

25. As they began making the Film, Baldoni and Wayfarer felt an immense responsibility to do justice not only to the story of protagonist Lily Bloom, but to the stories of survivors around the world. Heath, CEO of Wayfarer, expressed to Forbes on June 28, 2024 his high hopes for the film<sup>6</sup>: *"I hope that people leave the theater feeling inspired - that for those who have been hurt, that they feel seen and the story was told in a way that honored them. I feel like people who may in themselves, as someone that may hurt somebody, may think twice about it. So, I hope that people leave feeling that they got a glimpse into a world that, often times, we turn our eyes away from."*

26. In casting Blake Lively, a world-renowned actor with talent and charisma, in the leading role, they entrusted her with that vision, to bring Lily to life. Although Wayfarer learned that Lively had a reputation for being difficult to work with, Baldoni at the time was not dissuaded and found her to be genuine.

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<sup>5</sup> Stunningly, later in the process, Lively refused the opportunity to meet with No More, despite playing the lead role in a movie centered on themes of survival and resilience in the face of domestic abuse.

<sup>6</sup> Jeff Conway, "Meet the Wayfarer Studios Team Bringing 'It Ends With Us' to Theaters," *Forbes* (Aug. 8, 2024), <https://www.forbes.com/sites/jeffconway/2024/08/08/meet-the-wayfarer-studios-team-bringing-it-ends-with-us-to-theaters/>.

**B. During Pre-Production, Baldoni and Lively Begin a Promising and Close Collaboration**

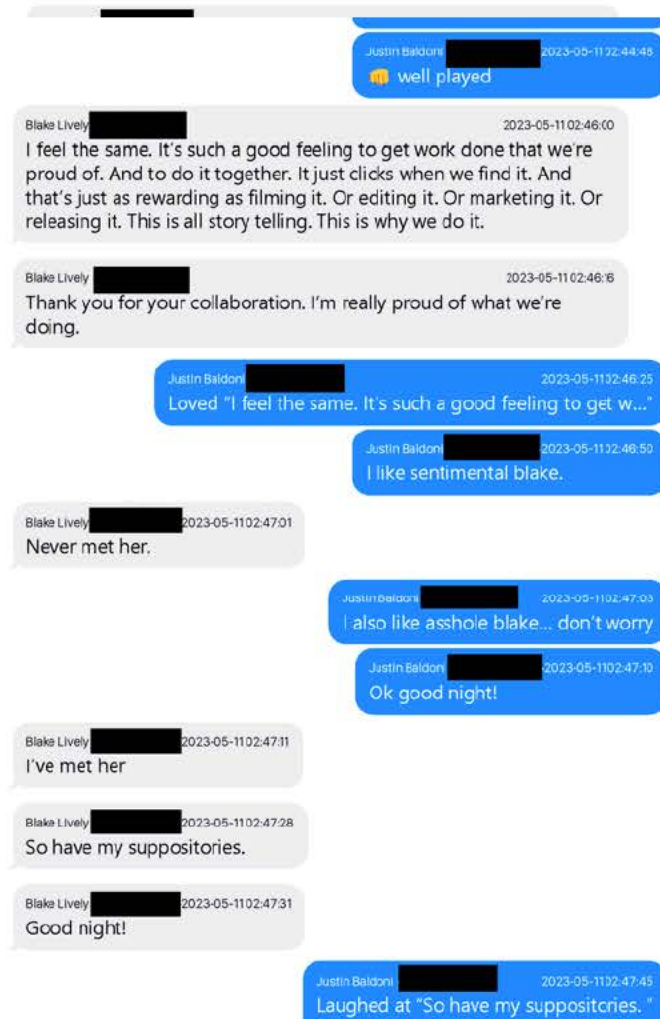
27. On or about December 31, 2022, Lively agreed to take the lead role of Lily Bloom. As part of the subsequent negotiations, Lively was granted an executive producer credit, a title often given to talent of her stature. (Lively had requested a producer credit, but Wayfarer and Sony demurred, given that such a title would not accurately reflect the role she was asked to play in the production). Wayfarer did not request nor require that Lively contribute to the Film in any capacity beyond her roles as actor and executive producer.

28. In the beginning, it appeared that Baldoni and Lively would have a positive, collaborative creative partnership. Baldoni and Lively worked closely in the early days of the Film, trading ideas about filling key roles in the Film's cast and crew.

29. Their working relationship grew close. Baldoni and Lively shared stories and pictures from their lives, commiserated over family illnesses and exchanged jokes and memes. Baldoni offered concern and support when Lively faced family health concerns. They texted almost daily, and a friendly banter established a comfortable dynamic that, under typical circumstances, would have made working together easy.



30. Lively even felt comfortable enough to make silly jokes redirecting a sweet compliment Baldoni gave:



This was the nature of their relationship, which made Lively's later allegations all the more baffling.

### C. Lively Begins Asserting Control Almost Immediately

31. Almost immediately, Lively began inserting herself into the production process in intrusive ways well beyond the scope of her contractual entitlements. For example, Lively began to insist on creative control over her character's wardrobe. While lead actors are sometimes granted approval over their characters' general look, they generally do not receive full control over

wardrobe decisions without input from the director or producers. What may seem like an innocuous request can in fact have monumental impact on a film production.

32. Ignoring the director's vision for her character and disposing of the weeks of effort and creativity spent by the wardrobe team on shopping and carefully crafting her wardrobe, Lively sent hundreds of images to the Film's costume designer, including into the late hours of the evening, depicting the style of wardrobe she wanted for her character. The costume designer had to re-shop Lively's wardrobe, far exceeding the allocated budget and diverting time and resources, while also preparing wardrobes for the rest of the cast. At one point, Lively insisted that her character "had money" and could afford \$5,000 shoes—despite being a fledgling small business owner. This forced Baldoni to rethink the entire script that had been in the works for well over a year and was approved by both Sony and Wayfarer – a script that Wayfarer had commissioned multiple drafts of and incorporated countless notes (including input from the book's author, Colleen Hoover). The wardrobe budget ballooned.

33. Lively often refused to participate in wardrobe fittings at the production office, which was a mere fifteen minutes from Lively's home. Instead, she insisted that the costume department pack up wardrobe and deliver it to her personal residence. Loading the wardrobe department on trucks and delivering the contents to Lively's home in the middle of congested Manhattan for fittings cost time and money—always in short supply on any major film. Requests of this nature are typically made during contract negotiations; since Lively made no such request at the time, this added expense was not included in the budget. Lively, who had a greater obligation to the studios as an executive producer, paid no heed to budget constraints, let alone to the months of planning that had already been completed.



34. In an effort to maintain harmony at the start of their working relationship and to avoid further delays caused by wardrobe conflicts, Baldoni and the studio reluctantly ceded full control to Lively over her wardrobe. This concession quickly proved regrettable.

35. On the first day of principal photography, paparazzi captured and published photos of Lively in character wearing her hand-picked wardrobe. These images were widely reported as unflattering<sup>7</sup> and sparked a backlash from Sony. Baldoni received direct criticism from Sony, who voiced serious concerns about the impact of the photos on the Film's public reception.

36. Following these events, Baldoni approached Lively in her hair and makeup trailer, where she was surrounded by her team, to ask if they could speak after she was done getting her hair and makeup done. Baldoni wanted to discuss necessary wardrobe adjustments, reassert his role as director, and get her on board with him having approval over her character's wardrobe. They later had that conversation in her trailer; while professional, it took considerable time and was later grossly misrepresented in Lively's CRD complaint, which falsely characterized the exchange as a "lengthy outburst" that delayed filming and caused the crew to "wait for hours while [Baldoni] cried in Lively's dressing room." On information and belief, Lively circulated this false account to the *New York Times* with the intention and result that it be widely published.

37. This conversation did not take hours, and any length of time it took was not because Baldoni "cried for hours." In truth, rather than take heed of the concerns of the film's distributor and director, Lively took this time to, among other things, suggest to Baldoni that he was being "gaslit" by Sony, Heath, and the other producer, and try to convince him to let her continue to take

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<sup>7</sup> Notably, Lively herself had voiced insecurities about the public perception of her casting as Lily Bloom. Lily is described as a twenty-three-year-old young woman and recent college graduate *within the first few pages* of the book, which Lively would have known had she read the book before production (despite having admitted to ordering a copy months before, which, remarkably, she ordered only *after* she had already committed to the role on December 20, 2022). Nevertheless, when Lively learned that Lily was a decade-plus younger than herself in the book, Lively asked that author Colleen Hoover explain in her public casting announcement that they had decided to "age up" the book's characters for the Film. Hoover didn't put the statement out in the way Lively requested. Lively was not happy.

the helm. Baldoni did briefly become emotional during the conversation, but only in response to what he believed was a genuine compliment from Lively, praising his work as a director and actor. In hindsight, this was part and parcel of the ongoing pattern of manipulation and gaslighting *by Lively*, intended to continue to allow her autonomy over her wardrobe.

38. Lively later distorted this conversation in support of her baseless harassment allegations, alleging that Baldoni made inappropriate “comments on her appearance.” In reality, Baldoni, the film’s *director*, was relaying the distributor’s concerns and the widespread social media criticism regarding the wardrobe’s failure to meet audience expectations—a sentiment Baldoni shared. This incident is just one of the many examples of Lively’s troubling pattern of manipulation and lies.

39. As another example, early in the pre-production stage, Lively sent Baldoni a long text describing how directors never permitted her to write scenes for the movies she acted in nor gave her writing credits, even making her hand-scribble her suggestions for lines so that they could not be traced to her. Lively boasted that she had even written for her husband’s movies. Then Lively asked if she could “take a pass” at writing the rooftop scene in *It Ends With Us* in which the characters Ryle and Lily first meet. This pivotal scene, much beloved by book fans, was critical for setting the tone for the movie, so Baldoni was reluctant to allow an actor (rather than a union screenwriter) to rewrite this key scene. But Baldoni felt the need to allow Lively to rewrite the scene and agreed to take a look at what she put together.

40. The draft of the rooftop scene that Lively sent Baldoni dramatically differed from what had been written originally. Baldoni was hesitant about many of the changes, but thanked Lively for her passion and diplomatically told her that the scene would likely end up being somewhere between the original version and Lively’s version.

41. Seemingly stung by Baldoni's exceedingly mild resistance, Lively did not respond and went silent for multiple days. Later, she confirmed (in a text message below) that Baldoni's response "of course, didn't feel great for me. Or [another megacelebrity friend and Ryan Reynolds]. To have my passion praised instead of my specific contribution." Lively was referring to an earlier meeting where Lively summoned Baldoni to her New York penthouse where Baldoni was greeted by Ryan Reynolds, who launched into enthusiastic praise for Lively's version of the scene. Hours later, as the meeting was ending, a famous, and famously close, friend of Reynolds and Lively, walked into the room and similarly began praising Lively's script. Baldoni understood the subtext: he needed to comply with Lively's direction for the script.

42. Later, Baldoni felt obliged to text Lively to say that he had liked her pages and hadn't needed Reynolds and her megacelebrity friend to pressure him. Lively responded that the two were her "dragons." Lively went on to say:

They [Reynolds and the megacelebrity friend] also know I'm not always good at making sure I'm seen and utilized for fear of threatening egos, or fear of affecting the ease of the process. They don't give a shit about that. ***And because of that, everyone listens to them with immense respect and enthusiasm.*** So I guess I have to stop worrying about people liking me ("I don't know" emoji) [emphasis added].

The message could not have been clearer. Baldoni was not just dealing with Lively. He was also facing Lively's "dragons," two of the most influential and wealthy celebrities in the world, who were not afraid to make things very difficult for him.<sup>8</sup>

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<sup>8</sup> Some of the below text messages were extracted in European time zones and, as a result, do not reflect their true time of transmittal or receipt.

Blake Lively [REDACTED] 2023-04-14 21:54:22  
If you send me the fdx I'll work when I can steal moments. And yes of course please send to Christy. We're all on the same team w the same goal. 🙏

Justin Baldoni [REDACTED] 2023-04-14 22:51:09  
Great! Also was working on rooftop scene today, I really love what you did. It really does hep a lot. Makes it so much more fun and interesting. (And I would have felt that way without Ryan and Taylor) 😊 You really are a talent across the board. Really excited nd grateful to do this together.

Blake Lively [REDACTED] 2023-04-15 01:49:26  
That's very appreciated. And means a lot. I'm deeply inspired by the film we're gonna make outside of the success of this book. We have such an opportunity to not only surprise people who love the book, but reach an even bigger audience by making an undeniably dynamic and also commercial film.

The moment that excited me most the other day was when you said you're not funny. You. Are. Going. To. Kill. That. Rooftop. Scene. You know it, I'm sure. Even though it was said in playful self deprecation that we all participate in, it made me think of the process as a whole.

Please know, I trust that on the day you've got me. And I hope that you trust that I've got you, if you want it.

We're in this together. And we are two of this most determined people I know. We also have very high bars set for ourselves. To collaborate with that type of partner is a gift that neither of us will squander. Because we both care too much about the result and also the experience.

I have no motives except for you to win. As a director. As an actor. As a studio. As a writer. If you win, I win. If you win our movie wins. We are aligned. And I will bring everything I have to this.

Blake Lively

2023-04-15 02:44:03

As for [REDACTED] and Ryan (and [REDACTED] for that matter). I'm the luckiest motherfucker on the planet to have them as my "Dance Moms" level

stage moms. They are embarrassingly effusive.

That said, they're also my most trusted partners and the people I go to first with anything creative I touch. And I'm the person they each go to first. That reciprocal creativity and support has been one of my life's greatest and most fulfilling gifts.

When they loved and signed off on the pages, I felt good to send them to you.

They asked what you thought specifically after. They checked in so many times. I told them that you laughed a bunch and said it's probably a blend but you appreciate my passion so much.

Which of course didn't feel great for me. Or them. To have my passion be praised instead of any specific contribution. Or even just that you didn't like the pages. Which was fine also.

So I think they wanted you and me to see how they felt about the work because they've been by my side for far too many experiences where I've been overlooked. I spoke to you about this when we first met. They've watched me hand write scripts bc the director is too afraid to send the FDX file yet he scans and has someone hand type all 120 pages of my pencil rewrites. They've watched me be hired as a writer and paid a significant fee for it but on the condition that I never ask for credit, which I could give a shit about, it's more the principle of the dynamics at play. They've watched the other side of it too where I'm told at signing on that I'm wanted as a true collaborator, but once we get to work, I'm really just wanted as a "yes man" audience and actor.

Both Ryan and [REDACTED] have established themselves as absolute titans as writers and storytellers outside of their primary gig- just singing or just acting or [REDACTED] just directing. I'm so lucky to have them as creative barometers. But also to have them as the people who prop me up and make sure I'm seen for all I can, and do, offer. Because they know firsthand all I contribute. They also know I'm not always as good at making sure I'm seen and utilized for fear of threatening egos, or fear of affecting the ease of the process. They don't give a shit about that. And because of that, everyone listens to them with immense respect and enthusiasm. So I guess I have to stop worrying about people liking me 🥰

If you ever get around to watching Game of Thrones, you'll appreciate that I'm Khaleesi, and like her, I happen to have a few dragons. For better or worse, but usually for better. Because my dragons also protect those I fight for. So really we all benefit from those gorgeous monsters of mine. 🐉 you will too, I can promise you.

43. “Difficult” proved to be a gross understatement. Though Baldoni initially invited Lively to make changes to the script, Lively began altering the script daily. The frequency of Lively’s revisions alarmed the producers, director, and studio, who anticipated that her interference would persist “every day of the shoot” and disrupt the carefully planned production schedule. Each shooting day was intricately scheduled long in advance, and Lively’s constant changes placed significant stress on the production crew, not to mention financial strain on Wayfarer.



Producer

May 1, 2023 at 5:26 AM

Are you listening to this

She's fixing the script

I think [REDACTED] advice was actually wrong

Blake is now directing the movie

This is bad

Jamey Heath

Im listening. Talking through it is better than not.  
Seeing what's possible. As long as any decision is  
done with approval.

Producer

Not for something that was already intimately  
planned

This will be every day of the shoot

Jamey Heath

I know. I'm not sure what can be done honestly.  
At this point in terms of

---

At this point in terms of  
Blake

44. More than a year later, during a red-carpet interview at the New York film premiere, Lively stated, “The iconic rooftop scene, my husband actually wrote it. Nobody knows that but you now.” This startling revelation directly contradicted Lively’s previous insistence that *she* had written the scene—and certainly casts Reynolds’ high praise for the rewritten scene in a different light. The film’s credited screenwriter, when asked about the claim that Reynolds had written the scene, graciously responded, “So if I’m being told that Ryan wrote that, then great, how wonderful.” She went on to acknowledge, “There were a few little flourishes that I did not write

. . . and if those flourishes came from Ryan, I think that’s wonderful.”<sup>9</sup> This was also the first time that the Wayfarer Parties learned that Reynolds—who had no formal role whatsoever in the Film’s production—had made unauthorized changes to the script in secret. Baldoni, equally blindsided by this news, which he discovered in real time during a recorded interview with Access Hollywood, reacted by also praising Reynolds, so as not to harm Lively, Reynolds (who apparently wrote the scene, and possibly others, during the WGA strike), or the Film.

45. Lively’s remarks about Reynolds’ purported contribution to the script raised eyebrows sky-high at Sony, who told Wayfarer that they “certainly need[ed] some clarity on public comments made about Ryan Reynolds potentially contributing writing services for the rooftop scene.”

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<sup>9</sup> See Benjamin VanHoose and Julia Moore, *Blake Lively Says ‘Nobody Knows’ Ryan Reynolds Wrote a Scene in It Ends With Us as Screenwriter Weighs In* (Aug. 8, 2024), <https://people.com/blake-lively-ryan-reynolds-wrote-scene-it-ends-with-us-8692864>.



From: [REDACTED] Sony Legal Affairs  
Date: Fri, Aug 9, 2024 at 11:38 AM  
Subject: IT ENDS WITH US / Ryan Reynolds Writing Issue Wayfarer Counsel  
To: [REDACTED]  
CC: [REDACTED]

Hi [REDACTED],

We certainly need some clarity on public comments made about Ryan Reynolds potentially contributing writing services for the rooftop scene.

Can you provide additional information on this, as there are no contracts, his services are not in the chain, nor is his name anywhere in the credits.

One of the many media reports which cite this claim made by Blake Lively: <https://people.com/blake-lively-ryan-reynolds-wrote-scene-it-ends-with-us-8892884>

Thanks for clarifying. If services were rendered, obviously we require signed documentation immediately.

From: [REDACTED] Wayfarer Team  
Date: Fri, Aug 9, 2024 at 12:28 PM  
Subject: IT ENDS WITH US / Ryan Reynolds  
To: [REDACTED] Sony Legal Affairs  
Cc: [REDACTED]

Hello [REDACTED],

Your email was shared with me by [REDACTED] in order to address this issue.

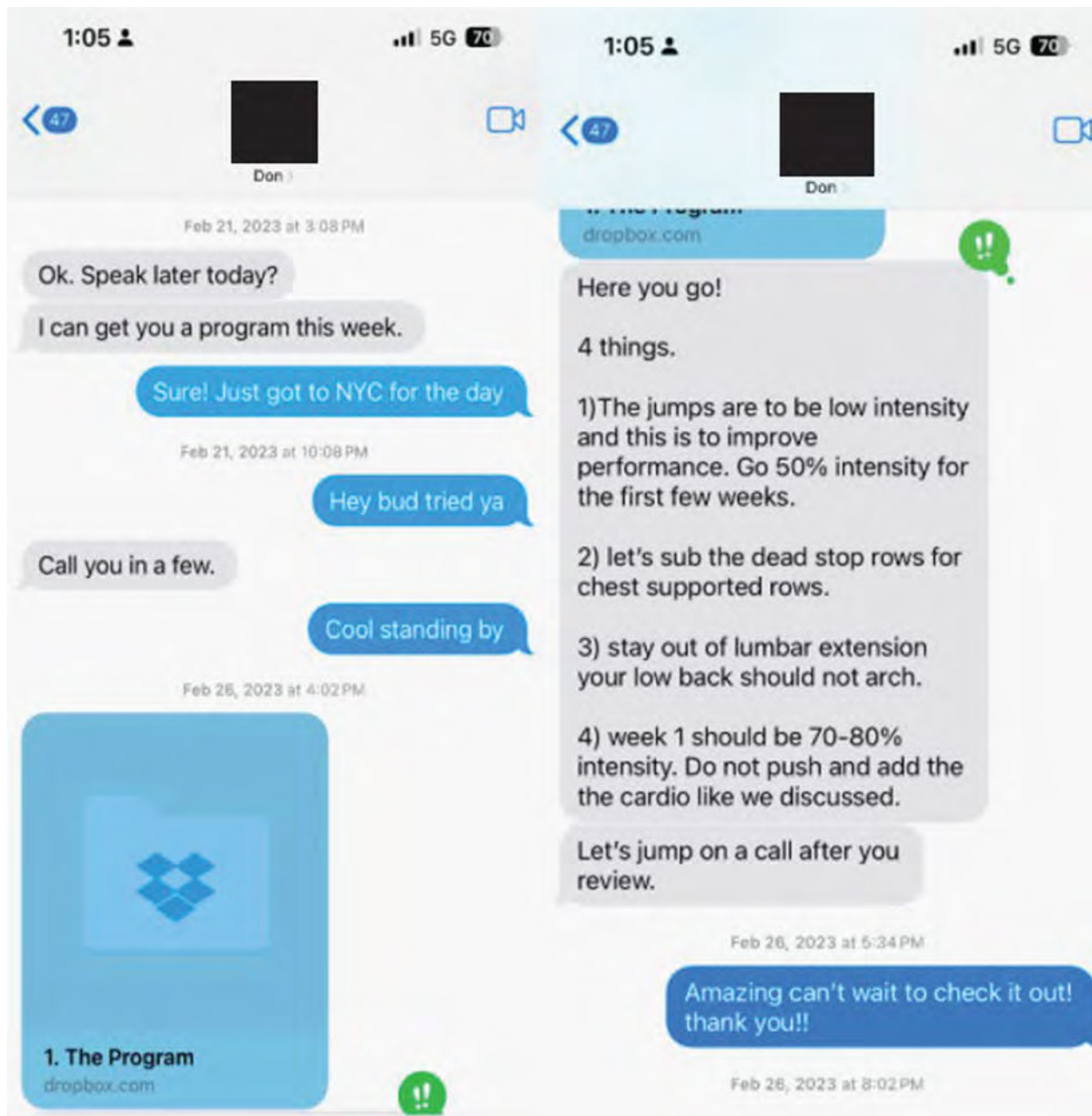
We are not aware of any writing services rendered by Ryan Reynolds. Regardless of what is being said publicly, this is not something we are aware of. We are learning about these allegations in real time.

Please let me know if you have any questions.

Thank you,  
[REDACTED]

46. Still during the pre-production phase, Lively and Reynolds raised entirely false allegations of fat-shaming against Baldoni: an accusation that, as evidence will show, was categorically false.

47. Baldoni had been introduced to trainer “Don”—who became Baldoni’s personal trainer—by Lively. Don directed Baldoni’s preparation for the Film role, including his nutrition and exercise, making special accommodations for Baldoni’s back injury; Baldoni even paid to receive Don’s meal delivery service.



48. On April 22, 2023, Baldoni privately reached out to Don, his personal trainer, to ask what Lively weighed so that he could train his back muscles in preparation for a lift scene. This was important to avoid injury not only to Baldoni, who suffered from lifelong back injuries, multiple bulging disks, and chronic pain, but also to Lively if the lift could not be completed successfully and safely. Notwithstanding Lively's recent attempts to deny the existence of any such scene, it was only nixed at her insistence after having been planned and rehearsed.

49. On April 25, 2023, Lively summoned Baldoni to her penthouse, purportedly to discuss the script. However, he was met by an angry Reynolds, who screamed at Baldoni and accused him of fat-shaming his wife (“*How dare you fucking ask about my wife’s weight? What’s wrong with you?*”). The confrontation by Reynolds and Lively was so aggressive that Baldoni felt he had no choice but to offer repeated (and completely unwarranted) apologies for what was a good faith and reasonable question to ask of his trainer. Reynolds demanded Baldoni remove the scene entirely. Lively refused to perform the lift scene in the end, even after it was rehearsed with a stunt double. In her own Complaint, Lively flat out lies about the absence of this scene by claiming “the scene wasn’t in the film.” *The only reason the scene wasn’t in the film is because Lively and Reynolds ensured it was taken out of the Film.* Accommodating Lively, Baldoni re-wrote the scene with Lively, despite the fact that for creative reasons, this scene was important to him as a storyteller and director.

50. In fact, Lively had earlier expressed insecurity about her postpartum figure, and Baldoni made every attempt to genuinely reassure her. In this exchange, he stated, as her director, that, “anything you feel insecure about we will talk through and get creative together and make you comfortable. I just don’t want you to stress about your body, it’s the last thing you need.” When he later tried to do just that, Lively responded with allegations of sexual harassment followed by a lawsuit.

Blake Lively [REDACTED]

2023-02-17 17:34:47

Kicking ass. But it's still a ton of work with not a ton of time. What's the chance we can do body scenes at the end of the schedule?

Justin Baldoni [REDACTED]

2023-02-17 17:37:04

I'm sure you are!

Honestly, there's 1 billion moving parts to schedule right now I just turned in the rewrite and so they are hard at work -'so much of it

comes down to locations and the other cast availability etc. so to be really honest I have no clue.

Justin Baldoni [REDACTED]

2023-02-17 21:28:30

I Want you to know- you will look amazing. Anything you are insecure about we will talk through and get creative together and make you comfortable. I just don't want you to stress about your body. It's the last thing you need. As soon as I have a rough schedule that's even remotely accurate I'll share and I'll make sure the team keeps this in mind as well ❤️

Blake Lively [REDACTED]

2023-02-18 03:37:57

Thank you for your voice memo. It is deeply appreciated. You are everything you promised to be as a collaborator. Thank you.

I know my job here. And this piece is in big part my job here. We both understand the assignment. As actors in the roles. But also as producers. And also as marketers. We understand artistically, yes, but we get what we need to do in all aspects for this movie commercially. As woke as we both are and work to be, this movie requires a certain aesthetic. It's a part of the job that we both excitedly signed up for. I don't shy away from it because it's not problematic. It's the assignment. Like when someone is about to start an athletic event. It's their job to be in top shape. My husband and I both look at certain roles as athletic events. And this is one of them. It's not always a part of the job. But on this one it is. And that's great.

As much as I'd love to not think about it, that would be irresponsible and also impossible because it's unrealistic to not acknowledge what I need to do.

This is my job here. And I meet my responsibilities with extreme work ethic. I look for solutions to achieve my high goals, instead of lowering my goals. We all win when we're each firing at our highest capabilities. And you and I both are. And will continue to. I just need as much time as possible because I just had my 4th baby. I understand that you'll never personally know all the nuances of the challenges unless you lived this physical moment in time I'm in with this physical road ahead, so having your understanding and support

to help me pull this off is critical. And very, very appreciated. Not just in my experience now, but also healing from experiences passed. So thank you.

We are gonna kill it. And be so fit they have to Lola us to look less bangin'



51. Lively then delivered an ultimatum: if Baldoni could not get on board with her work methods, *he still had two weeks to recast her*.

52. Implicit in this ultimatum was a threat to destroy Baldoni's reputation and career. As Lively well knew, Baldoni has worked hard throughout his career to earn and deserve a reputation based on his passionate advocacy for women's rights—a reputation she would later exploit and weaponize against him. If Lively were to back out of the Film, especially based on accusations of fat-shaming, Baldoni's reputation and life's work would be left in tatters. He had no choice but to bow to Lively and Reynolds' demands. Concerns about Lively's undue influence over the Film began to grow even before filming started.

**Producer** Apr 20, 2023 at 6:16 AM  
He cannot let her have opinions on everything

**Jamey Heath**  
Blake?

---

**Producer**  
Or shes going to be codirecting this film

yes

**Jamey Heath**  
Yeah we were talking about that a lot yesterday.

**Producer**  
EXACTLY

This is why everyone is starting to lose it

We been talking about the same thing for months

**Jamey Heath**  
Yep.  
It's starting to get resolved

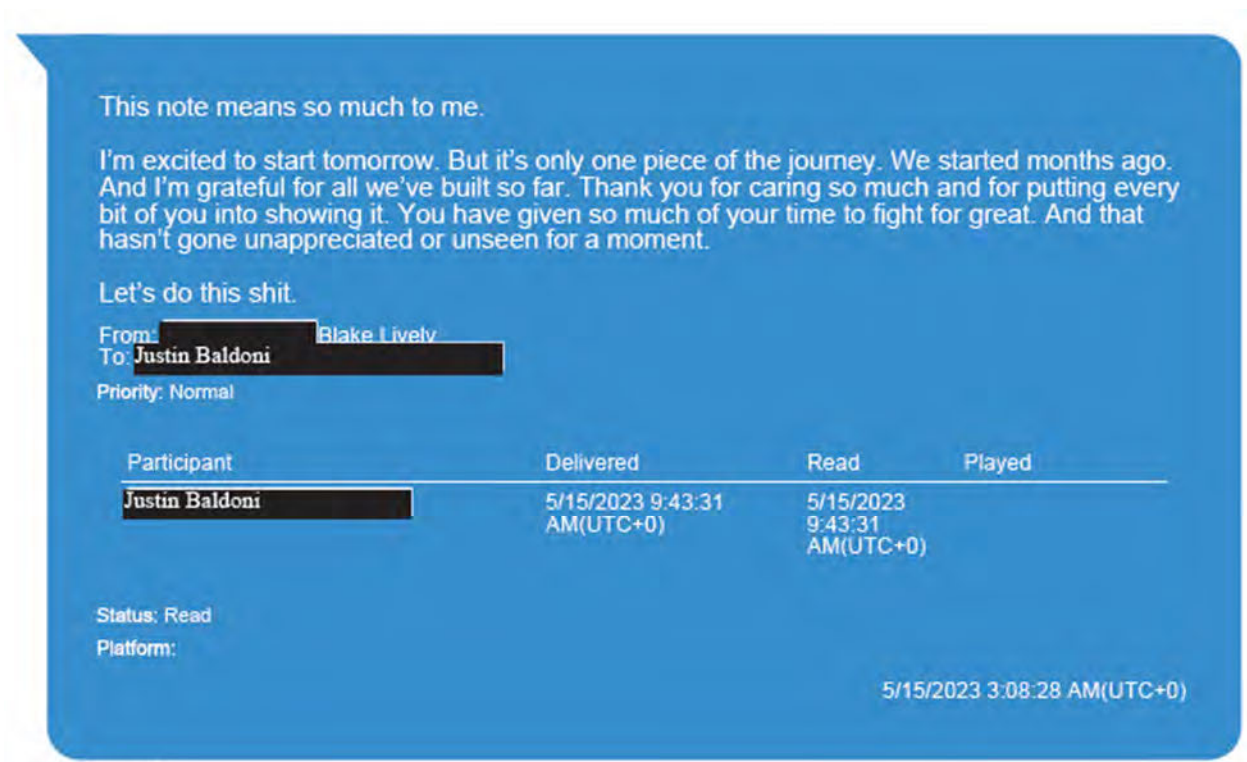
**Producer**  
No its not

53. This was the first time Lively openly moved to seize control of the Film from Baldoni—but it would not be the last.

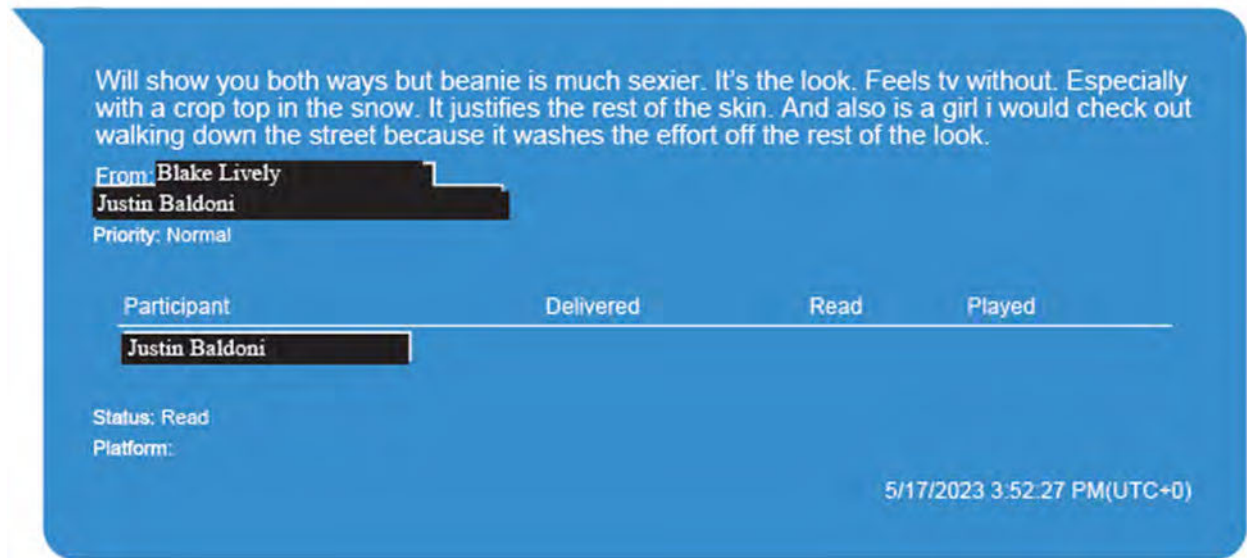
**D. Filming Begins as Lively Builds Her Takeover Strategy**

54. Principal photography began for the Film in early May 2023. On set, Lively continued to maintain what later appeared to be a façade of a close, caring relationship with Baldoni, even as she continued to make escalating demands for creative control.

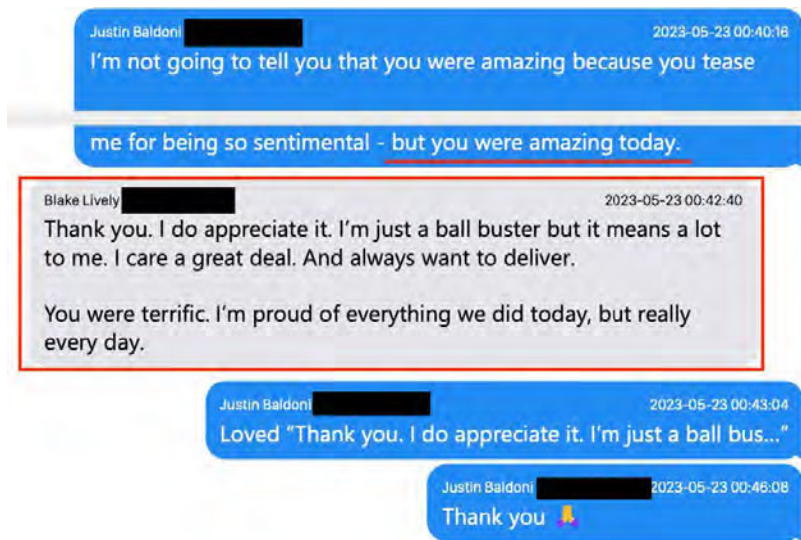
55. By the time production began, Lively and Baldoni had worked closely together for months, and Lively expressed warm gratitude for her collaboration with Baldoni on the eve of filming:



56. Throughout the first filming period, Lively continued to share her open and unguarded thoughts on life and her character. She talked about wardrobe choices to make her character “much sexier.”



57. Lively continued to express her warm appreciation and respect for Baldoni as filming continued, even as she acknowledged she could be difficult and critical of others, using the kind of language she herself would have alleged to be inappropriate:<sup>10</sup>



<sup>10</sup> Lively's use of the word "ballbuster" would certainly have made it on her 17-point list had it been Baldoni who said it.



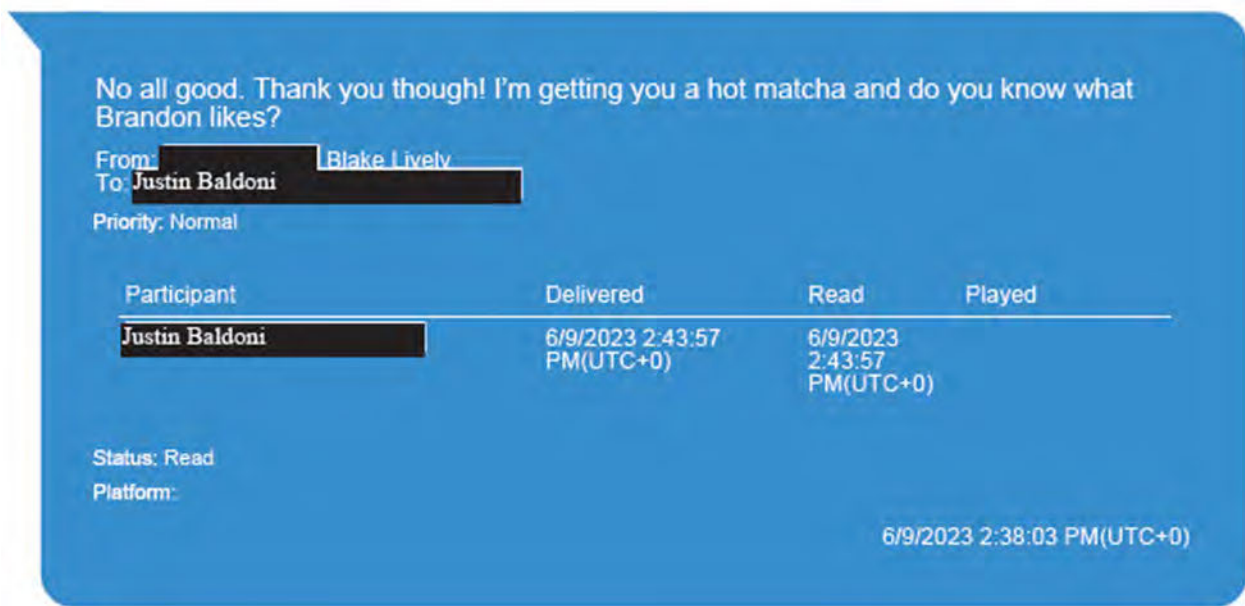
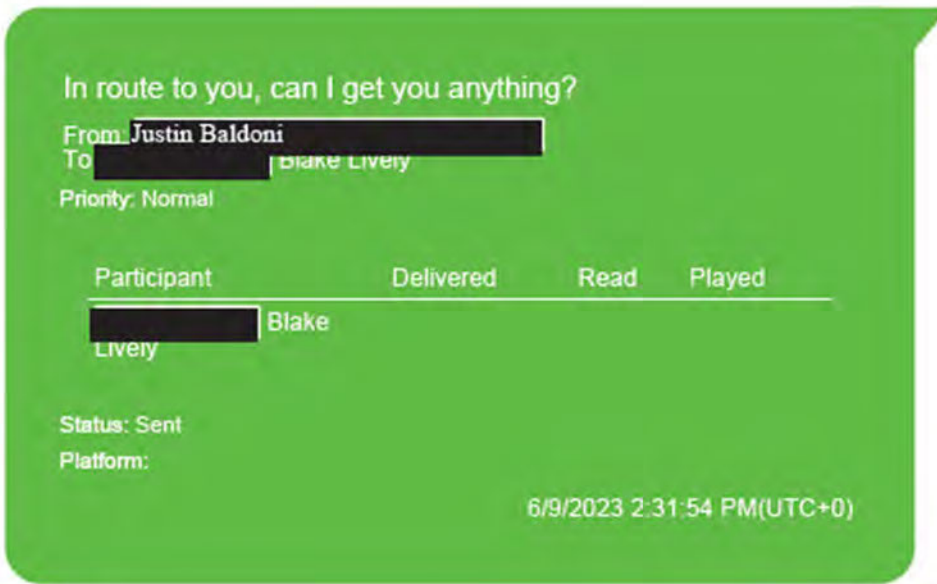
58. Lively's intimate comfort with Baldoni continued as filming progressed. In June of 2023, *after* the alleged harassment and "uncomfortable" situations allegedly occurred, she even invited Baldoni to her trailer to rehearse while pumping breast milk:



59. Lively was so close and comfortable with Baldoni that she freely breastfed in front of him during meetings, including when her husband was present. Oftentimes, Lively's baby nurse would come in mid-meeting with Lively's hungry baby, and Lively would breastfeed openly and without hesitation. On every occasion, Baldoni averted his eyes from Lively's chest, either maintaining eye contact or looking away. Lively also took photos of him holding and soothing her crying baby<sup>11</sup> in her penthouse. They laughed deliriously during late-night writing sessions. All of these events took place *after* the alleged sexual harassment. Lively's accusations seemed to come out of the blue.

60. She even knew his tea order:

<sup>11</sup> Out of respect for Lively's privacy, this Complaint does not include any images of her family.



61. Lively herself set the tone for personal discussions on set, including what language was acceptable. For example, on one occasion while filming a restaurant scene, Lively sat on the floor in painfully expensive shoes while discussing with a group of male cast and crew how “sexy” her shoes were.<sup>12</sup> Lively had no issue using the word “sexy” herself, but apparently took note both times Baldoni said the word in her presence.

<sup>12</sup> This is evidenced in film footage captured between scene takes.

62. Though she was loose and relaxed in her speech on set, she was increasingly stringent in the demands she imposed on the production. She rewrote her own dialogue constantly, and took it upon herself to make unilateral changes to other characters' lines, effectively rewriting the script day by day. This pattern of domineering interference caused unending interruptions to the production process, leading to entirely unnecessary stress, chaos, and delays. It is well documented on film footage how frequently she requested changes, and how, at every turn, Baldoni took her thoughts and, out of fear of repercussions from Lively and her allies, he consistently tried to accommodate them.

**E. During Labor Strikes, Lively Moves to Seize Absolute Power**

63. On May 2, 2023, the Writers Guild of America ("WGA") went on strike.

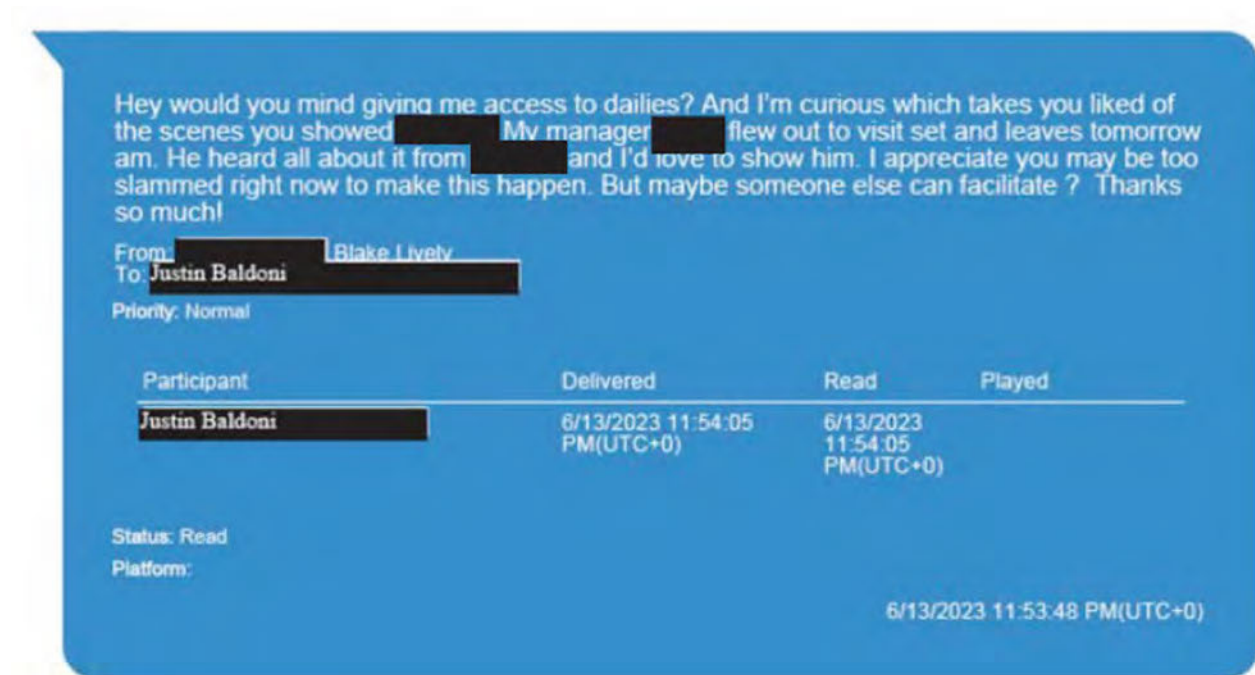
64. Production on the Film halted temporarily on June 14, 2023 due to WGA picketing; the next day, the production was notified that the WGA had agreed not to picket their set, allowing production to continue. But Lively was already gone and refused to return to the production immediately. Wayfarer reworked the shooting schedule at great expense to film the scenes with the younger versions of the characters instead of footage requiring Lively. On June 27, 2023, production shut down entirely for the pendency of the strike.

65. The SAG-AFTRA strike soon followed, beginning on July 14, 2023.

66. To make the most of time during the strike, Baldoni began editing the footage that had been captured to date, starting the director's process of turning footage into film.

67. Lively expressed excitement over returning to shoot in the fall in New York, making no mention of any discomfort or harassment that would be brought up only later, after months of being apart, on the day the strikes ended.

68. Both before and during the Strikes, Lively's eager involvement in the production took on a more insistent and manipulative tone, as she asked for access to the "dailies"<sup>13</sup> and early cuts of scenes – both inappropriate and unorthodox requests.



<sup>13</sup> "Dailies" refers to raw footage of what was filmed that day, including the many "takes." This is not shared with cast.

Hey, I hope you and your family are well

I watched the selects you sent. So great. I was so happy and energized. Such solid work from everyone on and off camera. It was really cool to see. We were working so quickly, there was never the time to look back. So it was nice to revisit from an audience's perspective.

Please let me know who to reach out to get to access to the full gallery of dailies. I'm so looking forward to seeing all we have in the can.

And of course, any scenes you cut together, I'd love to see.

Hope you're having a good summer. And hopefully a good edit. Will your assembly be done soon?

X

From: [REDACTED] Blake Lively  
To: Justin Baldoni [REDACTED]

Priority: Normal

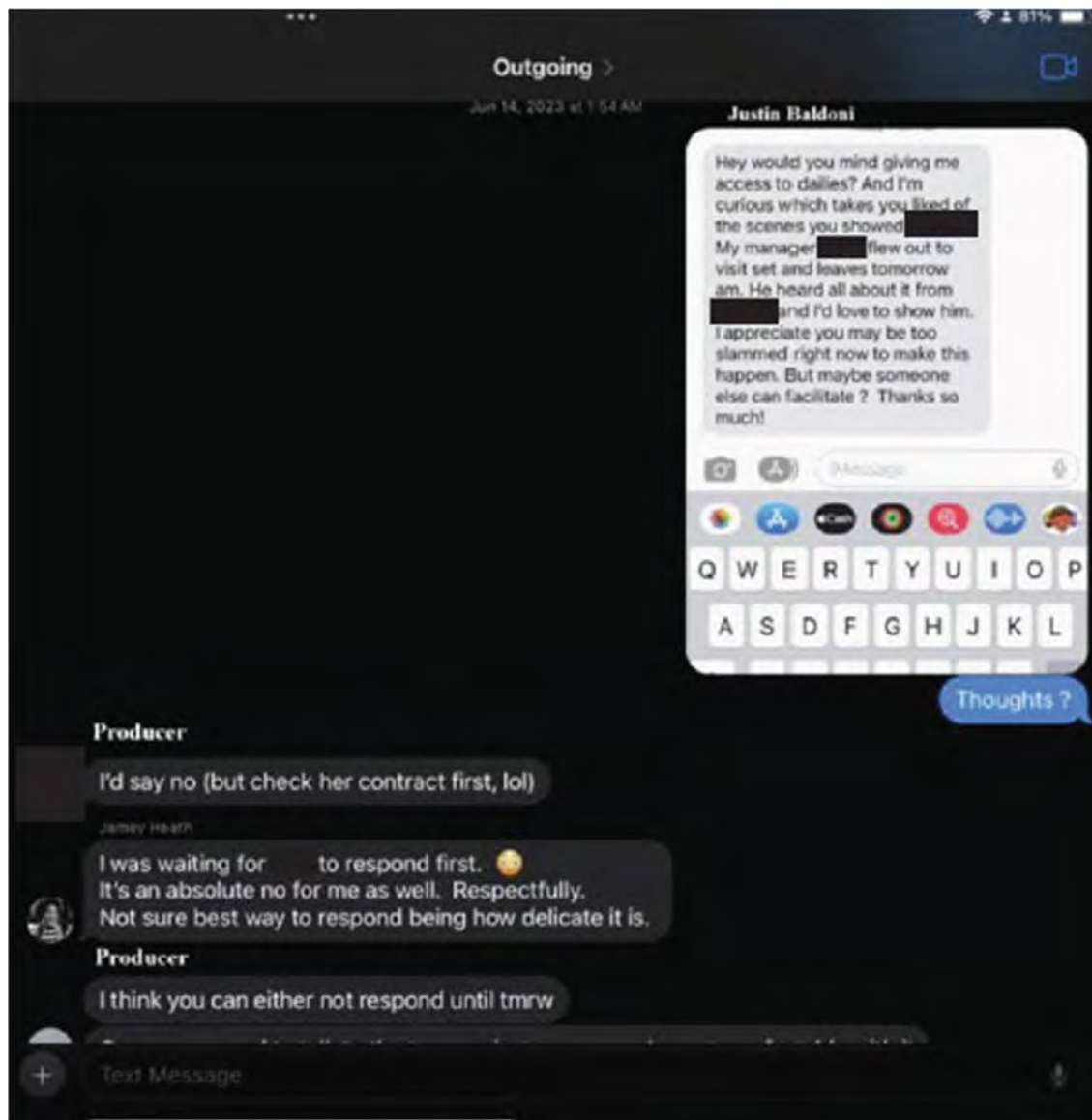
Participant	Delivered	Read	Played
Justin Baldoni	7/19/2023 2:30:17 PM(UTC+0)	7/19/2023 2:30:17 PM(UTC+0)	

Status: Read

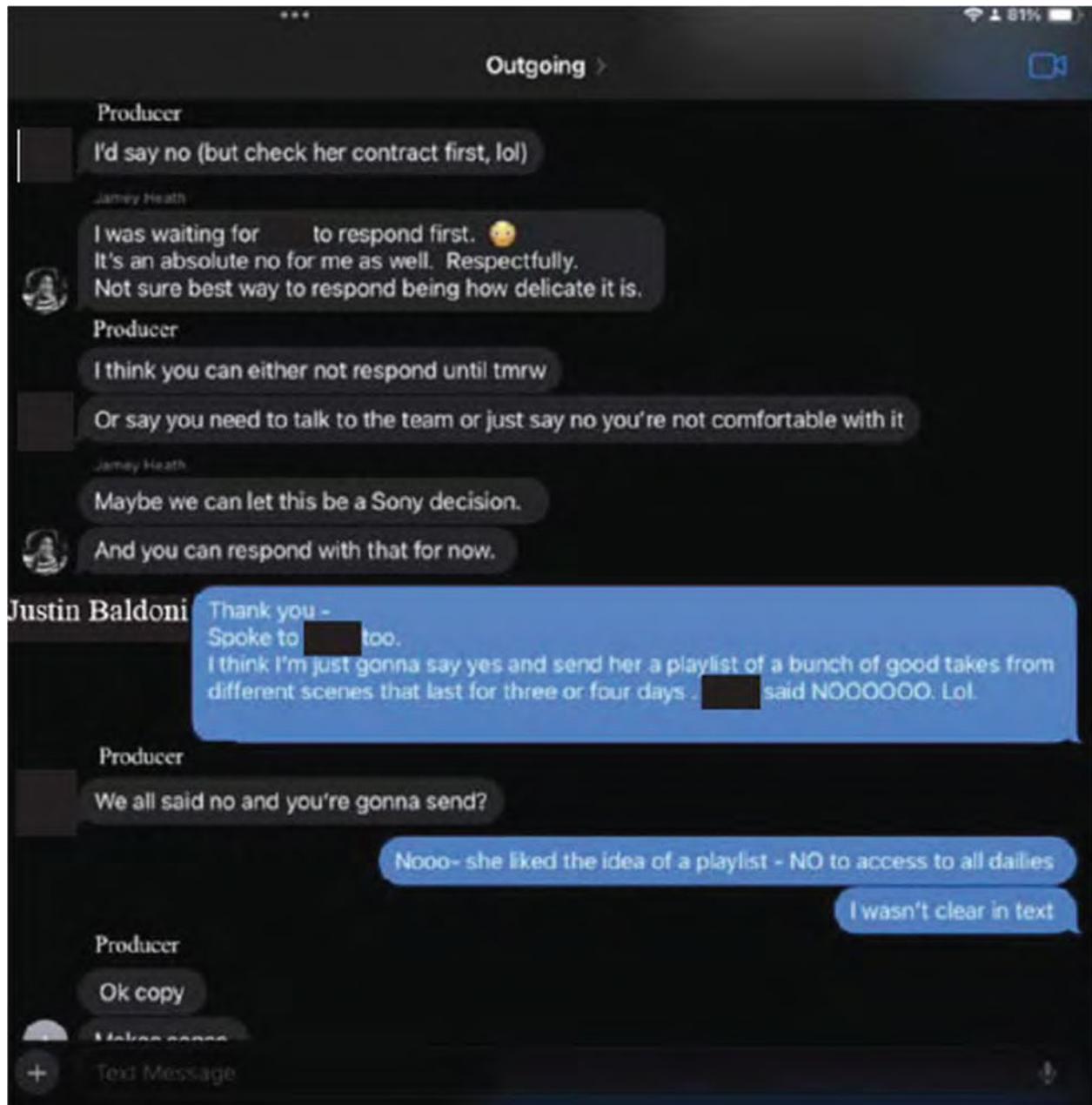
Platform:

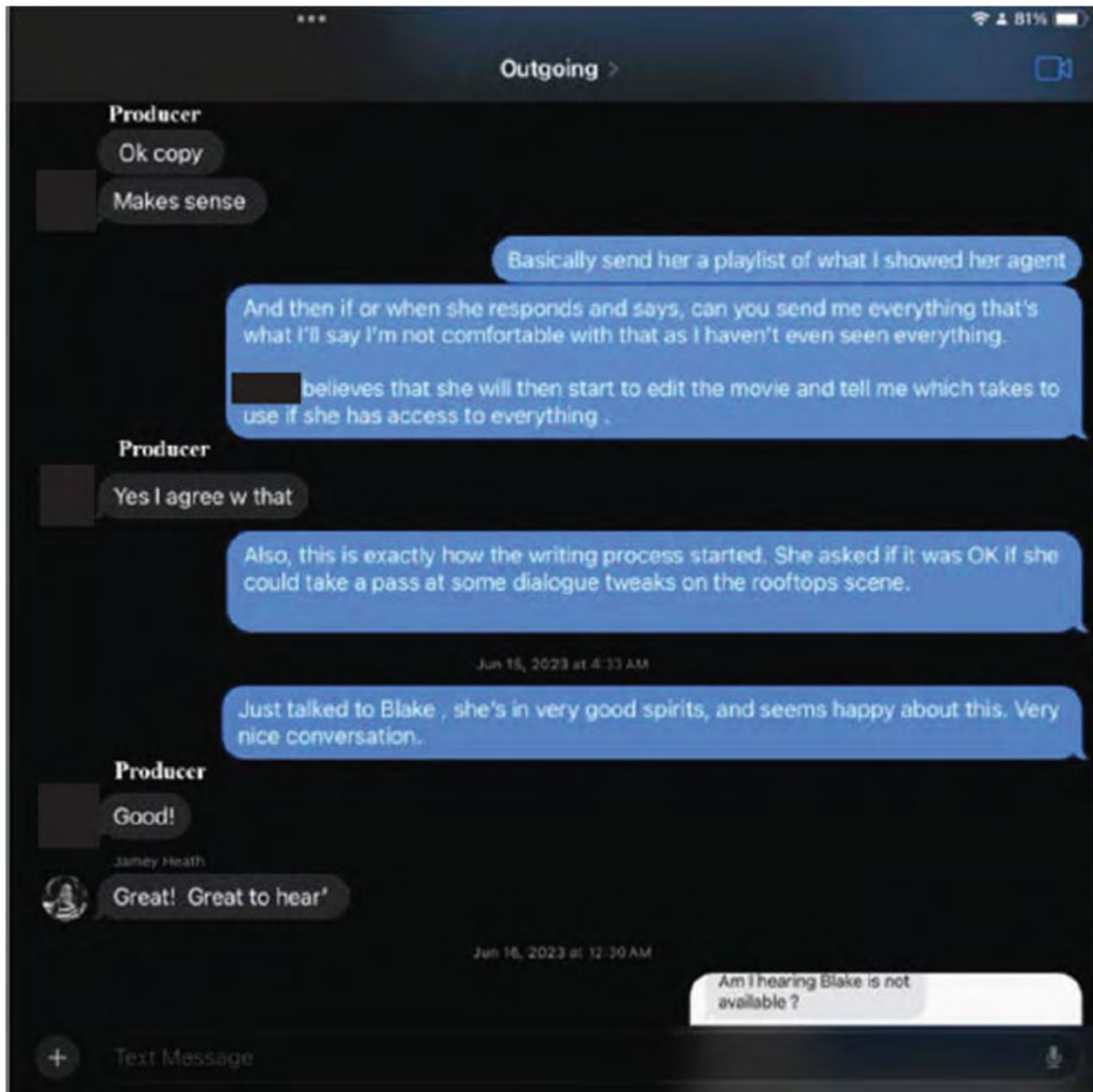
7/19/2023 2:09:35 PM(UTC+0)

69. Wayfarer, Baldoni, and another producer on the Film strategized about how to respond to Lively (which became common practice, so as not to trigger backlash from Lively). The text exchange below demonstrates adamant objections to giving Lively the dailies. Not only was it an inappropriate overreach, but there was a very real concern that a simple ask (such as rewriting a couple of scenes) would turn into a complete takeover (i.e. rewriting the script). They rightly feared that giving her the dailies could turn into her demanding to edit the whole movie (which is exactly what ultimately happened):









70. After consulting internally as to how to respond, Baldoni politely pushed back, explaining that it was much too early in the editing process to share much footage.



Hi, sorry for slow response. Yes family is good! Brutal being away for so long and happy we are finally together.

Lots happening. All good things overall. Had to hire new editors who I adore. They are going through everything now.

I'm so happy you felt energized by what you saw. Your performance is really really beautiful. Stunning actually.

Re dailies. Obviously you know I want your input, that's why I sent the 5 hour playlist, but at this point it's too early for me to share all the dailies. I start my cut in early August given the new editors, and still going through the rest myself. Also figuring out our shooting plan as I have to cut and combine and find ways to scale down for budget.

Once I am physically in the edit and have touched scenes myself I'd love to share with you.

I hope you enjoy this time off with your family. Talk soon

From: Justin Baldoni

To: [REDACTED] Blake Lively

Priority: Normal

Participant

Delivered

Read

Played

[REDACTED] Blake Lively

Status: Sent

Platform:

7/20/2023 4:51:04 PM(UTC+0)

71. At that point, Lively reluctantly paid nominal lip service to the notion that Baldoni, the Film's director, was entitled to the time and space needed for his directorial cut but continued to push:

I don't want to infringe on your time with your cut of course don't feel the need to send me cut scenes. I was just excited to see.

Re dailies— none of the producers have had access to dailies? It's just you?

From: [REDACTED] Blake Lively

To: Justin Baldoni

Priority: Normal

Participant	Delivered	Read	Played
Justin Baldoni	7/20/2023 5:35:23 PM(UTC+0)	7/20/2023 5:35:23 PM(UTC+0)	

Status: Read

Platform:

7/20/2023 5:02:17 PM(UTC+0)

72. Baldoni shared limited scenes with Lively, feeling uncomfortable all the while, yet he already knew that he had to bow to Lively's demands in order to get out the Film and its powerful message. Finally, he put his foot down, sending Lively one final scene and then telling her he would not be sending any more cuts until he was finished his editorial process.

Sorry back to back meetings.

All good. Love the excitement and im excited to show you when time is right

No not just me [REDACTED] and Jamey have access to dailies but not assemblies or cuts.

From: Justin Baldoni

To: [REDACTED] Blake Lively

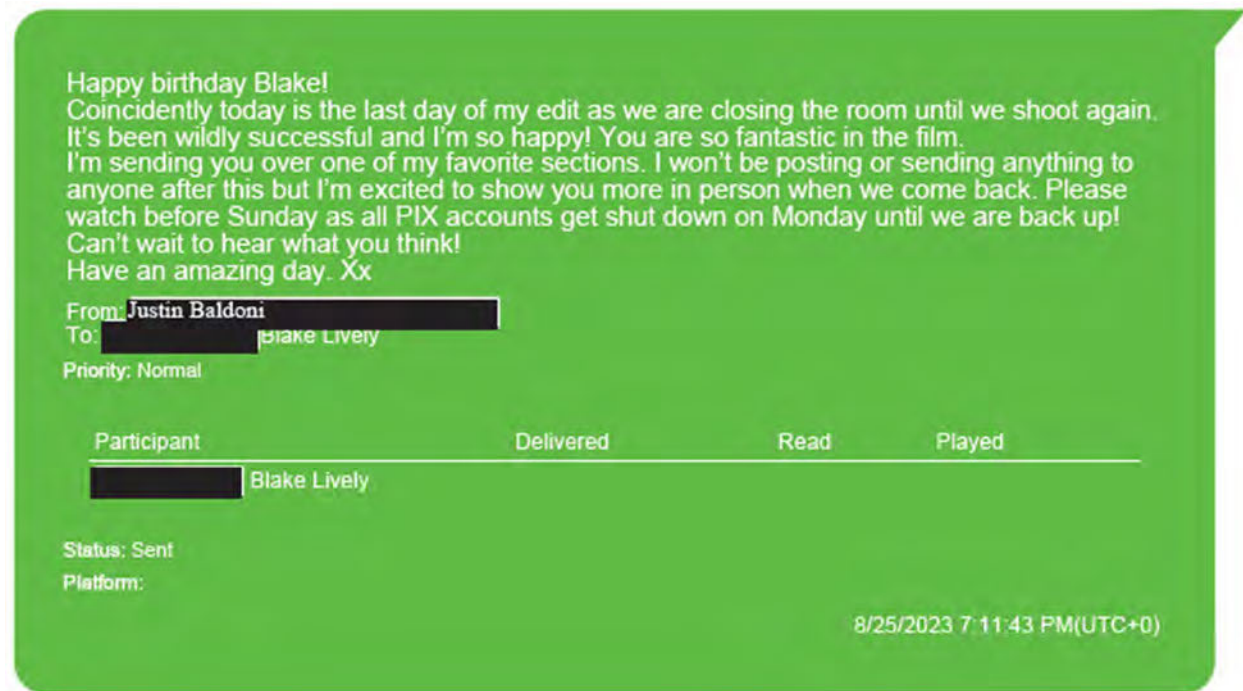
Priority: Normal

Participant	Delivered	Read	Played
[REDACTED] Blake Lively			

Status: Sent

Platform:

7/20/2023 7:32:29 PM(UTC+0)



73. The WGA strike ended on September 27, 2023, and the SAG-AFTRA strike ended on November 9, 2023. Months before, Baldoni had made Lively's representative aware that they would continue pre-production in order to "hit the ground running" when the strikes ended.

74. But Lively and her lawyers had been busy devising other plans during the strike.

75. The same day that the SAG-AFTRA strike ended, Baldoni, the studios, and producers were eager to resume production. Instead, they were met with an email from Lively's lawyer, who sent Wayfarer an unsettling and unexpected 17-point list of non-negotiable conditions that must be met before Lively would return to work. The stunning list was drafted for the apparent purpose of insinuating or outright claiming that Baldoni, Heath, and others had engaged in sexually inappropriate conduct during filming. Nothing could be further from the truth.

WAYFARER

**Lively - It Ends With Us - CONFIDENTIAL**

12 messages

Thu, Nov 9, 2023 at 2:14 PM  
To: Wayfarer Team  
Cc: [REDACTED]

Dear [REDACTED], Wayfarer Team

With the tentative resolution of the SAG-AFTRA strike, we are writing to address how to handle a return to the set of "It Ends With Us" (the "Film"). It is no surprise to the Film's producers that the experience of shooting the Film has been deeply concerning on many levels. The complaints of our client and others have been repeatedly conveyed and well-documented throughout pre-production and photography.

While we reserve all legal rights, at this stage our client is willing to forego a more formal HR process in favor of everyone returning to work and finishing the Film as long as the set is safe moving forward. In order for our client to feel safe returning to the production, we are attaching a list of protections that will need to be guaranteed and observed by the Film's producers. If the production is unwilling to accept or uphold these protections, our client is prepared to pursue her full legal rights and remedies.

This letter is not intended to constitute a full statement of all facts and circumstances relating to this matter. It is not intended to be, nor should it be construed as, a waiver, release or relinquishment of any of our client's rights or remedies, legal or equitable, all of which are hereby expressly reserved.

Sincerely,

[REDACTED] Lively's Counsel

[REDACTED]

 Please consider the environment before printing this e-mail.

76. Both Wayfarer and Sony attempted to revise the document to make it factually accurate (being that their representation of set culture was inaccurate) and sent comments through Wayfarer's attorney (who incorporated Sony's notes). But Lively's counsel's response made it clear that the list was not open for negotiation.

To: Wayfarer Team Mon, Nov 13, 2023 at 8:36 PM  
Cc: [REDACTED]

The list we provided was not intended as a starting point for a negotiation. Rather, it is a set of protections that needs to be in place in order for our client to return to work. Please let us know as soon as possible whether Wayfarer will agree to accept all of the protections included in our original communication (including without limitation #11 and #12) with the following additional clarifications:

- #14: In addition to the stunt double, Wayfarer to engage BL-approved body doubles for both characters for all simulated sex scenes.
- #15: This requirement applies to any future filming as well as to any footage that has already been shot.
- #16: We can limit this requirement to scenes involving nudity, partial nudity and/or simulated sex.

Thank you.

[REDACTED] Lively's Counsel

77. It was clear that Wayfarer would have to sign the document as-is, despite the falsity of its insinuations. The alternative was to lose millions of dollars, cost hundreds of people their jobs after they had been out of work for months, and destroy their relationship with Sony. Nonetheless, the demands themselves were agreeable; indeed, some were already in place.

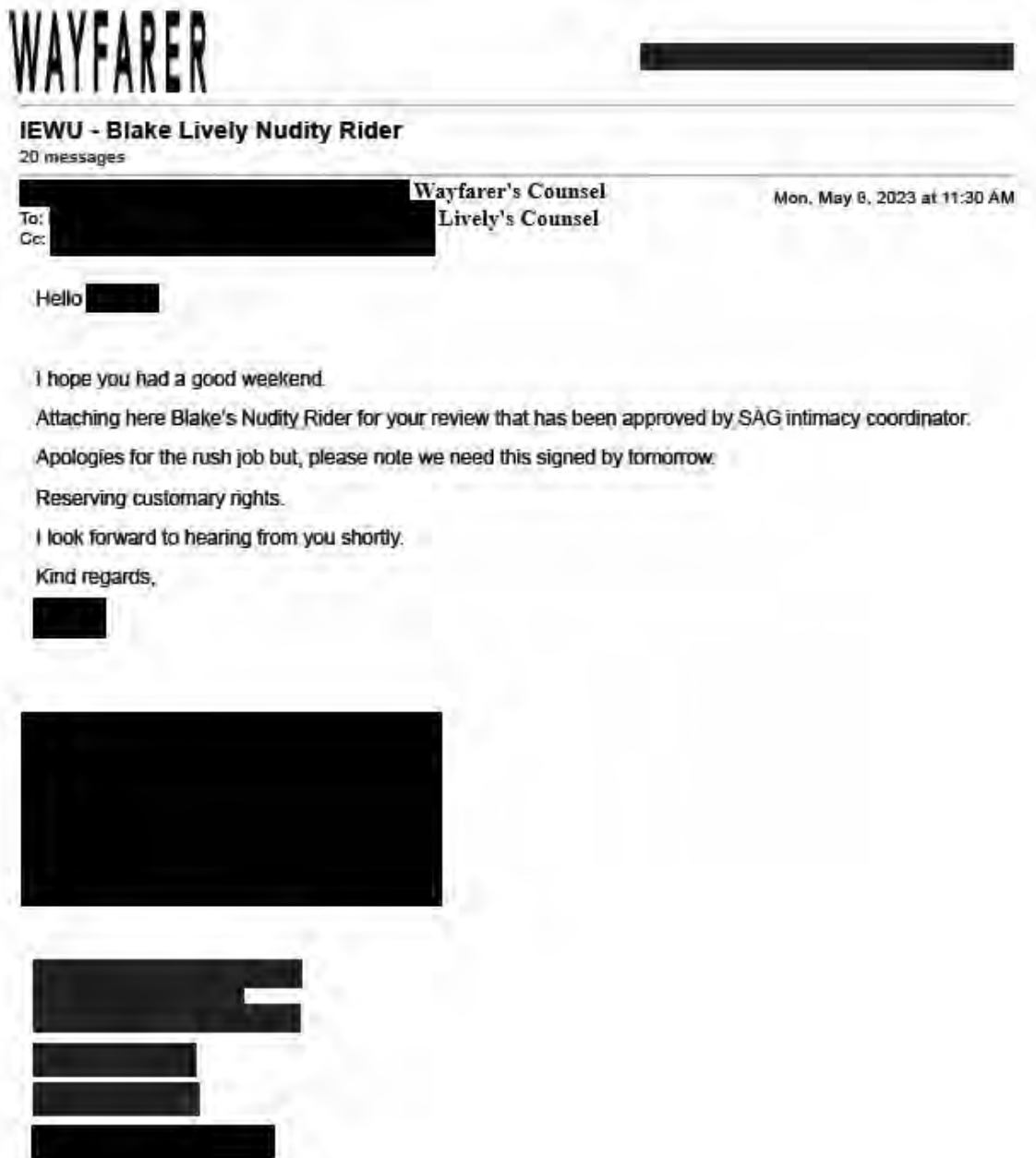
78. To illustrate the distorted and downright fictional bases for the 17-point list of demands, each of them is addressed in turn below.

**a. Point 1: Intimacy Coordinator**

79. Lively demanded that an intimacy coordinator be present at all times when Lively was on set. In fact, an intimacy coordinator *had already* been engaged during the first half of the production, so Wayfarer took no issue with this request itself, despite both Lively (and her attorney) knowingly insinuating there was not one. On or about March 20, 2023, nearly 2 months before filming began, Baldoni met with the intimacy coordinator and in early April of 2023, more



than 6 weeks before production commenced, she was engaged. Lively was aware, as Baldoni had informed her in writing, on or about April 6, 2023. Lively's attorney was also aware, as documented in May 8, 2023 emails between her and Wayfarer's attorney within which Wayfarer provides her the intimacy coordinator-approved Nudity Rider, followed by written confirmation of said approval.



To: [REDACTED] Lively's Counsel  
Wayfarer's Counsel Mon, May 8, 2023 at 1:46 PM

Hi [REDACTED]

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Do you have written approval from the intimacy coordinator for the exhibit that you can share?

To: Lively's Counsel Wed, May 10, 2023 at 9:03 AM  
Cc: [REDACTED]  
[REDACTED]

Hi [REDACTED]


Confirmation for [REDACTED] attached here.

Let me know if you need anything else at the moment.

Thanks!

---

Wayfarer's Counsel

 FW- Nudity Riders.eml  
8K

80. Although the presence of an intimacy coordinator is not a Screen Actors Guild rule but rather a recommendation, Baldoni was eager to engage one from the start to ensure talent, *himself included*, felt safe during intimate scenes. It was also important to him that the intimacy coordinator be a woman, to help craft sex scenes that would speak to the mostly-female audience



of the book, i.e. be written from the “female gaze” – a fact Lively later mocked in both her Complaint and her CRD Complaint.<sup>14</sup>

81. Given both Lively and Reynolds’ first-hand knowledge of these facts, Lively’s insistence in her November 9, 2023 “Return to Production Demands” on the constant presence of an intimacy coordinator was baffling; however, because Wayfarer had already engaged an intimacy coordinator and had no issue with the request, and given the request came with the threat that Lively would not come back to work after months of filming and planning, Wayfarer acquiesced. This acquiescence, given with the written caveat that Wayfarer disagreed with the characterizations, was later used by Lively to falsely suggest an acknowledgement that there had not been an intimacy coordinator at all.

**b. Point 2: Limiting Review of Intimate Scene Footage to Those with Essential Business Reasons**

82. Given that this was already standard practice in the film industry and in practice on the Film’s set, Wayfarer readily agreed to this demand, though without any reason to believe that the demand was made in response to any inappropriate conduct. Despite having filmed for over a month and despite having been provided a Nudity Rider and the opportunity to negotiate, finalize, and sign, Lively had never asked for a “closed set”. However, Production had always adhered to this and had no problem agreeing to this demand. For clarity, no intimacy scenes were even shot prior to the Nov. 9, 2023 Return to Production Demands; therefore, under no circumstance did Lively shoot intimate scenes “without a nudity rider”, as suggested in her Complaint, and production did *not* violate any SAG-AFTRA rules. The one simulated nude scene filmed prior to the strike break and the Nov. 9, 2023 Return to Production Demands was a scene that Lively wrote,

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<sup>14</sup> *Lively v. Wayfarer Studios LLC et al.*, Case No. 1:24-cv-10049 (S.D.N.Y. Dec. 31, 2024) (Dkt. No. 1, ¶ 50); CRD Complaint, ¶ 34.

knew of in advance, and directed the action for, and she never requested a nudity rider or intimacy coordinator for that scene.

83. This demand, as written, suggests nude or intimate scenes were filmed with non-essential personnel present. Later in her complaint, Lively alleges that during a scene (the “Birthing Scene”) she was “mostly nude with her legs spread wide in stirrups and only a small piece of fabric covering her genitalia,” and that there were “non-essential persons” present.<sup>15</sup> This allegation is knowingly false. To begin with, to describe Lively as “mostly nude” and “naked from below the chest down” is dishonest.<sup>16</sup> Lively was wearing black briefs and a pregnancy suit that covered her midsection, and her top was covered by a hospital gown. Her legal complaint<sup>17</sup> *deliberately* suggests she was wearing “a small piece of nude fabric glued around [her] genitalia” by stating this is “generally” what female actors use to “provide some minimal privacy without disturbing the shot...”, leaving the reader to believe Lively was only wearing this small fabric. Lively was aware of this birthing scene as she was heavily involved in writing (rather, rewriting) the script and gave creative input for this specific scene (even against the director’s creative vision).

84. Moreover, film footage clearly demonstrates that the set was *not* chaotic, as she alleges, and only “essential” individuals (e.g. film crew, talent) were present for the scene and doing their jobs. Importantly, Lively knowingly and falsely alleges that the Film’s financier was present during these scenes, and insinuates he was watching her nude (which he had no desire to do). He was *not even on set* during the filming of that scene. He arrived later, merely stopping by for a brief moment amid his busy business schedule, and was present during the filming of a scene

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<sup>15</sup> *Lively v. Wayfarer Studios LLC et al.*, Case No. 1:24-cv-10049 (S.D.N.Y. Dec. 31, 2024) (Dkt. No. 1, ¶ 52).

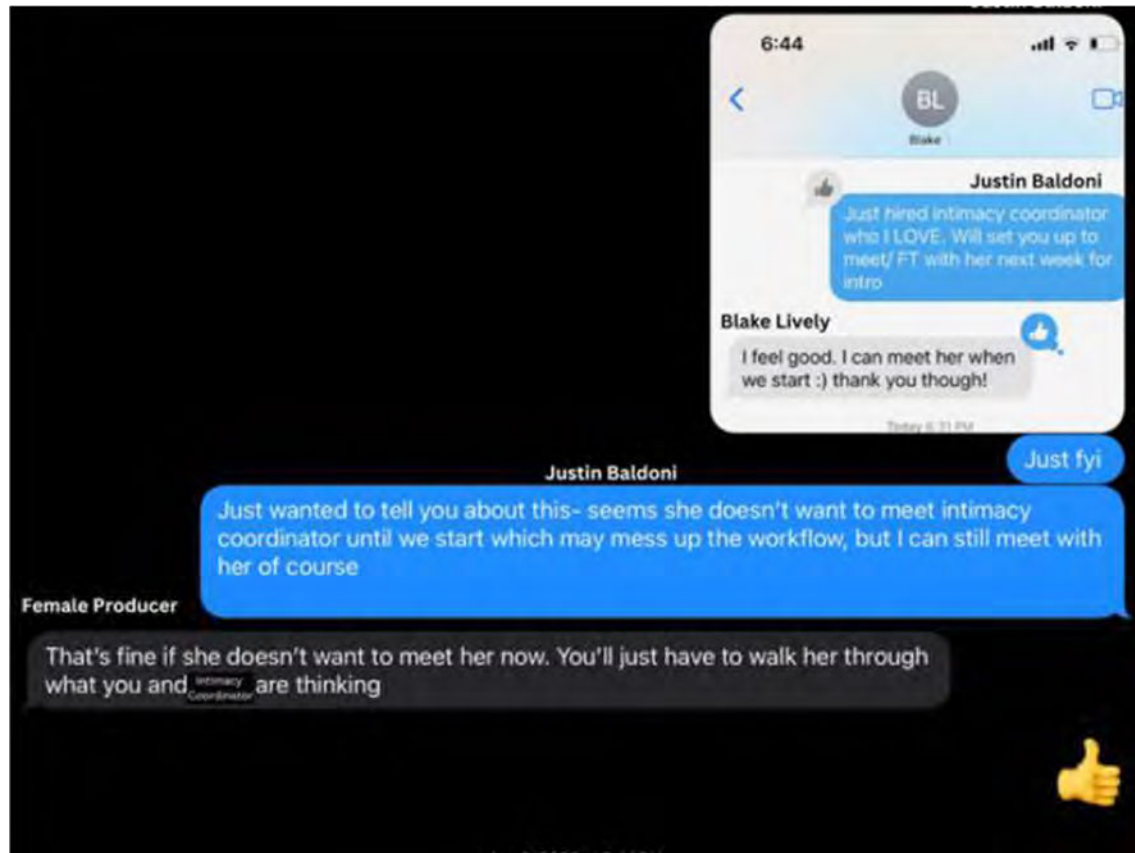
<sup>16</sup> If Lively is referring to her character being “mostly nude” (i.e. her pregnancy suit was exposed), her statement is misleading, and still false. The only nude body part exposed were her legs.

<sup>17</sup> *Lively v. Wayfarer Studios LLC et al.*, Case No. 1:24-cv-10049 (S.D.N.Y. Dec. 31, 2024) (Dkt. No. 1, ¶ 51, fn. 8).

in which Lively's character spoke with a female OB-GYN doctor – a scene in which she was *fully clothed*.

**c. Point 3: No Spontaneous Improvisation of Scenes Involving Physical Touching, Simulated Sex, or Nudity, Which Must Be Choreographed With Intimacy Coordinator**

85. Contrary to Lively's knowingly false claims, it was **Lively** who refused to meet with the intimacy coordinator to plan out their scenes, putting Baldoni in the awkward position of meeting alone with the intimacy coordinator and later relaying sex scene suggestions and plans to Lively in the intimacy coordinator's absence. These meetings often took place, at Lively's insistence, in the couple's home, and often while Lively's husband was present. Lively's method of work was unconventional and uncomfortable for Baldoni. To suggest Baldoni was the one who created this scenario is knowingly false.



86. As a result, many sex scenes were not written with simultaneous collaboration and input from both Lively and the intimacy coordinator, as Baldoni had long intended (the “female gaze” that Lively distorted in her CRD Complaint and, on information and belief, circulated to the *New York Times* for its publication weeks before filing her complaint with the Court). In the end, Lively rejected all of the intimacy coordinator’s proposals to rewrite the scenes herself.

87. Most egregiously, Lively later used these circumstances, *created entirely by her*, to accuse Baldoni of insisting Lively do “uncomfortable” or “gratuitous” scenes – scenes that were in fact proposed by the intimacy coordinator and by all accounts very typical asks of any actor performing simulated sex scenes. This is well-documented in handwritten notes Baldoni took during meetings with the intimacy coordinator and later read to Lively. Lively, in her recent allegations, misrepresented these ideas as personal, despite the fact that they were workshopping scenes *for their characters*. Lively’s inability to discern the basic premise of the divide between collaborating on a film and personal interactions with her co-star and director is woven throughout her claims of sexual harassment.

88. In support of what Lively positioned as the impetus for these demands, she alleges Baldoni personally added “graphic content, including a scene in which Ms. Lively was to orgasm on camera.” This is false. During a creative meeting, which Lively requested to take place in her home, Baldoni *read to her his notes from the intimacy coordinator*, including a suggestion that Lively’s character orgasm during the scene, similar to the book. Lively remarked, “oh no, I’m too old for that” and Baldoni offered another suggestion instead, *also from his notes from the meeting with the intimacy coordinator*. Baldoni then moved on.

89. Lively's later complaint sheds light on what this point was alluding to in this demand, which at the time was baffling and, upon review of the filmed evidence, is unequivocally based on a lie. Production was filming a "romance montage" of Lily and Ryle on their date. One of the producers played music to set the mood so the characters could slow dance. Lively, consistently unable to take direction, insisted she really liked the idea of the characters constantly talking, because, as she described, she and her husband like to "keep talking and talking and talking." Baldoni, her director, and the film's assistant director (who was directing the scene) disagreed. In an attempt to encourage her to take his direction, Baldoni offered up that he and his wife often just look into each other's eyes silently, to which she responded, "Like sociopaths," and laughed. Baldoni laughed and shook it off, while Lively once again started talking about how she and her husband can't *not* talk. Baldoni said, "I think that's cute," and complimented the couple, to which Lively responded, "I think it's more than cute."

90. Lively continued arguing and tried to direct *him* for the scene. while they were supposed to be in character filming the scene. At some point Heath and another producer, irritated, called Baldoni aside to express they can't capture the intended "shot" because Lively wouldn't stop talking. He was instructed to *somehow* get her to stop. While there was a brief verbal exchange, Baldoni, heeding the instruction of their Assistant Director and producers, continued to try to bring them back into character. As they were acting in this montage scene, Lively continued to break character and speak as herself rather than as Lily, which was extremely confusing for Baldoni, who was trying to balance directing the scene within his artistic vision while also acting in character while filming and trying to get Lively to do the same. Lively apologized for the smell of her spray tan and body makeup. Baldoni responded, "It smells good," and continued acting, slow dancing as he believed his character would with his partner, which requires some amount of

physical touching. Lively took them out of character again and joked that Baldoni should undergo a rhinoplasty; Baldoni laughed it off.<sup>18</sup> Lively incorrectly alleges that this scene was filmed without sound. Baldoni was wearing a microphone, and the entire exchange was captured on camera. The actual footage belies any suggestion that this scene was filmed unprofessionally. Lively's allegation that sexual harassment took place is unequivocally false.

91. Moreover, it was *Lively* who engaged in unchoreographed kissing scenes. One scene, again captured on camera, exhibits *Lively* pulling Baldoni in to kiss her. It is clear Lively was initiating unchoreographed kissing: In one take, she pulled Baldoni in and kissed him once; in another twice, and the number of kisses, entirely initiated by Lively, changed at her whim. Baldoni, as a professional actor who, among other roles, played the lead's love interest in television's *Jane the Virgin* for 5 years (100 episodes), is, like most actors, accustomed to rehearsing or filming scenes multiple times – often with variations - without needing “permission” while in character. While Lively now takes issue with any innocuous improvisation Baldoni, as Ryle, may have allegedly initiated while in character, Baldoni treated their relationship on camera as professional; each playing their part, each doing their job. If no one was supposed to improvise, Baldoni would have no way of knowing based on Lively's own actions. Lively demonstrated, again and again, that this was a normal and acceptable part of filming romantic scenes.

92. Lively also complains that there was inappropriate and improvised kissing during the first period of filming, before the strike break. But in fact, the only two kissing scenes filmed during the initial filming period were both scenes that included kisses as written in the script. These kissing scenes were not improvised.

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<sup>18</sup> Lively alleges Baldoni inappropriately commented on *her* physical appearance. It was the other way around.

**d. Point 4: No Physical Touching of Lively (Including Hugging) or Comments on Her Physical Appearance Except in Connection with the Character and/or Scene Work, Not as to Lively Personally**

93. To be clear, none of the named parties touched Lively when not in character, especially not in the manner suggested.

94. While Baldoni and Wayfarer clearly agreed that coworkers should respect physical space, Lively's constant confusion of references to her character as played by Lively, as opposed to Lively herself, became problematic and interfered with production. This was caused in large part by Lively's persistent desire to direct and inability to accept direction. For example, her allegation that Baldoni inappropriately called her "sexy" was in fact a reference to a scene where everyone was wearing "onesies", but Lively was covering her onesie with a big coat. Baldoni, her director, asked that she take off the big coat so that her "onesie" would be visible in the scene.<sup>19</sup> Baldoni said, "it will be hot" as it was 90 degrees in the small bar with no air conditioning. Lively mischaracterizes this in her Complaint as Baldoni referring to *her* (personally) as "hot" (using the slang meaning of the term). Given that Lively herself had earlier expressed to him that she wanted her character's wardrobe to be "sexier," Baldoni encouraged her to accept direction by saying "it's sexy," meaning that without the big coat the wardrobe was "sexier" as Lively had said she wanted it to be. Lively took this personally. She was unable to take the direction (later alleging his behavior was inappropriate) regarding her self-chosen wardrobe, stating, "that's not what I'm going for." Baldoni, recognizing that she may have taken his direction personally and appeared offended, apologized more than once. His statements were immediately followed by his gesture that she had something in her teeth, and a request for someone on set to get her a toothpick. This exchange, *all*

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<sup>19</sup> This is documented on-camera while filming.



*of which is captured on camera*, demonstrates how ludicrous and deliberately malicious Lively's allegations are.

95. While on the one hand, Lively accuses Baldoni of making comments about her appearance, on the other, she made fun of aspects of Baldoni's appearance, including the size of his nose – something Baldoni has publicly expressed insecurities about and has discussed on an episode of his podcast, *Man Enough*, exploring the topic of body dysmorphia. Lively's comment about Baldoni's nose—advising him to get a nose job—was captured on camera. Baldoni, rather than adding it to a list of grievances, brushed it off and moved on with the scene.

96. Baldoni's sincere dedication to what he has repeatedly described as holding himself accountable as a man was being used against him, just as Lively is attempting to do now. To characterize his sensitivity to *her* personal reaction to his creative direction, which was not only innocuous but well intended, is malicious. To then share this knowingly false characterization with the *New York Times* for publication months before filing any formal complaint, then waiting nearly two weeks to file the complaint with this Court (thus depriving him the opportunity to engage in discovery before the damage is done), is inexcusable.

97. Despite the flawed factual premise underlying Lively's demand, in the face of Lively refusal to return to work, Wayfarer agreed to this condition.

**e. Point 5: No Discussion of Personal Experiences with Sex or Nudity,  
Including as it Relates to Conduct with Spouses or Others**

98. When Baldoni was faced with this demand, he was utterly confused. By the time Lively and Baldoni were developing their intimate scenes together, they had developed a friendly relationship and were communicating often over text message. Lively felt comfortable expressing herself and appeared to do so freely. She took photos of Baldoni holding and comforting her

newborn in her home. Baldoni filmed her uncontrollably laughing with him as they rehearsed late into the evening, often delirious with exhaustion. Nothing about their interactions suggested Lively was uncomfortable around Baldoni. Though confused by this demand, and denied the opportunity to revise the Return to Production Demands to make them factually accurate and less misleading, Wayfarer had no choice but to sign the document and did so, knowing no such instances had occurred.

99. Later, Lively references in her Complaint instances that were shockingly mischaracterized and in no way inappropriate or unprofessional.

100. For example, in response to a proposal from the intimacy coordinator that Baldoni's character Ryle not orgasm after he satisfied Lily, Lively remarked, "I'd be mortified if that happened to me," personalizing the characters' sexual act. Baldoni, following Lively's lead in what he understood to be an attempt to connect with and develop their characters, remarked that "those have been some of the most beautiful moments" between himself and his wife. They then moved on. In another instance, as Lively and Baldoni were developing their scenes, Lively said, "I don't want it to look like porn" and then offered up that she had never seen porn in her life (a very personal fact). Baldoni complimented her and said "that's wonderful" because unfortunately he was first exposed to it when he was ten years old, and struggled with a porn addiction for a period of his life; he writes openly about this in both his books *Boys Will Be Human* (written for young boys) and *Man Enough* (written for men), addressing pornography as a societal problem. Anyone who knows or has done any research on Baldoni would have knowledge of this, and it can in no way be characterized as inappropriate, *especially* after opening the door to the discussion by disclosing something highly personal. At every turn, Baldoni was entrapped. Moreover, Heath,

who had nothing to do with this exchange and *has never* had a porn addiction or even mentioned porn in Lively's presence, was falsely and knowingly lumped into this accusation.

101. Lively continued with an outrageous and knowingly false suggestion that she was shown pornography or naked images of Heath's wife on set. This allegation knowingly and maliciously misrepresents an instance when *in connection with the birthing scene*, Heath, at the director's request, attempted to show Lively *a video that demonstrated the director's vision for the scene*. This video, which ultimately was *not* shown to Lively (even though she stated she'd like to see it later, as she was eating) is by all accounts beautiful. Since Lively wanted to see it later, what she saw was the first image at the start of the video, which shows Heath's wife, himself, ***and their baby*** after his wife gave birth at home (a "natural birth" or "home birth"). To characterize this image that captures such a beautiful moment with their newborn baby, shared with the consent of his wife for purposes of the Film, as a naked photo, or worse, "porn," is deplorable. Nonetheless, Lively did not object and asked to see the video after she ate, having managed to "convince" the director to write and shoot the scene according to *her* specifications.

102. These brief exchanges were distorted beyond recognition in the 17-point list of "Return to Production Demands" that Lively served on Wayfarer.

103. Still, without conceding that anything remotely inappropriate had happened, Wayfarer agreed to this condition so that they could resume production.

**f. Point 6: No One to Enter Lively's Trailer While She Was Undressed**

104. The suggestion that this ever happened is illogical and categorically false. No one would or did enter Lively's trailer without knocking first and asking permission. More than once, Lively invited Baldoni, Heath, and other producers into her trailer so that she could multi-task, understandably balancing motherhood with her work obligations. Regrettably, while

accommodating Lively, Baldoni and Heath were led into situations that would later be characterized as harassment. Lively herself invited Baldoni to her trailer to “work on lines” while she pumped breast milk. Lively regularly breast-fed in front of Baldoni while they had meetings. Heath was invited into her trailer for a meeting at her request while she was having makeup removed from her collarbone because she was not able to meet at another time. Her nanny, makeup artist, and assistant were present, and Lively was not topless, as she claims elsewhere, but was fully covered while either nursing or pumping breast milk. In this instance, he was instructed to turn away while they spoke and respectfully did so, while they figured out a time to meet with the other producers standing just outside the door and as Heath pleaded with Lively to have the meeting the next morning to avoid her getting home late and losing shoot time the following day. While it is possible he inadvertently made eye contact at one point, he does not recall. Lively later mentioned he did, and it made her uncomfortable, to which he responded, “I’m so sorry, I really didn’t realize.” Lively responded, “I know you weren’t trying to cop a look,” and they moved on.

105. Lively’s suggestion that not one, but two professional and conscientious men barged into her trailer several times, or attempted to enter or pressured her to allow them to enter, offends not only their long-established integrity, but the sanctity of their vows to their wives and their dedication to their children and families. Lively is aware that both men are incredibly supportive and respectful of motherhood, to say the least. Heath’s wife is a vocal advocate for postpartum mothers. Baldoni’s wife co-founded a company that designed a breast-feeding garment, a prototype that originated with his mother when he was an infant. Baldoni had gifted Lively one. While those facts would never be an excuse for barging in unannounced, it is indicative of the nature of their relationship with and respect for women. Simply put, such allegations are categorically false claims that would have been wildly out of character if they were true.

**g. Point 7: No Filming Nude or Sex Scenes Except Per Nudity Rider, and  
No Use of Prior Nude Scenes Without Nudity Rider**

106. Lively was provided a Nudity Rider, approved by the SAG Intimacy Coordinator, and was given ample opportunity to provide notes before production commenced. Despite constant pursuit over several months, Lively's attorney never produced notes, and Lively not only didn't sign the Nudity Rider during the first phase of production but never even signed her employment agreement. Her main concern while Wayfarer's lawyers were all but begging for signatures was ensuring her fee was deposited into escrow. In order to move forward, they had to pay her fee even though she hadn't signed her agreements.

107. The Screen Actors Guild ("SAG-AFTRA") states that producers must provide actors at least 48 hours' notice before call time to review and negotiate a nudity rider. A Nudity Rider approved by the SAG-AFTRA intimacy coordinator working on the production was provided to Lively's counsel on May 8, 2023. Wayfarer's attorney communicated that they would like it signed by May 11, 2023 and requested they send any notes they may have. On May 12, 2023, Lively's attorney finally responded that they were reviewing the Nudity Rider and would come back with notes. Their focus then shifted to ensuring Lively's fee was deposited in escrow, and they became fixated on that, despite Wayfarer's repeated requests for Lively to sign the customary Certificate of Engagement<sup>20</sup> first. Ultimately, despite constant pursuit, it became clear that Lively had no intention of signing the Nudity Rider or her contract at that time.

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<sup>20</sup> When working with an actor who may take time to sign the main actor agreement, it is customary to send a certificate of engagement to protect the copyright of the film. Wayfarer negotiated the terms of said certificate of engagement but, though it was approved by Lively's counsel, never received a signed copy.

Wed, Jul 5, 2023 at 6:33 PM

To: Lively's Counsel  
Cc: [REDACTED]

Hello [REDACTED]

I hope you enjoyed the 4th of July.  
Very confused at what's going on here. Escrow was made in good faith and we still don't have a signed COE that has been confirmed for almost 2 months. Also, we still don't have the SAG start paperwork, which has been outstanding for

over a month. Lastly, please confirm the last 2 payments are still being held in escrow.  
Thanks.

[REDACTED] Wayfarer's Counsel

108. Months later, the demand for a Nudity Rider became a part of the 17 demands, and presented as if it were Wayfarer, and not Lively, who was the cause of its absence. The demand also stated that “any footage **previously** shot without the Nudity Rider in place” may not be used without Lively and her legal representatives’ consent, *despite the fact that no simulated sex had been filmed yet*. In fact, only one scene involving simulated nudity had even been filmed, and it was a scene that Lively knew of well in advance, given that *she wrote it herself*, knew when it would be filmed, and directed the action herself, never requesting a nudity rider or an intimacy coordinator.

**h. Point 8: Lively Entitled to Personal Representative on Set**

109. Wayfarer had no objection to allowing Lively a personal representative on set.

**i. Point 9: Notice of COVID-19 Exposure**

110. On April 26, 2023, weeks before principal photography of the film commenced, Wayfarer sent crew a “Covid-19 Protocol Update” informing them that the AMPTP Return to Work Agreement expires on May 12, 2023, and as such, there would be no preemployment testing and no mask requirements after May 12, 2023.

111. Although the AMPTP Return to Work Agreement that established Covid protocols expired prior to the start of principal photography and no testing or masking was required, Wayfarer agreed to inform Lively if production became aware that she was exposed to Covid.

**j. Point 10: No Retaliation for Requests**

112. While Wayfarer in no way conceded that Lively's demands amounted to a report of genuine sexual misconduct, Wayfarer had no interest in retaliating against Lively for making these demands. Their only desire was to make a great movie. In the interest of maintaining a professional and productive atmosphere on set, they agreed to meet all of her demands, including a broadly defined statement that they would not retaliate in any manner (including "sarcasm"). Wayfarer agreed, though later it became clear that Lively would consider any future effort to push back against her demands with respect to the production as unacceptable "retaliation." On information and belief, this demand was included to safeguard Lively not from retaliation, but to secure her place as "leader" of the Film with the threat of claims of retaliation if Wayfarer or Baldoni pushed back.

**k. Point 11: Mutually Agreed Sony Representative Required on Set**

113. Wayfarer agreed to the concept of having a Sony representative on set whenever Lively was on set, though it gently pushed back on the idea that it always be Ange Giannetti, who might occasionally have other pressing work obligations. Overall, however, Wayfarer agreed.

**l. Point 12: Additional, Lively-Approved Producer to Be Hired to Supervise Filming**

114. Wayfarer pointed out that the additional expense and the contractual implications of hiring an additional producer would have detrimental effects on the production. In the end, Wayfarer agreed, as it would cost production more if Lively refused to return to work.



115. Todd Black, suggested by Sony and approved by Lively, was ultimately brought on as an additional producer.

**m. Point 13: Existing Third-Party Producers Empowered to Actively Supervise the Production**

116. While disagreeing with the suggestion that any producer did not have “appropriate and customary authority to actively supervise the production” in their capacity as producer, Wayfarer agreed to this term; any third-party producer was *already* empowered to do so.

**n. Point 14: Wayfarer to Use Lively-Approved Body and Stunt Doubles for Intimate and Sexual Violence Scenes**

117. Despite not requesting this at the contract negotiation phase, Lively’s pre-approved stunt and body doubles were fully acceptable to Wayfarer and so they agreed, despite the fact that was an additional and unplanned expense to the Film. Ultimately, no body doubles were used in the Film, at Lively’s request. Lively and Baldoni displayed a courteous and professional relationship throughout phase two of production.

**o. Point 15: No Filming Nude or Sex Scenes of Any Actor’s Portrayal of Lily Except Per Nudity Rider, and No Use of Prior Nude Scenes Without Nudity Rider**

118. This was an overstep: an attempt to expand Lively’s right to her own Nudity Rider to assert control of the Nudity Rider for another actor (the actor who portrayed young “Lily”). While seeing this as infringing on the young actor’s independent right to her own Nudity Rider, Wayfarer, once again, was forced to agree, while informing Lively that “Young Lily” had already filmed her intimate scenes pursuant to her own Nudity Rider.

**p. Point 16: All Day Players Must Be Hired Through Talent Agencies, Not Personal Connections**

119. This point appeared to relate to Lively’s misleading claim that Baldoni inappropriately cast a personal friend to play the obstetrician during Lily’s birth scene. Baldoni casting an experienced actor who happens to be a friend is no different than casting Lively’s sister, who was cast *because* she is Lively’s sister. The actor portraying the obstetrician is an award-winning Shakespearean-trained actor with an MFA in Acting from UCLA, and in addition to appearing on numerous hit television shows, has toured nationally with a Tony Award-winning acting company and attended Oxford’s acting program on full scholarship. His accolades and performances speak for themselves. Lively’s current complaint states she was “alarmed” when Baldoni introduced him as his friend, and allowed him to play this “intimate role, *in which the actor’s face and hands were in close proximity to her nearly nude genitalia*” [emphasis added], categorizing the experience as **invasive and humiliating**. It is Lively’s suggestion that a highly trained and experienced actor would have an unseemly interest in being in “close proximity to her nearly nude genitalia” (which, as previously established, was not nude or exposed), that is *inappropriate, invasive, and humiliating* to the actor.

120. To reiterate, Lively knowingly made a false statement that “only a small piece of fabric cover[ed] her genitalia” during the birth scene. In fact, Lively was wearing briefs during the scene and was covered by a hospital gown, and was wearing a pregnancy suit covering her midsection; this was not in any way a nude or partially nude scene.

121. Once again, Wayfarer agreed despite being wholly offended by this accusation.

**q. Point 17: All-Hands Meeting Before Production Resumes**

122. Wayfarer understood this request to be a sincere offer to meet and discuss the needs and preferences of Lively and other cast members to ensure comfort and security while filming a movie that dealt with difficult themes. In that spirit, Wayfarer readily agreed, believing that an opportunity to discuss concerns openly and to plan resuming production would be welcome. As will be established, Wayfarer's good faith belief could not have been farther from the truth behind this demand. Lively (with the support of her husband) used this demand to justify an ambush of Baldoni and Heath on the eve of the first day of filming in phase two of production.

123. Importantly, Sony (who also had a representative on set) found the 17 requests confusing as well:

**Sony Business Affairs** Fri, Nov 10, 2023 at 10:28 AM  
 To: Jamey Heam  
 Cc: [REDACTED]

Hey Jamey –

Took a look at this following our conversation. No change in my mind from what we discussed last evening –

- items 1 through 10, 15, and 17 are basically just “yes, of course.” Interestingly, I’m surprised that you all don’t already have a negotiated nudity rider in place given the subject matter and content in the book – or am I mis-interpreting her comment?
- items 11-13 I’d want to hear more about what is underlying and what she’s hoping to accomplish, respectfully of course, in the hope that some combination of the studio representative and the “empowerment” of Alex presumably (whatever that means – again, hoped for clarification), might mitigate the need to engage an additional A level producer.
- item 14 is another question mark since it sounds like she approved the engaged stunt double.
- and for item 16, I guess I’m confused about this one as well and why the engagement of day players has found its way on this list – perhaps some of the upcoming sensitive scenes involve day players/extras and this is an attempt to manage the perception of their “professionalism?” Anyway, again, another clarification point.

Further, as discussed, overall the tone of the response has to be part denying the underlying insinuations/allegations, but doing so in a way that doesn’t inflame or escalate further since most of what’s on the list Wayfarer is acknowledging/addressing. And of course, any unease on her part is of paramount concern to the production and you all are committed to working with her to ensure that she’s comfortable with the plan and execution of the next few weeks in order to complete photography.

Rightj?

I'm going to send a copy to folks internally, and ask that our production attorney offer any assistance to [REDACTED] and [REDACTED] with respect to the drafting, etc. that they may feel they need.

Best,

[REDACTED] Sony Business Affairs

[Quoted text hidden]

 Lively\_It Ends With Us\_ Ltr Nov 9 23.DOCX  
16K

124. Before returning to production, Lively had even more script notes and changes beyond what was already performed during phase one of production. In the face of these terrifying and false accusations couched as demands, as well as Lively's threat that she would not return to production, Baldoni realized he needed to cede control of the script to Lively as she wished. His Film would be taken from him by threats and coercion, and there was nothing to be done about it. In an email to his team containing the notes on his revised script, he expressed his sadness and frustration over Lively's takeover of a film that they spent years developing, writing, and funding. Having no energy left to fight, he sadly declared he "[wa]s waiving the white flag and submitting" and would give Lively "98% of what she wants." He also expressed serious concern over how to handle the intimacy scenes, given the accusations inherent in Lively's Return to Production Demands. Baldoni asked his producing partners to guide him, as he was rightfully afraid of the "risk [that] something innocuous or not to [Lively's] standards would very likely be used against [him] (as it already had)", continuing that "creativity is impossible in an environment shrouded by fear. By now we all know what she is capable of." Baldoni's fear of Lively's retaliation was palpable, but he was determined to "get the film to the finish line," for everyone involved.

WAYFARER

Jamey Heath

Notes on script- action plan

9 messages

Justin Baldoni

Wed, Dec 27, 2023 at 10:19 PM

To: Members of Production Team

Jamey Heath

Hey team.

Attached is a revised script with the below notes/ caveats in bold. This is not final as there are things we need to discuss and then implement.

Also, I have added in [REDACTED] our AD here to have eyes on this so he can digest at the same time as all of you. I've spent the better part of the last few days trying to figure this out. Everyone knows how I feel about all this and how angry I am that Blake has taken over our film and somehow re-wrote a movie we spent years developing, writing and funding. So yes... I am furious. And sad. But I will continue to get back up with a goal of getting us to the finish line.

I have come to terms with the fact that the only way out is through. I am waiving the white flag and submitting. I am going to give her 98% of what she wants. I'm sure none of us have the energy to fight anymore. The the team who has been working their ass off needs a shooting script on Jan 2nd.

So, here's where we are.

There are minor things I did to each scene, some I made notes on and tiny ones I didnt. Most of what I touched is below. The big issues are going to be intimacy, how and what we are shooting for those scenes - and how this script is going to be presented to her and with what notes. To that end, we all need to get on the phone and talk through it as the risk of something innocuous or not meeting her standards could and would very likely be used against me (as it already has) and creativity is impossible in an environment shrouded in fear. By now we all know what she is capable of.

125. A producer thanked Baldoni for his “thoughtful breakdown, . . . especially considering the circumstances”:

To: Justin Baldoni

Thu, Dec 28, 2023 at 9:25 AM

Cc:

Jamey Heath

Thank you for this thoughtful breakdown, JB, especially this week and especially considering the circumstances. I'm free after 2 PT today or before 12 PT

126. As producers continued to request the final shooting script (as they were just 4 days before commencement of filming), Baldoni worked hard with very limited time to rework the script and direction to meet Lively's demands, recognizing that they “[would] be in a negotiation

for what the final script looks like”; Lively’s demands continued to cause additional work, and stress for the production team:

**Justin Baldoni**

Mon, Jan 1, 2024 at 12:28 PM

To: **Member of Production Team**

Cc: Jamey Heath

Hey buddy, unfortunately it looks like we’re not gonna be able to send anything until Thursday night or so. I’m not quite sure how to handle but I’m doing these small rewrites and I’m gonna be sending back to the Producers and all of you and then they are going to send it to Blake, and then we will be in a negotiation for what the final script looks like

127. Meanwhile, on the day before commencement of the second phase of filming, Lively casually reached out to Baldoni, together with Heath and the Film’s producers, to meet in her home. Lively’s Return to Production Demands required a meeting before filming resumed. On the day before filming Baldoni, Heath, a Sony representative, the Film’s first assistant director, and two producers arrived with production binders in tow, excited to discuss details of resuming production. But Lively and her husband had a very different meeting in mind.

128. Lively brought Reynolds as her chosen “representative”—notably, she did not request any attendees from her union, the Screen Actors Guild. Together, Reynolds and Lively blindsided the rest of the group with a list of grievances, read aloud by Lively, that were as troubling as they were fictional. Reynolds then launched into an aggressive tirade, berating Baldoni in what Baldoni later described as a “traumatic” encounter. As Baldoni later said, he had never been spoken to like that in his life.

129. Reynolds demanded that Baldoni apologize to Lively for actions that had either never happened or had been grossly mischaracterized. Baldoni resisted apologizing for things he had not done, further enraging Reynolds. Everyone, including the producer Lively had asked the production to engage and the Sony representative, left the “meeting” in shock. The producer said that in his 40-year career, he had never seen anyone speak to someone like that in a meeting. The Sony representative said later that she often thought of the meeting and her one regret was not intervening to stop Reynolds’ tirade against Baldoni.

130. Baldoni and Heath left the meeting deeply unsettled by Lively and Reynolds' behavior and the power dynamics at play. It was clear to them that this was the latest escalation in Lively's concerted campaign of extortion to extract concessions and creative control over the Film, a campaign now apparently joined by Reynolds. Nonetheless, faced with persevering in the face of extortionate threats versus shutting down a film halfway through production (with all the attendant financial and reputational implications), Wayfarer had virtually no choice but to resume production and finish the Film despite the newfound certainty that Lively was intentionally manipulating, distorting, and inventing "facts" to use as a cudgel against Wayfarer. The stakes could hardly have been higher for Wayfarer: Financiers had invested substantial resources, hundreds of cast and crew members had endured months without work due to the strikes, and years of development had gone into bringing the Film to life. Moreover, Baldoni and Heath shared a conviction that "It Ends With Us" could still provide a powerful opportunity to center the voices and stories of domestic abuse survivors.

131. It is crucial to note that the list of "grievances" read at the January 4, 2024 ambush were new, separate and apart from the 17-point Return to Production Demands, and were never presented to any of the parties present. Though Lively's CRD Complaint misleadingly suggests the parties agreed to a list of 30 items, many of the items listed on the CRD Complaint were new, entirely based in lies, and neither read nor provided to any of the parties, let alone agreed to. The *only* document presented to the parties was the 17-point Return to Production Demands presented on November 9, 2023, and signed over 2 weeks *after* this "meeting," on January 19, 2024. Lively's CRD Complaint, which on information and belief she disseminated to the *New York Times* well in advance of any legal filing, is riddled with blatant and deliberate misrepresentations, as is her Complaint here.



132. As Lively admits, filming resumed the following day and then concluded without any further grievances or references to previous disputes by Lively:

“[T]he parties agreed to implement and follow the Protections for Return to Production to ensure that the Film could be completed, marketed, and released safely and successfully. **And it was.** Production of the Film resumed on January 5, and concluded on February 9, 2024. The Film has been a resounding success.<sup>21</sup>”

133. Now that Lively had unleashed Reynolds on Baldoni and Wayfarer, they felt powerless to oppose the couple. Just as Lively had warned in April 2023, nine months before, Reynolds would ensure that Lively’s demands were met at every turn. From then on, Lively would get her way—or else. Unmistakably, Lively would use her carefully constructed paper trail to destroy Wayfarer, Heath, Baldoni—and the Film.

#### **F. Lively Completes Her Usurpation of the Film**

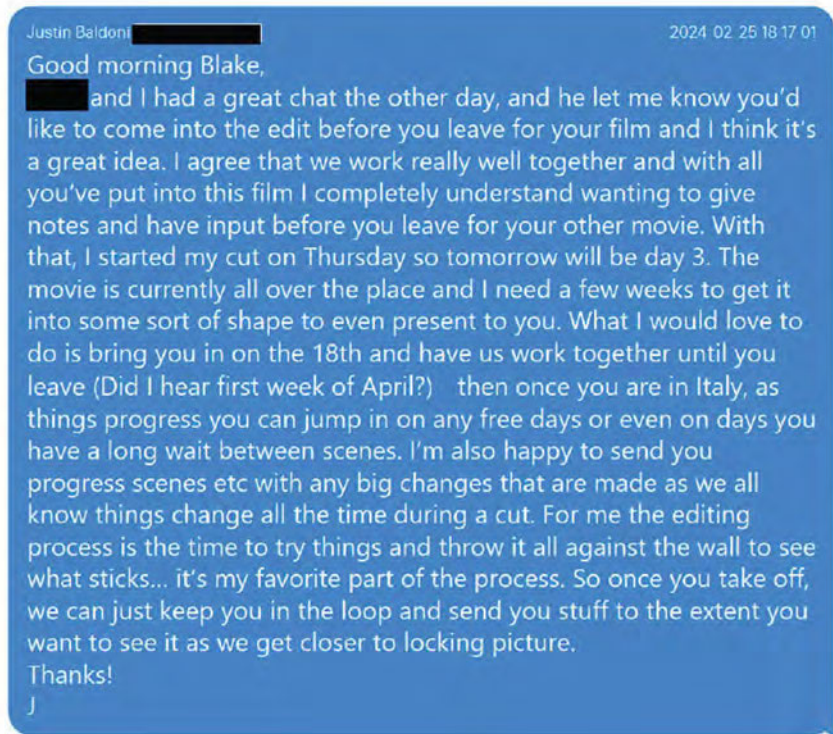
134. The Directors’ Guild of America (“DGA”) requires a ten-week editing period for directors to privately edit and assemble their director’s cut. This period is sacrosanct as it gives the director uninterrupted time to creatively shape the final product—a time to experiment, take risks, and refine until the Film fully reflects their artistic vision. For Baldoni, this period is the peak experience of the filmmaking process: a time to immerse himself in the creative craft, free from external influences. But Lively denied Baldoni this experience on this powerful and deeply felt film.

135. Lively requested, through producer Todd Black, to join Baldoni in the editing bay. As a seasoned professional with over twenty years of experience in film and television—not to mention growing up in a family deeply involved in the industry—Lively knew full well the implications of her request. But in the aftermath of the serious, and false, allegations that she had leveled against Baldoni, Heath, Wayfarer, and the production, and with pressure from Sony, they

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<sup>21</sup> See CRD Complaint ¶ 5.

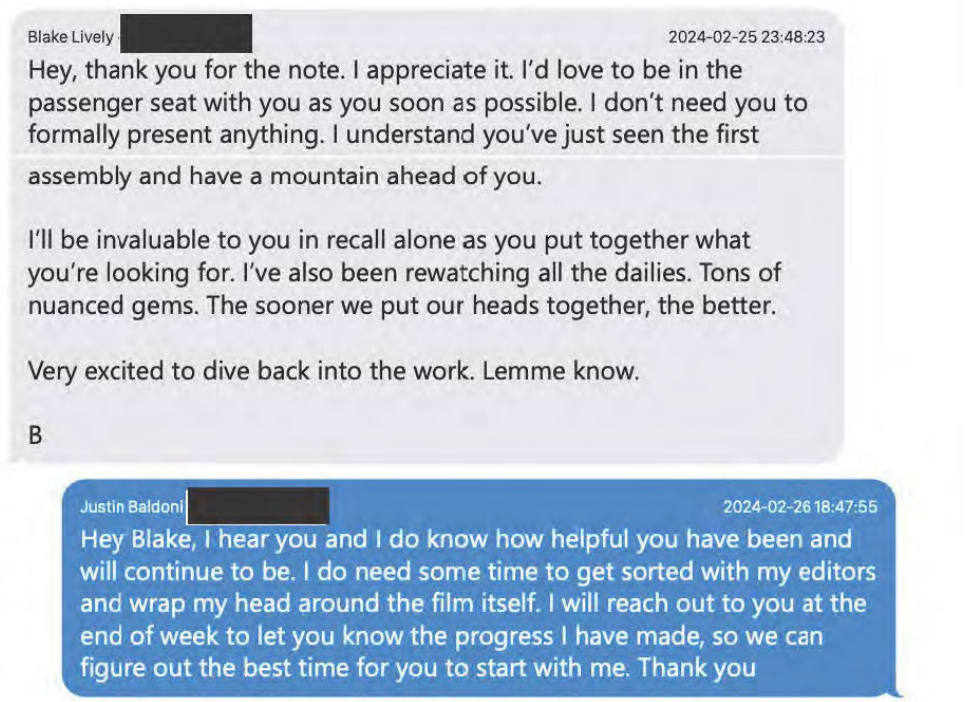
reluctantly agreed to grant her access to the editing bay for two days. Notably, despite her allegations that Baldoni made her “uncomfortable,” Lively insisted on working closely with him through this process.



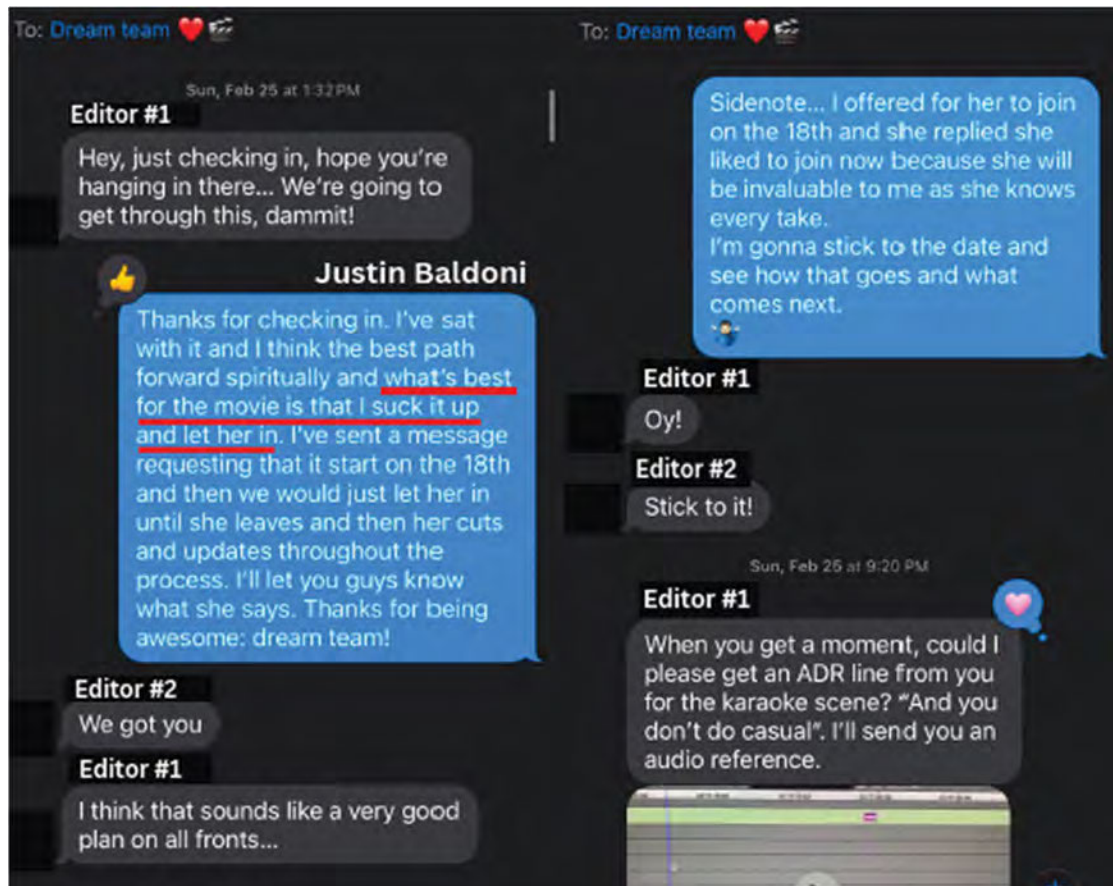
Justin Baldoni [REDACTED] 2024 02 25 18 17 01

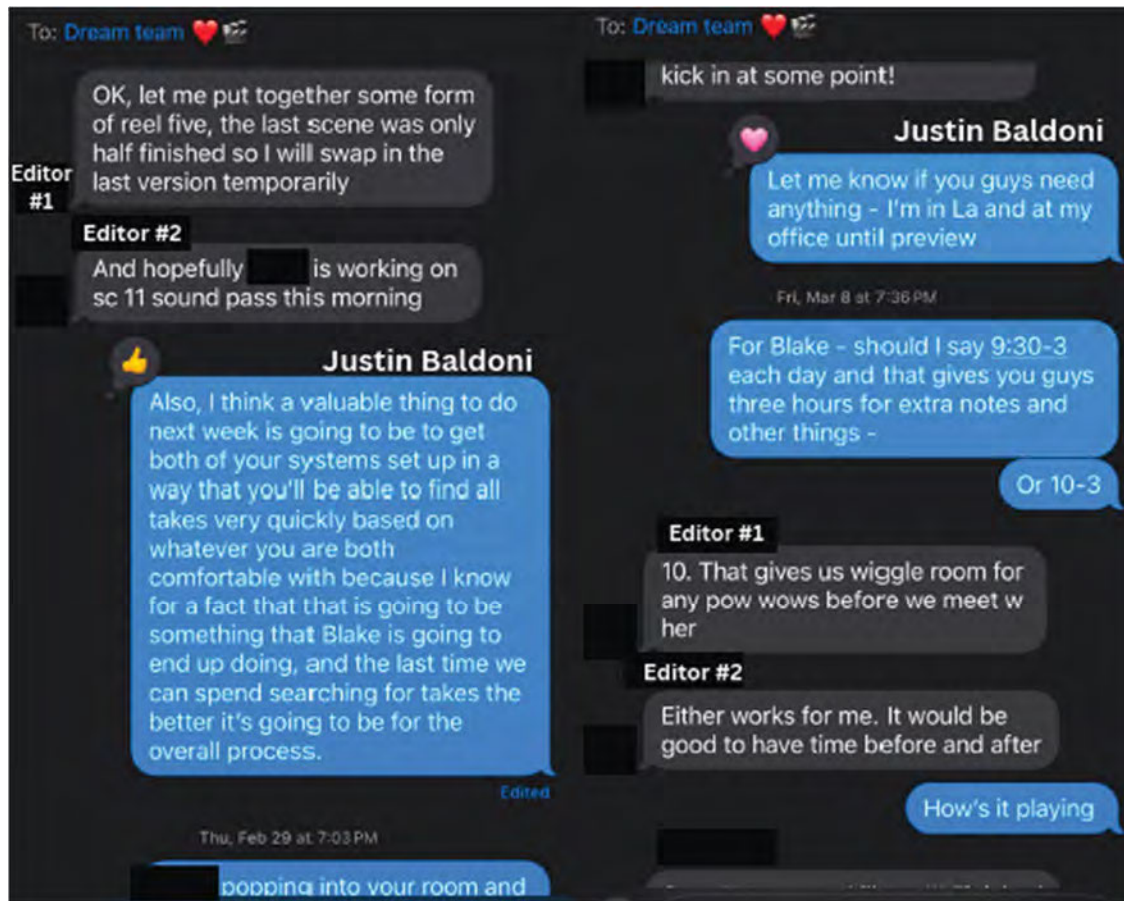
Good morning Blake,  
[REDACTED] and I had a great chat the other day, and he let me know you'd like to come into the edit before you leave for your film and I think it's a great idea. I agree that we work really well together and with all you've put into this film I completely understand wanting to give notes and have input before you leave for your other movie. With that, I started my cut on Thursday so tomorrow will be day 3. The movie is currently all over the place and I need a few weeks to get it into some sort of shape to even present to you. What I would love to do is bring you in on the 18th and have us work together until you leave (Did I hear first week of April?) then once you are in Italy, as things progress you can jump in on any free days or even on days you have a long wait between scenes. I'm also happy to send you progress scenes etc with any big changes that are made as we all know things change all the time during a cut. For me the editing process is the time to try things and throw it all against the wall to see what sticks... it's my favorite part of the process. So once you take off, we can just keep you in the loop and send you stuff to the extent you want to see it as we get closer to locking picture.

Thanks!  
J



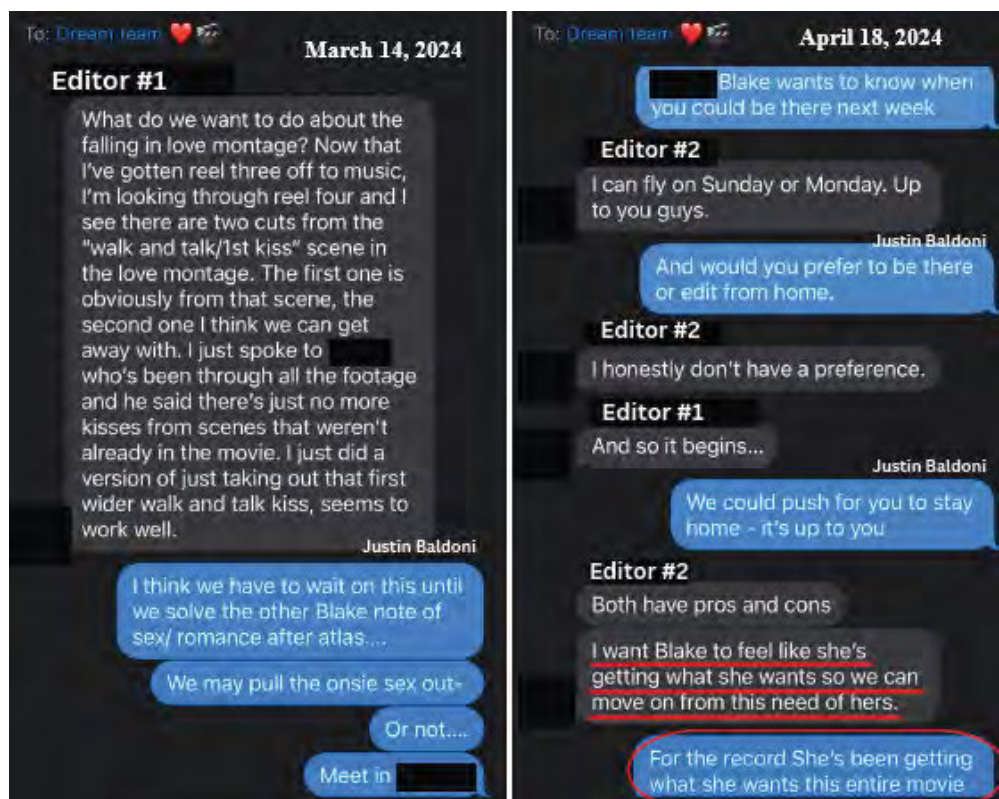
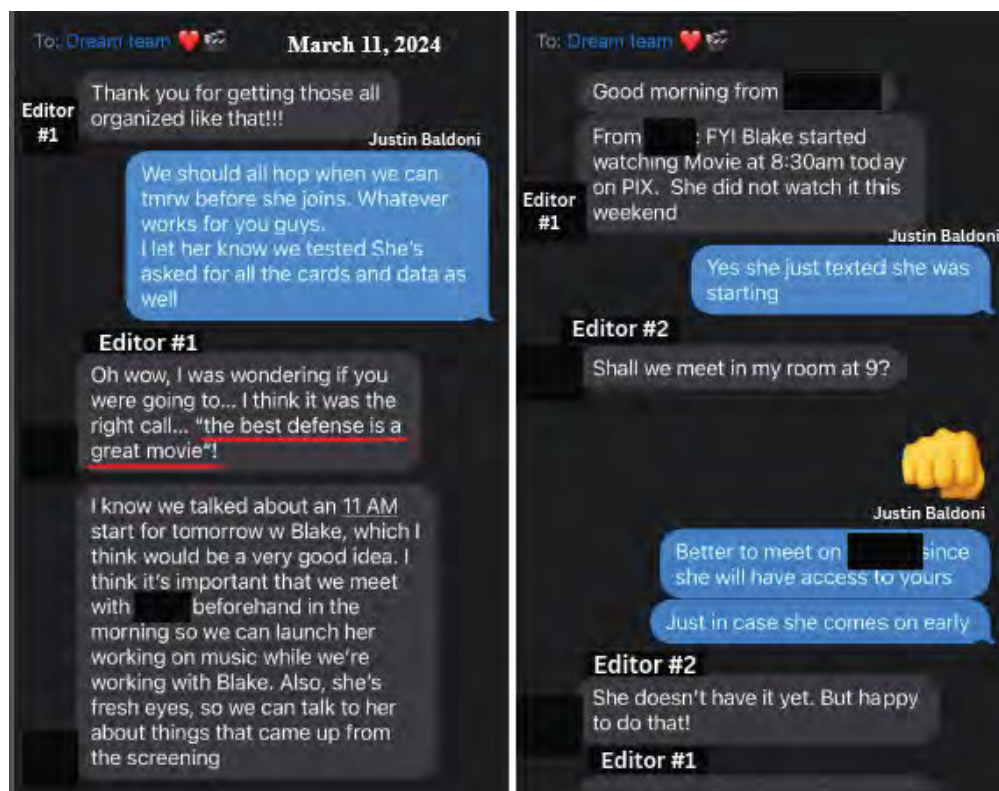
136. In February and March 2024, Baldoni acceded to the request that Lively be “let in” to the editing process:



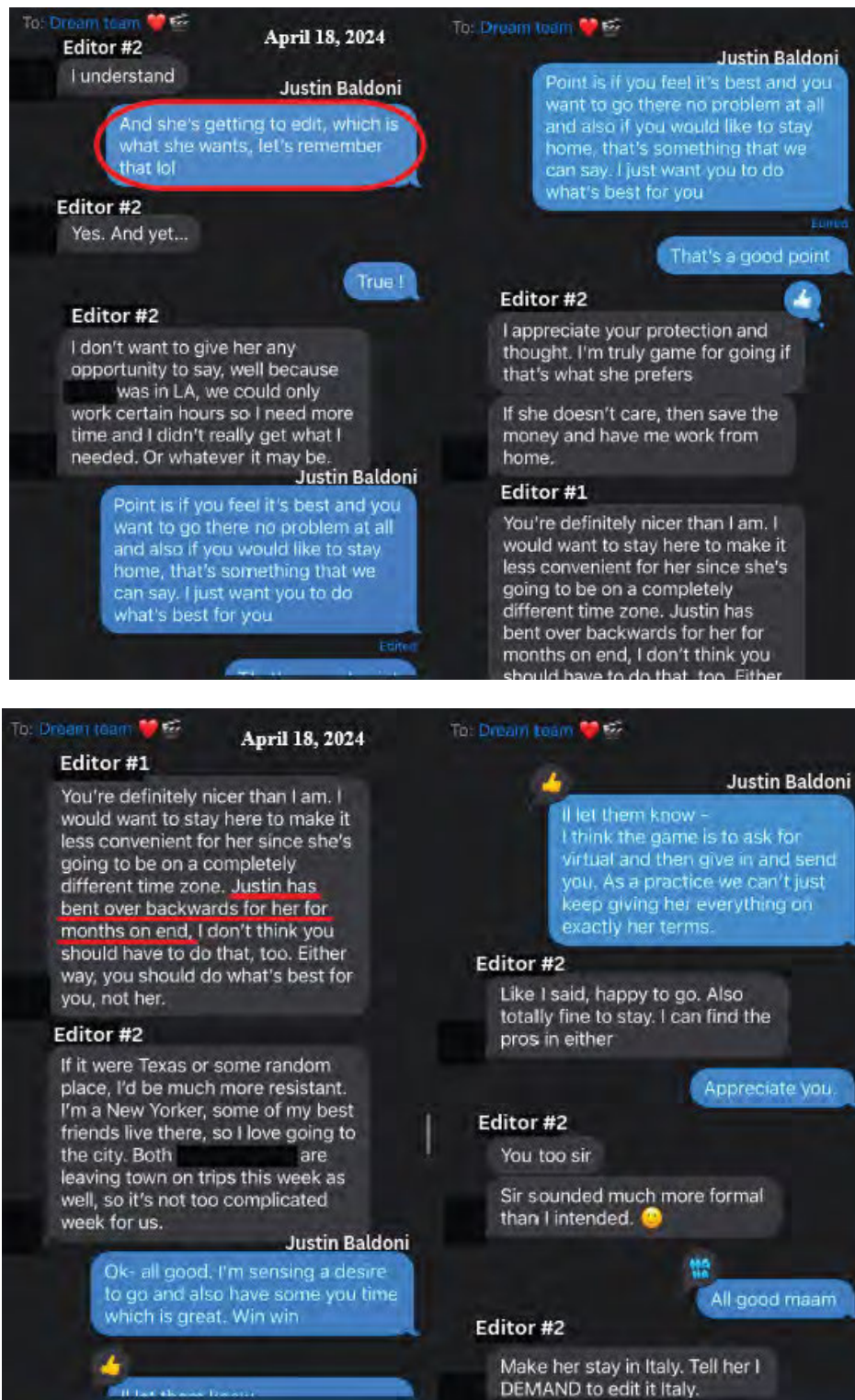


137. Later in March 2024, Lively continued pushing for her demands, as what had been a two-day collaboration extended into ten, and Lively sought to work alone in the editing bay, without Baldoni, so that she would have full control. Though Baldoni incorporated seven pages of her notes into his edit at the very start, and consistently kept her involved in every subsequent edit (despite having absolutely no obligation to do so), Lively was not satisfied with merely collaborating with the director. She wanted to *be* the director, and see her *own* creative vision for the Film realized.



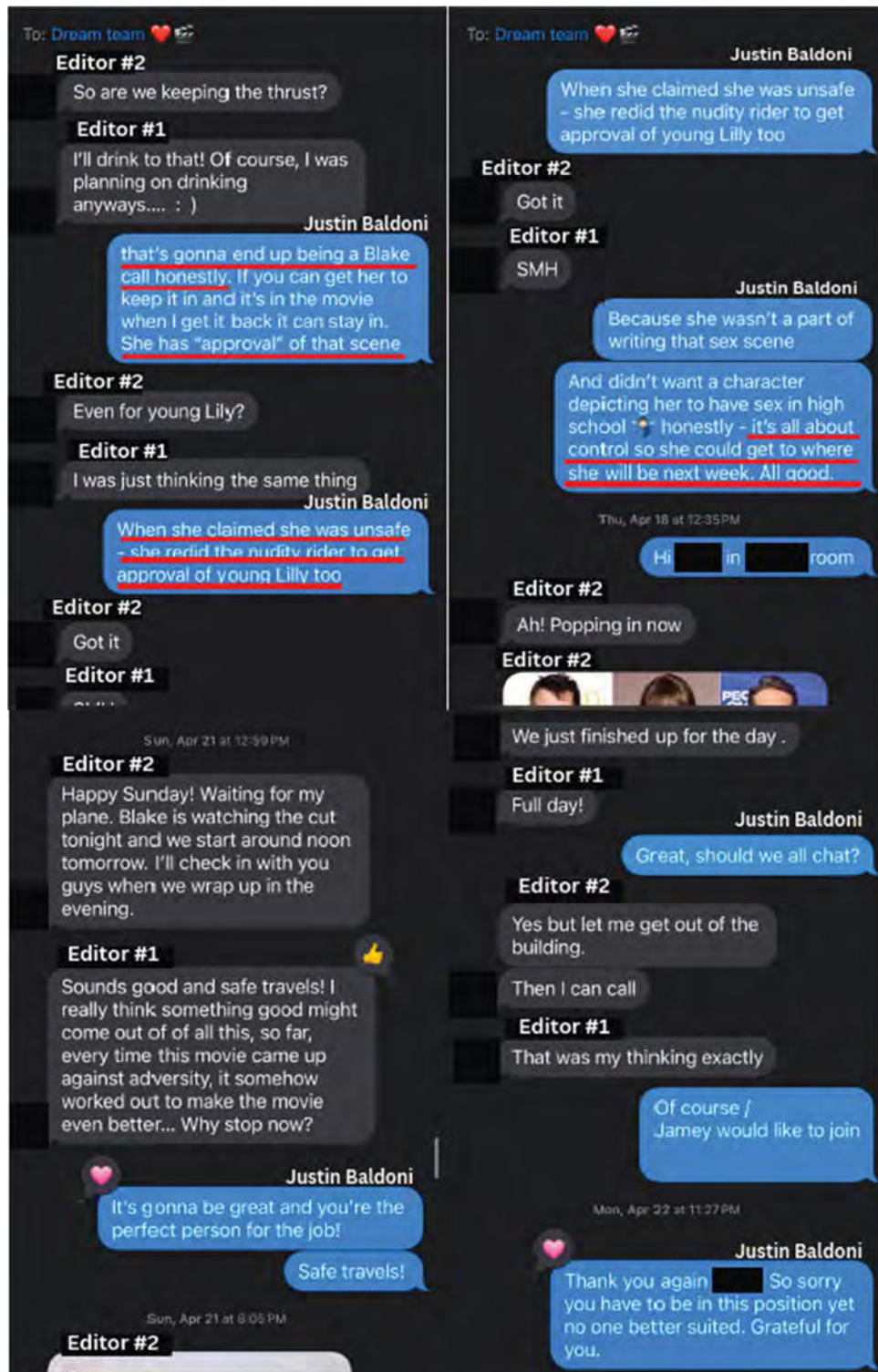


138. As the editors noted, Baldoni “bent over backwards for [Lively] for months on end”:

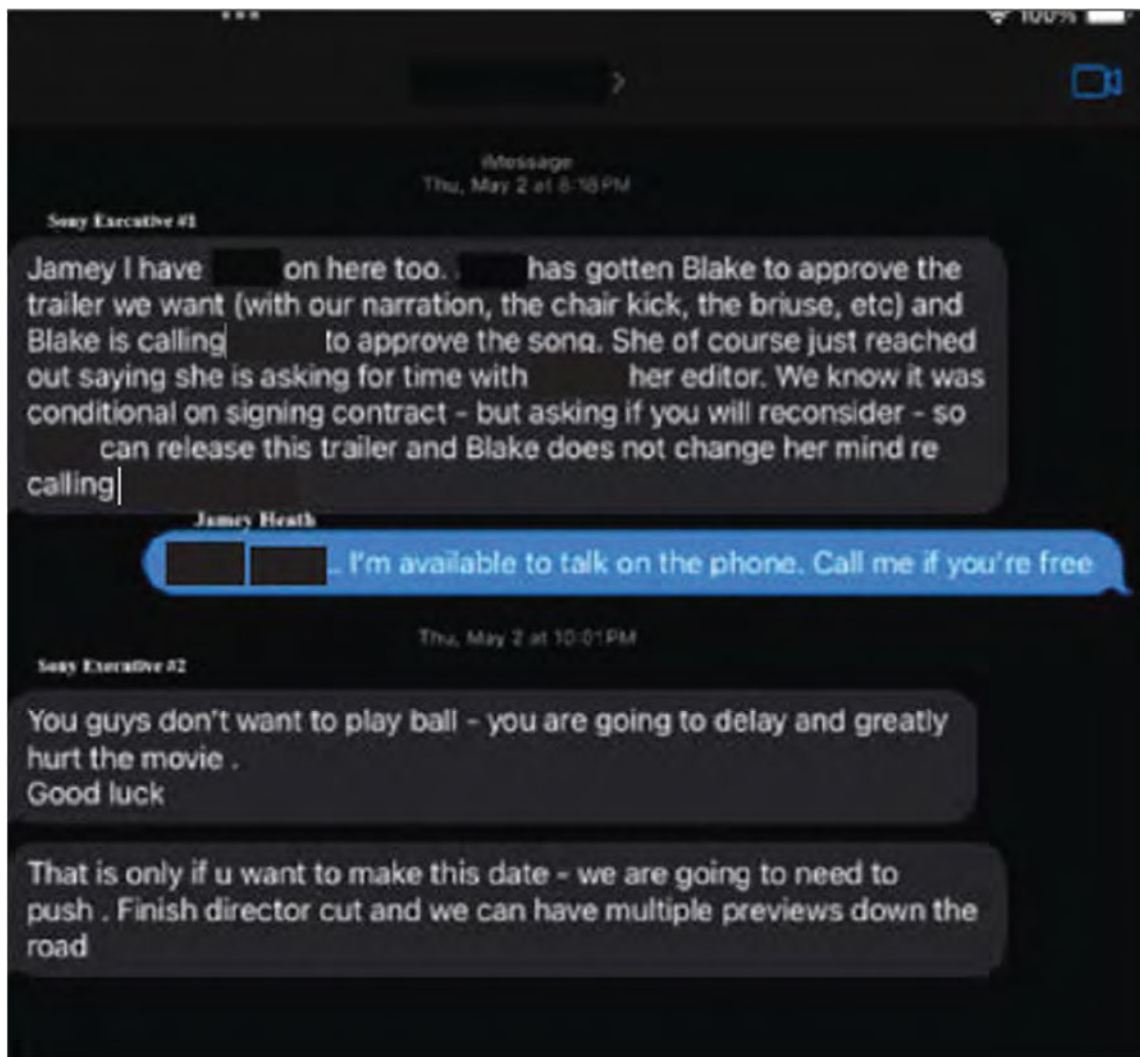




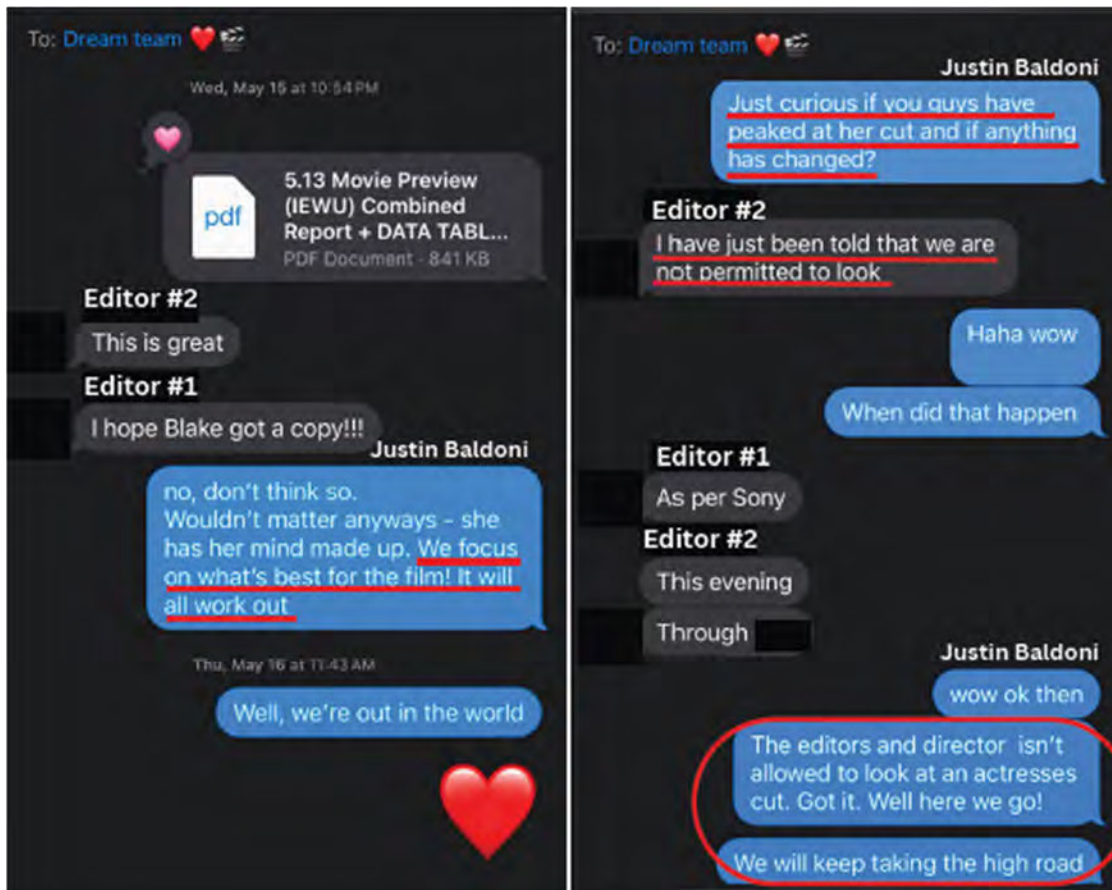
139. As April 2024 approached, Lively gained approval rights over individual scenes:



140. Finally, in April and May 2024, Lively's extortionate threats coerced Sony to allow her to create *her own cut* of the Film (a right that is *exclusively* reserved for directors) at Wayfarer and Sony's expense, and despite Baldoni and Wayfarer's rightful protests. Sony's reasons for acquiescing to these beyond-unreasonable demands were clear. Sony told Wayfarer in no uncertain terms that Lively refused to promote the Film unless her demands were met. Wayfarer, feeling increasingly cornered into agreeing to Lively's demands, attempted at least to require that Lively finally sign her engagement contract if her demands were to be met. Even this basic ask was refused, and Sony urged Wayfarer to give in.



141. Baldoni and the Film's original editors were not even allowed to *see* Lively's cut, even if just to see how much of their work had been replaced.



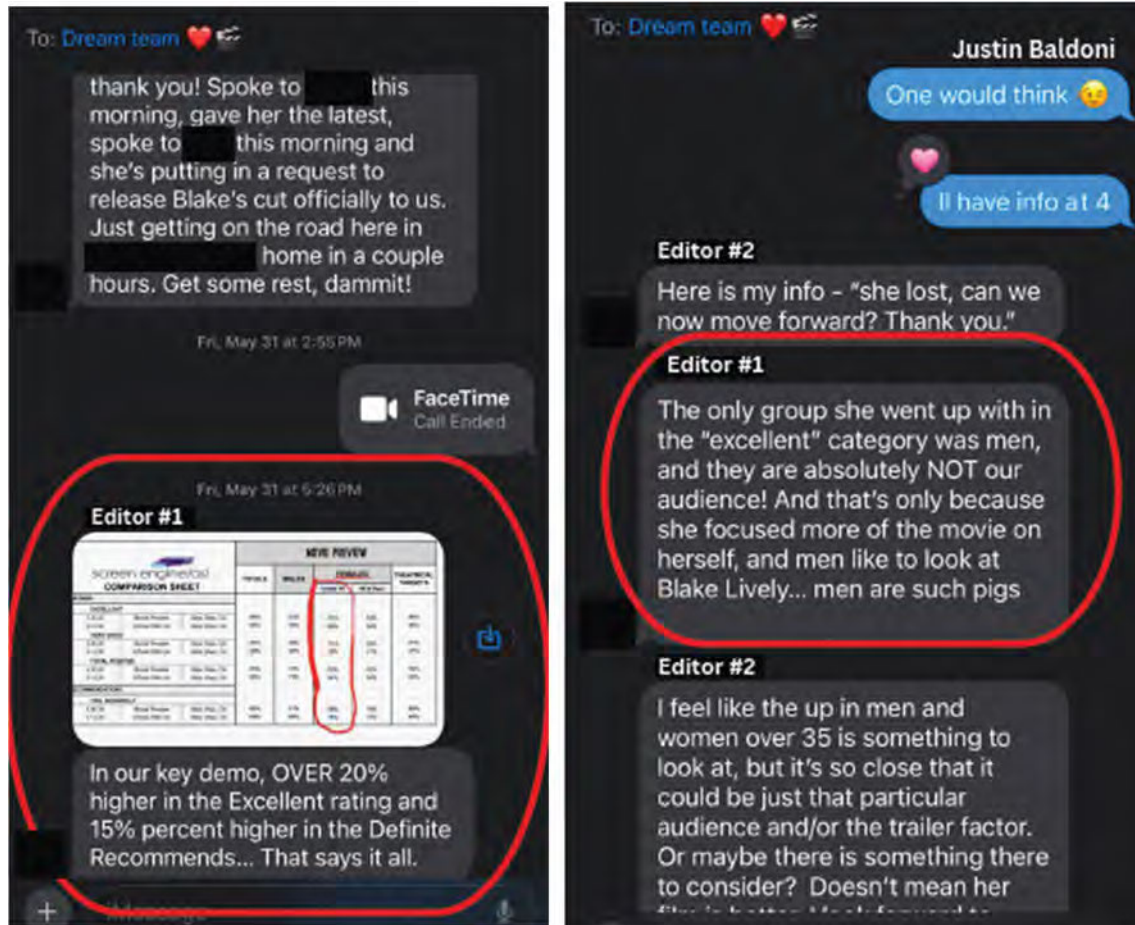
142. Still believing that in a sane and just world, despite Lively's continued extortion, an actress would never be allowed to usurp his legal right as a director to create and release his cut of the Film, he assumed that Lively's edits would simply supplement his work. Thus, Baldoni continued refining his director's cut. But as Lively threatened to refuse to promote the Film or approve any related marketing materials (such as trailers, posters, and social media posts), a doomsday scenario for this major motion picture, Wayfarer and Baldoni were extorted into acquiescence to more and more demands. This included co-funding (together with Sony) a "friends and family" screening of her version of the Film (which they had not approved *or even seen*), entirely at Lively's insistence.

143. Ultimately, Lively replaced the Film's editors with her own choice: an editor often used by Reynolds, and the Film's editors had to be let go. She also replaced the Film's award-winning composer with composers from Reynolds' recent project – even though the Film's composer had already finished the score, with an orchestra (which is costly). Sony supported Lively's demands and even enforced her dictate that the Film's director and editors not be permitted even to *view* "her cut."

144. Wayfarer and Sony found themselves in the unprecedented and uncomfortable predicament of having two competing versions of the Film: one made by the Film's actual director, and one made by a person with no contractual or creative right to even approach the editing bay, let alone make her own cut. But in light of Lively's threat to withhold promotion of the Film, as well as her thinly veiled threat to end Baldoni's career with a slew of false accusations, the studio reluctantly agreed to do an official audience test of both versions (again at Wayfarer and Sony's expense). This decision was made on the understanding that Lively had agreed with Sony that, if Baldoni's director's cut tested higher, she would drop the matter and fully cooperate so that Baldoni could finish the Film without further interference.

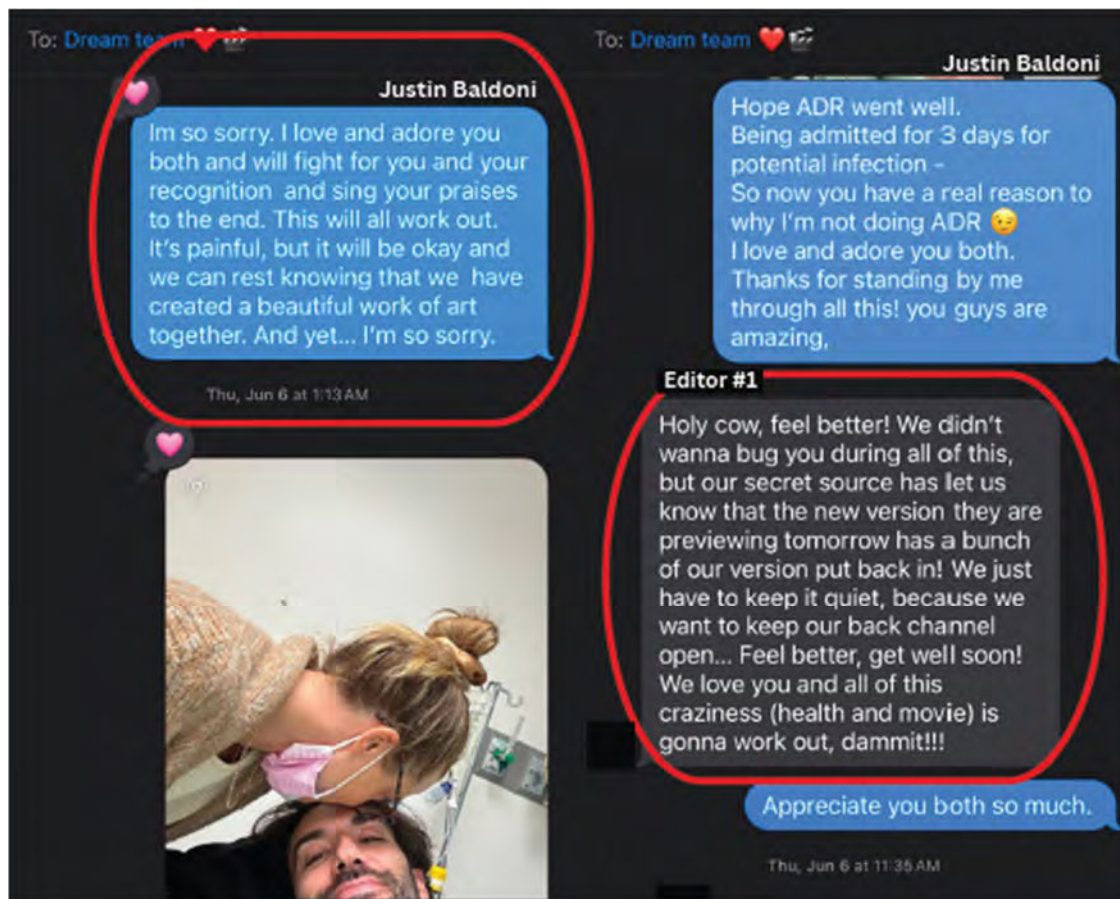
145. Tellingly, in a side-by-side comparison of audience tests, Baldoni's cut scored significantly higher with key audience demographics:



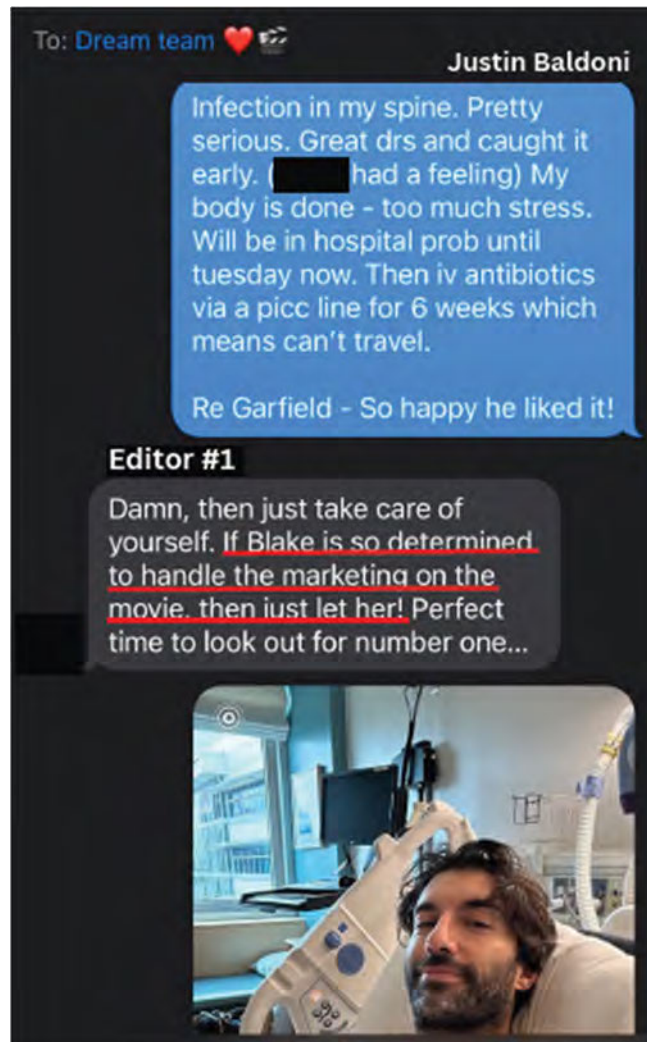


146. Not surprisingly, Lively reneged on her promise and insisted that her version be released to the public instead of Baldoni's cut as director, even claiming that the book's author, Colleen Hoover, would refuse to promote the Film as well if Lively's version was not chosen. Sony called to tell Wayfarer that neither Lively nor any of the cast would promote the film unless Lively's cut were used. Baldoni was forced to choose between killing the film and his own career by insisting on his own creative vision and rights, or putting out a version of the Film that Baldoni knew could still be so important to domestic violence survivors, even if it differed greatly from what it could have been. Baldoni reluctantly chose the latter, and stood down, allowing Lively's version of the Film to be released and promoted. Baldoni was essentially forced to fire himself as director and allow Lively to finish his film, knowing it was the only choice he could make to serve

the greater good. Two days later, Baldoni was hospitalized with a serious spine infection. Eventually, with the key demographic being the focus, Sony and Screen Engine (the audience testing company), convinced Lively to put back as much of Baldoni's edit as they possibly could. None of this was officially communicated to Baldoni, but whispers reached him that part of his cut made it back into the final release. Baldoni made sure to thank and apologize to his editors, whom Lively had caused to be let go.



147. By June 2024, Lively was dictating much of the marketing for the Film she had stolen from Baldoni and Wayfarer:



148. Lively shamelessly removed Baldoni (the Film's co-star, director, and executive producer who had championed this Film for 5 years and whose company had co-funded the entire project), out of all posters, trailers, and other promotional materials. She continued to refuse to promote the Film otherwise.



WAYFARER

FOR APPROVAL: IEWU | Domestic print for approval

To: Jamey Heatin

Cc:

Tue, Jun 18, 2024 at 7:47 AM

Hey Jamey,

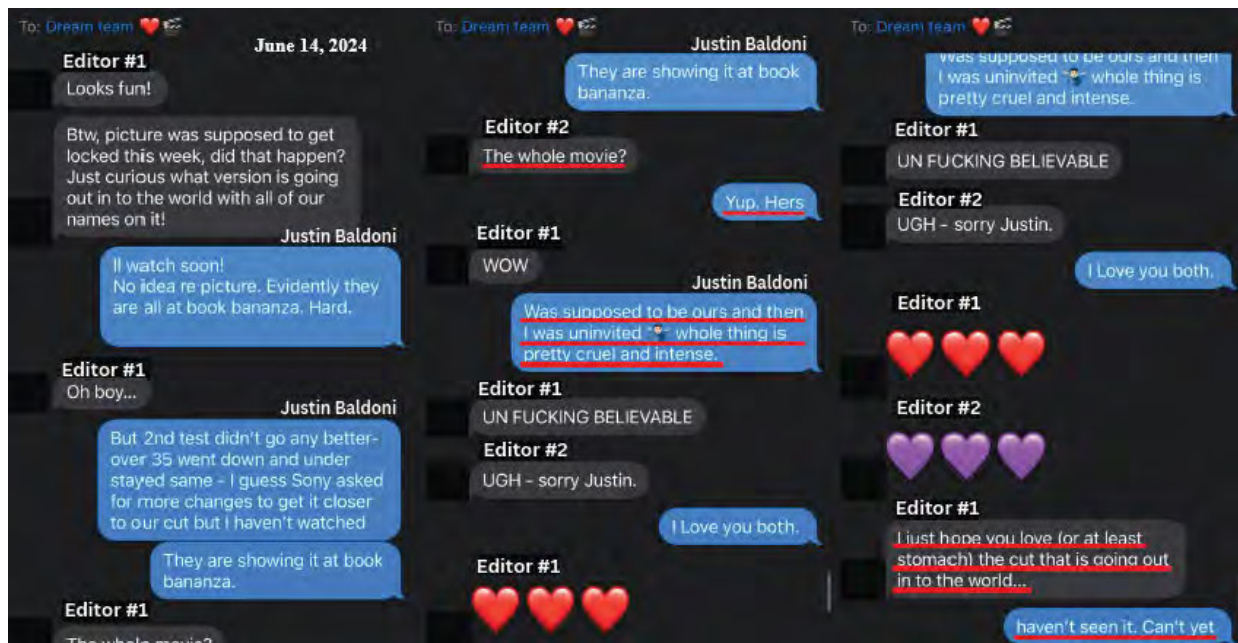
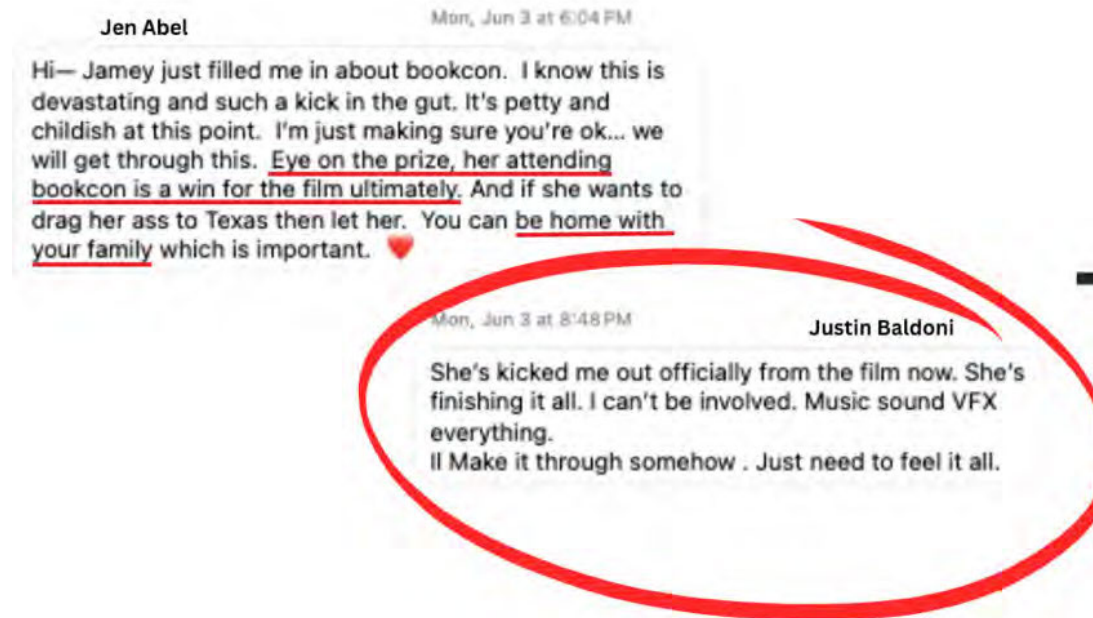
We had a very successful weekend at Book Bonanza, and the fans loved the book art displayed at the event. We would like to release this art as our second teaser poster for domestic distribution. Since it has already been released internationally in many markets, it only makes sense to use it domestically as well. We'd love to start printing tomorrow to get it into theaters. However, this version does not have Justin Baldoni's "a film by" credit, so we would need to waive that. Please let me know if this is approved.

Best,

Sony Executive #3

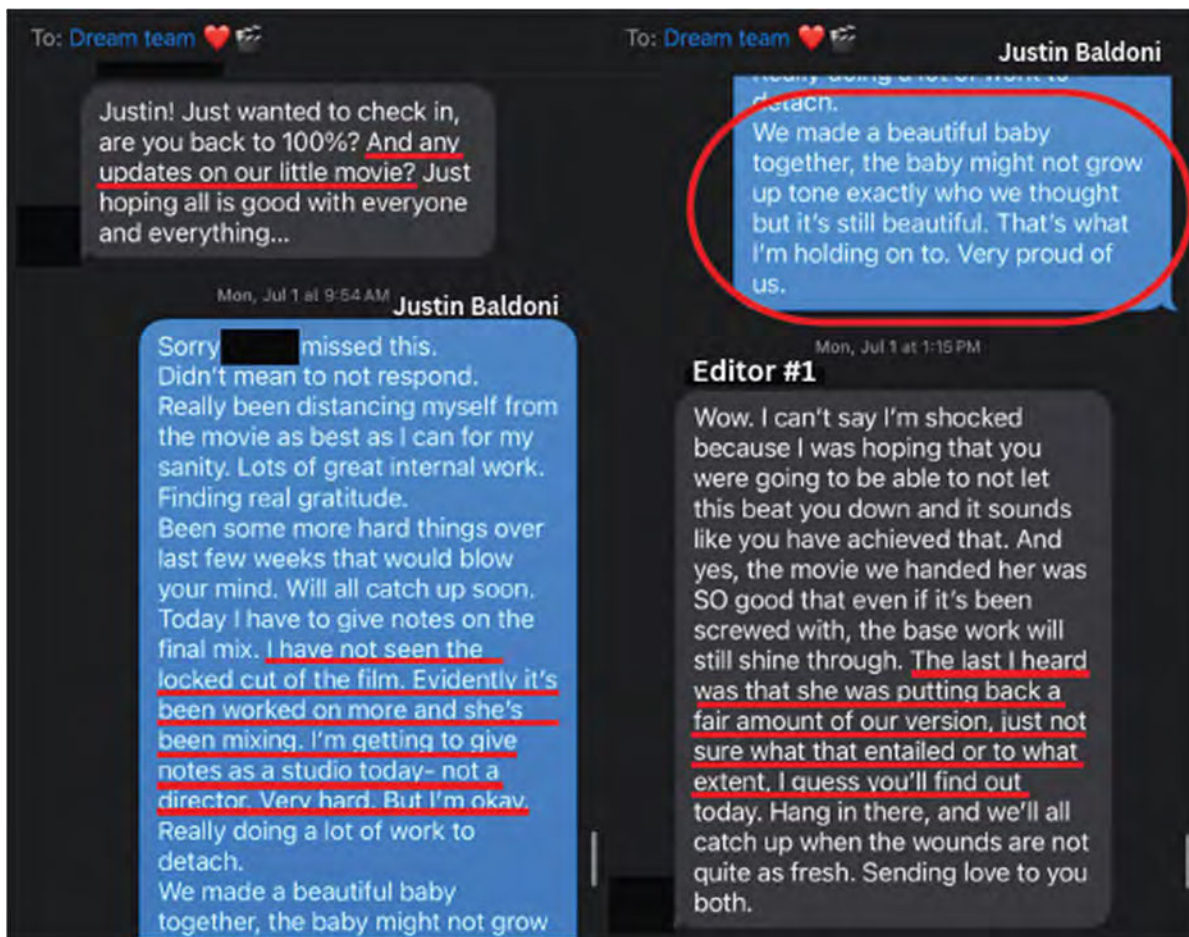


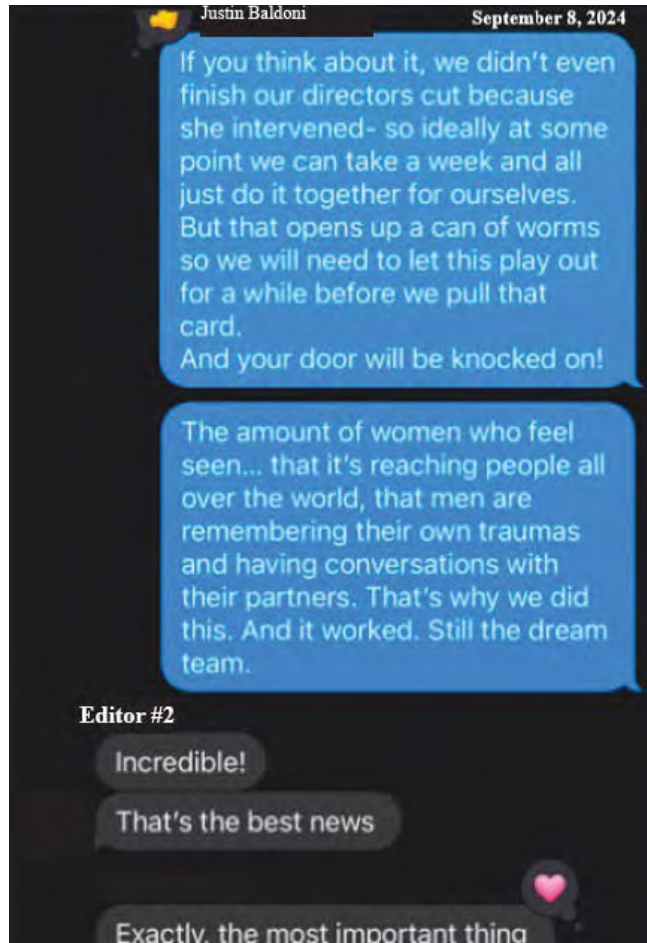
149. Over Sony's objection, Lively insisted on screening her cut at Book Bonanza, Colleen Hoover's annual convention hosting authors and fans from around the world, an event that Baldoni had long been excited to attend. But Sony made it known to Wayfarer that, per Lively, Baldoni could not attend, notwithstanding the obvious promotional and PR risks. Lively appeared on a panel alongside Hoover and other cast members, icing out Baldoni from this critical event for his own film. He was not even allowed to review the final cut *before it was shown to the world*.



150. By July 2024, Baldoni was completely locked out of the Film's final cut. By virtue of his role at Wayfarer, he was permitted to "give notes as a studio." This only added insult to injury because he should not have been "giving notes"—he should have been *editing the Film*.

151. Despite his personal feelings, he redirected his thoughts to focus on the one positive: The Film, years in the making, was very close to being seen by the world, even if it was no longer his film. He prayed for the possibility that the Film could still make the impact he intended when he first reached out to Colleen Hoover in 2019.





152. Lively was still not satisfied. She *continued* to extort Wayfarer, Baldoni, and even Sony, threatening to abandon her contractual obligation to promote the Film or approve marketing materials if she wasn't awarded a producer credit, and though Wayfarer had refused long ago to accede to this request when it was made during initial negotiations, Wayfarer now had its back against the wall and again, had to concede.

153. This *still* wasn't enough. Lively later sought the coveted *p.g.a.* mark on her producer credit—a certified designation licensed by the Producers Guild of America (“PGA”) to identify producers who have performed the majority of the producing work on a motion picture. Neither Baldoni nor Wayfarer believed Lively fulfilled the requisite criteria to earn this mark, but that did not matter to Lively.



154. Lively demanded, again with extortionate threats, that Baldoni, Heath, and other producers and department heads send letters to the PGA in support of her certification for the *p.g.a.* mark. Despite unanimous recognition of the absurdity and the unmistakably extortionate threats, Sony and other parties, despite being adamant not to support Lively's demand for the unentitled mark, ultimately acquiesced and submitted letters of support.

155. However, Wayfarer and Baldoni firmly resisted. Because Lively did not perform the duties of a producer and therefore did not merit the *p.g.a.* mark—a distinction highly valued and taken seriously within the industry—Wayfarer and Baldoni refused to devalue the contributions of actual producers, on the Film and elsewhere, who merited the mark, and were unwilling to misrepresent Lively's contributions to the Film. Having been forced in the face of extortionate threats to concede to Lively's every demand to thus far, they believed it would be dishonest, unethical, and unjust to producers who rightfully earned the mark, to falsely represent to the PGA that Lively had fulfilled the requisite producing responsibilities. Asking that they lie on her behalf was the final straw...or so they thought.

156. In response, Lively instructed Sony to tell Wayfarer and Baldoni that “*any good will left between us is done.*”

157. Eventually, in the face of persistent threats and extortion, Wayfarer and Baldoni were left with little choice but to draft and sign a letter of support on Lively's behalf, but not before Heath sent an email to Wayfarer's attorneys documenting that he and Baldoni were signing the letter under duress.

## Private and Confidential. PGA Letter

External

Block A



Jamey Heath

to

Thu, Jun 27, 2:55PM



Reply to all



Hi Everyone,

I'm writing to you all regarding a letter that I wrote on behalf of Justin and myself addressed to the Producers Guild.

As you know, we received a request to write a recommendation on behalf of Blake for her to receive the PGA mark.

This was a request that we feel was unreasonable and cold hearted. Essentially, the movie IEWU has been taken unjustly from Justin as a director and essentially from Wayfarer's control due to the extortion of Blake.

Without going into all the details of the events that have transpired over the months, Justin and I ended up agreeing to write the letter due to feeling trapped. She continues to hold a threat over our heads and every time we try and hold a line she uses that threat either directly or indirectly to get us to fold. Make no mistake, I am not suggesting that we were literally forced to acquiesce, but given the high profile of the movie, the partnership with Sony, the amount of money invested and the need to complete the movie, we have written the letter on her behalf, omitting the truth of how and why she was able to contribute in the ways we listed.

There is nothing to do with this letter now. It only serves as a way to memorialize why the letter was sent in the first place should we ever need to explain it.

Thank you!

Jamey



Jamey Heath  
CEO  
Wayfarer Studios





June 26, 2024

Dear members of the Producers Guild of America,

We hope this letter finds you well. We are writing to inform you of the significant role and contributions that Blake Lively has played in the making of the film, *IT ENDS WITH US*, based on the best-selling novel by Colleen Hoover.

This film has meant a great deal both personally and to our company, Wayfarer Studios, as we optioned the property nearly five years ago. As such, we've been directly involved in overseeing every step of development from adapting the book to the big screen, to bringing on our co-financier/distributor, Sony, and of course, casting our lead.

From the time Blake was brought on, she has had an instrumental voice in many different aspects in the making of the film. Her contributions have been impactful as she was consulted with many of the casting options, she helped to refine the script, she redesigned her own wardrobe as well as gave notes on others, she contributed to the production design and set decoration, and had influence on how many of the scenes were shot.

Blake has been very involved in the post process as well. She has had an active role in the edit, the sound mix and has made decisions on the music selections and score. She also continues to find creative ways to promote the film so that it can achieve its greatest success.



Since contractually she began the movie with an EP credit, our earlier submission to the PGA did not include her as a named Producer, but we both feel her contributions have warranted the revised credit and consideration for the PGA mark.

On behalf of Wayfarer Studios,

Justin Baldoni -  
Director *IT ENDS WITH US*

Jamey Heath  
Producer p.g.a *IT ENDS WITH US*



  
**Jamey Heath**  
CEO  
Wayfarer Studios  




158. As the premiere of the Film approached, Lively made good on her promise and instructed Sony that she and the cast would not participate in any marketing or promotion of the Film alongside Baldoni, in spite of Baldoni and Wayfarer's acquiescence to all her demands. She made certain that Baldoni was removed from all artwork for the Film (posters included) and stripped him of his "A Film By" credit. Lively and Reynolds also unfollowed him on social media, as did the author of the book—someone with whom Baldoni had maintained a five-year personal relationship, and for whom Baldoni created this opportunity.

159. The other cast members also unfollowed Baldoni, creating the false impression that Baldoni had done something wrong. On information and belief, Lively induced the other cast members to shun Baldoni, in an early attempt to give fans the impression that Baldoni had committed an egregious sin, something so egregious that no one wanted to even take photos with him or have him around. Lively was leaving what she had earlier referred to as "crumbs," a social media strategy she had learned from a close celebrity friend: to give fans *just enough* to allow them to come to their own conclusions, thereby launching an army of detectives that, on information and belief, Lively hoped would turn against Baldoni. The unfollowing of Baldoni by cast members and even the author of the book, who he had a longstanding relationship with, was done without warning or any communication from them, in stark contrast to the warm praise and appreciation cast members had until that point always showered on him. For example, Isabela Ferrer, cast as "Young Lily," exchanged grateful texts with Baldoni during and after her filming stint, which included a number of scenes involving intimacy:

Justin Baldoni [REDACTED] 2023-05-04 01:01:33  
You did awesome today! So happy to be working with you.

Isabela Ferrer [REDACTED] 2023-05-04 01:02:26  
Thank you so much!!! I'm so excited. Thank you for being a great director and being so wonderful to work with already. Let me know whenever you need me for anything ! :)

Justin Baldoni [REDACTED] 2023-05-04 01:07:46  
So kind More to come! You are gonna kill it

Isabela Ferrer [REDACTED] 2023-05-04 01:08:45  
Loved "So kind More to come! You are gonna kill it "

Isabela Ferrer [REDACTED] 2023-07-11 20:01:20  
Hey!! Just got my film developed from when we were shooting so here's this sweet pic!  
I also have to say thank you SO so much for an incredible experience on my first film.  
I still cant shake the feeling of it all because it truly was life changing for me,  
you are such a wonderful, smart and sincere director and you created such a comfortable, safe space for me to feel like I could fully step into this role. I couldn't have asked for a more welcoming environment.  
It will stay with me for the rest of my life!!  
See you soon, whether in the fall or later, & Hope you're doing well :)  
x

Attached URI: [REDACTED]



Attachment IMG\_8995 Thumb.jpg C80004234 Attach Thumb.jpg

Justin Baldoni [REDACTED] 2023-07-12 13:33:25  
Isabela!!! Wow what a kind message

Justin Baldoni [REDACTED] 2023-07-12 13:34:49  
You were such a joy and pleasure to work with. Your openness, your raw talent, your kindness and your excitement made me fall in love with directing again. I'm so excited for your career and for everyone to see you in this film. You have a big career in front of you!! Looking forward to seeing you again in September even if we don't need you to work ... come visit!

160. Tellingly, Ferrer worked with Baldoni when Lively was *not* on the set; it was not until Ferrer spent substantial time with Lively during film promotions that Ferrer felt compelled to shun Baldoni in repudiation of her warm words.

161. It became clear that Lively was laying the groundwork to explain away her theft of the Film and exile of Baldoni. Presumably, she was concerned that her shocking conduct would be frowned upon if it became widely known. Baldoni had no intention of ever making this information public. In fact, as co-star of the film, both he and *his studio, who co-financed the Film* and had spent millions of dollars, had every reason to want the Film to succeed; any suggestion otherwise is illogical. Baldoni promoted the Film as originally intended, gave Lively full credit and praise, and had done everything in his power, at every painful turn of making this Film with Lively, to ensure the Film succeeded. He wanted to move on. Lively, however, would not let it go.

162. Baldoni later received word that, during the premiere of his movie *Deadpool & Wolverine*, Reynolds approached Baldoni's agency, namely, an executive at WME, and expressed his deep disdain for Baldoni, suggesting the agency was working with a "sexual predator" (a phrase that uncoincidentally later appeared in the press) and, at a later date, demanded that the agent "drop" Baldoni. His wielding of power and influence became undeniable. Baldoni and Wayfarer grew increasingly fearful of what Lively and Reynolds were capable of, as their actions seemed aimed at destroying Baldoni's career and personal life. This pivotal moment terrified Baldoni and ultimately caused him to seek help anywhere he could to protect his reputation, his partners, and his wife, children, and family from false accusations that could ruin their lives. Desperate, terrified, and in this position for the first time, he sought expert guidance and was advised to engage "crisis PR" to *be ready* in case Reynolds and Lively decided to unleash their wrath on them. *As is customary*, a proposal was prepared for him with available measures and quotes of what each

suggested measure would cost. This *proposal*, wrongfully obtained from the very public relations company that once represented Baldoni (with whom he had recently severed ties), was later used by Lively to knowingly and falsely assert that Baldoni had agreed to the most aggressive option in the proposal. Lively falsely (and ironically) alleges Baldoni set out on a “smear campaign” to destroy Lively despite the thousands of documents she alleges to have that would prove otherwise. Notwithstanding, Lively, her team, and the *Times* worked in concert to cherry-pick, deliberately misconstrue, splice, and alter private communications to manufacture a self-serving and factually baseless narrative.

23. On August 16, Ms. Nathan circulated a Daily Mail article entitled “String of ‘hard to watch’ videos that have surfaced following ‘tone deaf’ Q&A to promote *It Ends With Us* could tarnish 36-year-old star’s golden Hollywood image for good,” to which Ms. Abel responded: “Wow. *You really outdid yourself with this piece*,” and Ms. Nathan replied: “*That’s why you hired me right? I’m the best.*”

**Is Blake Lively set to be CANCELLED? String of ‘hard to watch’ videos that have surfaced following ‘tone deaf’ Q&A to promote *It Ends With Us* could tarnish 36-year-old star’s golden Hollywood image for good**

• Another encounter between Lively, who shares four children with Ryan Reynolds, and journalists to create plans involving shared access to social media  
• READ MORE: Justin Baldoni addresses ‘*It Ends With Us*’ assault of *It Ends With Us*

By ELIZABETH COLEMAN, 16 August 2024, 12:46 PM (UTC+0)

151 729

From: Melissa Nathan (sender: Abel) (primary)  
To: Jennifer Abel (primary)  
Subject: Wow  
Priority: Normal  
16/08/2024 12:46 (UTC+0)

From: Jennifer Abel (primary)  
To: Melissa Nathan  
Subject: You really outdid yourself with this piece  
Priority: Normal  
16/08/2024 13:37 (UTC+0)

1

Jen  
Fri, 16 Aug at 09:53  
CANCELLED?  
The mail is going nuts  
Damn this is unfair because it's also not me  
Everything now looks like it's me  
Maybe not to you  
No it totally does look like his side!

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EXCLUDED

INCLUDED



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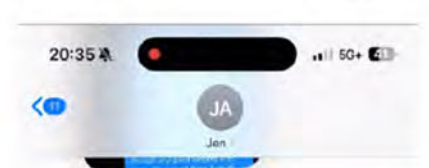
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28

From: Melissa Ruffalo  
To: Jessica Abel (work)  
We can't write it down to him  
We can't write we will destroy her. We will go to this. We will do this. We will do this.  
Reply: Normal

From: Melissa Ruffalo  
To: Jessica Abel (work)  
He has to look at it as an information document for us to be armed with  
That's all. Imagine if a document saying all the things that he wants ends up in the wrong hands.  
Reply: Normal

Fri, Aug 2 at 6:18 AM



We can't write it down to him  
We can't write we will destroy her.  
We will go to this. We will do this.  
We will do this. We will do this.

INCLUDED

Of course not. But I told him that's  
the point of talking through

EXCLUDED

He has to look at it as an information  
document for us to be armed with  
That's all. Imagine if a document  
saying all the things that he wants  
ends up in the wrong hands.

INCLUDED

The work is not the document. The  
work is the fucking crisis lol

EXCLUDED

If it's any consolation, he's like this  
with everything. Over thinks.  
Stresses. High anxiety.

EXCLUDED

He just needs to be educated on  
how this process works

EXCLUDED

DIRECT  
RESPONSE

you know we can bury anyone  
But I can't write that to him  
I will, I'll be very tough

INCLUDED

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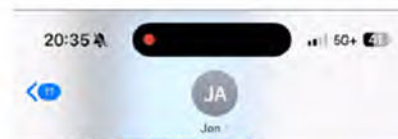
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We will go to this. We will do this.  
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Stresses. High anxiety.

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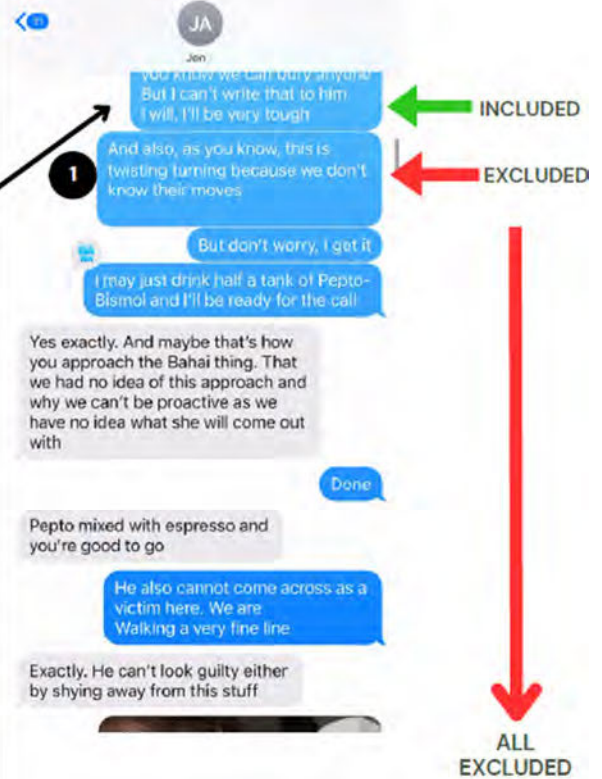
EXCLUDED

DIRECT  
RESPONSE

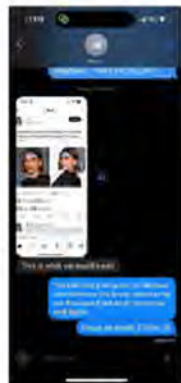
you know we can bury anyone  
But I can't write that to him  
I will, I'll be very tough

INCLUDED

14. Ms. Nathan followed this by assuring Ms. Abel: "*you know we can bury anyone. But I can't write that to him.*"



15. A few days later, on August 5, 2024, Mr. Baldoni set the narrative for the social media campaign, sending Ms. Abel a screenshot of a thread on X that had accused another female celebrity of bullying women. Mr. Baldoni stated, "*this is what we would need.*"



16. Ms. Abel responded that she had just "spoke[n] to Melissa about this... about what we discussed last night for social and digital." Ms. Abel added, "Focus on reddit, TikTok, IG." With reassurance that Ms. Lively would be "destroy[ed]" and "buried," Wayfarer and Mr. Baldoni directed Ms. Nathan and her team to actively engage in their retaliatory "social manipulation" campaign.

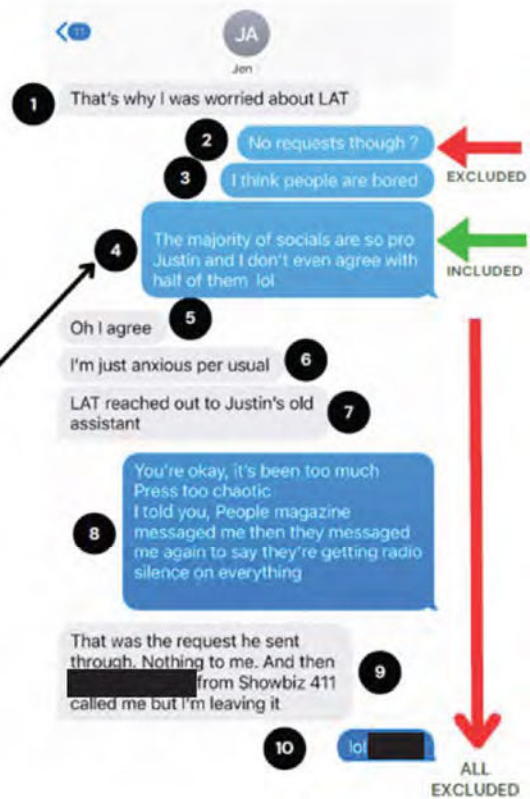


14 19. On August 10, the day after release of the Film, Ms. Nathan's team reported that  
15 they had "started to see shift on social, due largely to Jed and his team's efforts to *shift the narrative*"  
16 against Ms. Lively.

17  
18 From [redacted] Instagram New Contact  
19 Hi Blake - as the industry started picking up Daily Mail or Page Six, we're not going to keep  
20 an eye out and send pieces as needed, but so far it's been steady coverage on LAT,  
21 Showbiz 411, and we have started to see a shift on social. What we plan to do is send you some  
22 stuff to link the coverage. Thanks a lot for a spotlight on Blake and Ryan. Love you!  
23 We think it's great they sent us something and we'll be sure to send an update in the meantime.  
24 Please let me know if you need anything else.

20. That same day, Ms. Nathan noted that as part of this shift, "[t]he majority of socials  
21 are so pro Justin and I don't even agree with half of them [sic] lol."

22 From [redacted] Message Nathan  
23 The majority of socials are so pro Justin and I don't even agree with half of them. lol  
24 Please let me know if you need anything else.



4 18. The retaliation campaigns relied on more than just publicists and crisis managers  
5 spinning stories. They also retained subcontractors, including a Texas-based contractor named Jed  
6 Wallace, who weaponized a digital army around the country from New York to Los Angeles to create,  
7 seed, and promote content that appeared to be authentic on social media platforms and internet chat  
8 forums. The Baldoni-Wayfarer team would then feed pieces of this manufactured content to unwitting  
9 reporters, making content go viral in order to influence public opinion and thereby cause an organic pile-  
10 on. To safeguard against the risk of Ms. Lively ever revealing the truth about Mr. Baldoni, the Baldoni-  
11 Wayfarer team created, planted, amplified, and boosted content designed to eviscerate Ms. Lively's  
12 credibility. They engaged in the same techniques to bolster Mr. Baldoni's credibility and suppress any  
13 negative content about him.

14 19. On August 10, the day after release of the Film, Ms. Nathan's team reported that  
15 they had "started to see shift on social, due largely to Jed and his team's efforts to *shift the narrative*"  
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21 stuff to link the coverage. Thanks a lot for a spotlight on Blake and Ryan. Love you!  
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21. Ms. Nathan then bragged to Ms. Abel that Mr. Baldoni "doesn't realise how lucky he is right now," by which they were referring to their successful efforts to shut down stories that would have revealed how Mr. Baldoni's behavior including "sexual connotations" on set had made cast and crew (beyond Ms. Lively) "uncomfortable."

25 From: Matthew Nathan (beyond Abel witness)  
 To: Jen  
 Hey, didn't realise how lucky he is right now, we need to press on him just how fucking lucky.  
 (beyond Abel witness)

26 The whispering in the ear the sexual connotations like Jesus fucking Christ. Other members feeling uncomfortable watching it I mean there is just so much.  
 (beyond Abel witness)

JA  
 Jen

lol Roger

Yeah [REDACTED] reached out 1

[REDACTED] who just annoys me 2

And I saw that [REDACTED] said limited pickup, but I've honestly not seen ANY from those two pieces 3

4 Just keep on giving nothing

5 Nothing not one thing from those pieces

6 I mean, that was just a lot of work just talking everyone off the fucking ledge for those two pieces

7 Literally

8 I feel like I've been hit by a truck

9 And then after the weekend, people are going to move completely past it's boring now nothing came out for anyone

ALL EXCLUDED

21. Ms. Nathan then bragged to Ms. Abel that Mr. Baldoni "doesn't realise how lucky he is right now," by which they were referring to their successful efforts to shut down stories that would have revealed how Mr. Baldoni's behavior including "sexual connotations" on set had made cast and crew (beyond Ms. Lively) "uncomfortable."

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 (beyond Abel witness)

26 The whispering in the ear the sexual connotations like Jesus fucking Christ. Other members feeling uncomfortable watching it I mean there is just so much.  
 (beyond Abel witness)

JA  
 Jen

Omg yes you will die

25 He doesn't realise how lucky he is right now we need to press on him just how fucking lucky

26 The whispering in the ear the sexual connotations like Jesus fucking Christ. Other members feeling uncomfortable watching it I mean there is just so much

27 Doesn't matter if it's not true

28 I know I don't think they get that

29 They think the truth wins

30 No, it doesn't

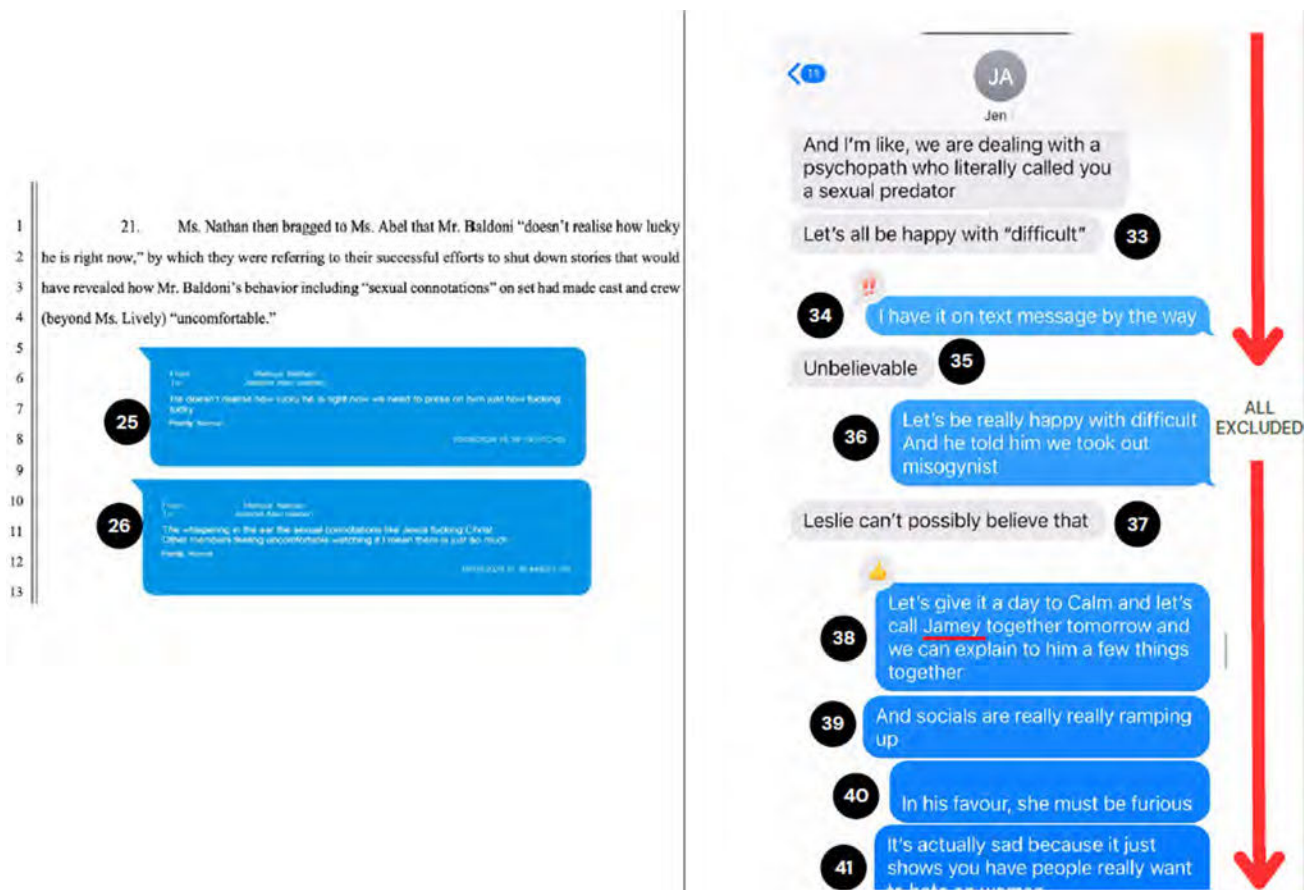
31

32 And I'm like, we are dealing with a psychopath who literally called you a sexual predator

33 Let's all be happy with "difficult"

INCLUDED

EXCLUDED



163. Meanwhile, Lively systematically excluded Baldoni from all marketing and promotional efforts with her and the cast for the Film. He was not invited to any cast promotional events, cast screenings, premieres, photo shoots, or other cast campaigns. Baldoni was marginalized from the marketing process. The purported “Marketing Plan” allegedly created by Sony, which was later referenced in Lively’s CRD Complaint as “agreed to by all” (and attached as an exhibit as fact even though it was merely “talking points” and not a binding contract), was never the plan Baldoni “agreed to.”



**"IT ENDS WITH US"****LOGLINE**

IT ENDS WITH US, the first Colleen Hoover novel adapted for the big screen, tells the compelling story of Lily Bloom (Blake Lively), a woman who overcomes a traumatic childhood to embark on a new life in Boston and chase a lifelong dream of opening her own business. A chance meeting with charming neurosurgeon Ryle Kincaid (Justin Baldoni) sparks an intense connection, but as the two fall deeply in love, Lily begins to see sides of Ryle that remind her of her parents' relationship. When Lily's first love, Atlas Corrigan (Brandon Sklenar), suddenly reenters her life, her relationship with Ryle is upended, and Lily realizes she must learn to rely on her own strength to make an impossible choice for her future.

Directed by Justin Baldoni and produced by Alex Saks, Jamey Heath, Blake Lively and Christy Hall. The film stars Blake Lively, Justin Baldoni, Jenny Slate, Hasan Minhaj, Amy Morton and Brandon Sklenar, from a screenplay by Christy Hall, based on the book by Colleen Hoover.

**POSITIONING**

- Blake Lively and Justin Baldoni are starring in the film adaptation of Colleen Hoover's highest-selling novel *It Ends With Us*.
- This is the first film of the Colleen Hoover phenomena to be adapted for the big screen. She is also executive producing.
- Justin Baldoni is also directing and executive producing.
- As well as starring, Blake Lively is also producing.
- Brandon Sklenar is perfectly cast as the charismatic Atlas who brings an impressive emotional depth to the role, along with Jenny Slate and Hasan Minhaj, who both bring compassion and humor to the film.
- Teen versions of Atlas and Lily are played by up-and-coming actors Alex Neustaedter and Isabela Ferrer, who deliver exceptional performances.
- IT ENDS WITH US is a big, emotional, complicated story about breaking free from the past and empowering yourself and your future. The character of Lily Bloom has resonated with so many readers because her journey is relatable – her story isn't black and white. She has to make hard decisions that have lasting consequences.
- This is a story about Lily's journey from leaving a small town, moving to Boston and embarking on a whole new life. She leaves behind a complicated childhood and in doing so discovers her own resilience and strength, empowering her to stand up to adversity.
- It's more than just a love story or love triangle – it's the story of Lily learning how to take agency of her future.
- After growing up in a home where Lily witnessed her mother being abused by her father and vowing never to be in that position, she enters a relationship with Ryle and unwittingly finds herself following the same footsteps as her mother. Through this journey, Lily must learn to stand up for herself and that true strength lies within.
- The book connected with millions of readers and became a rare phenomenon in the publishing world – everyone knows someone who has read this book.
- After becoming a "BookTok" cultural phenomenon with over 2 billion views on her TikTok hashtag, Colleen Hoover is currently the best-selling novelist in the US with over 25 million books sold by the end of 2023. Hoover wrote five of the top 10 best-selling print books of any genre in 2022.
- Published in 43 foreign languages, *It Ends With Us* was the top selling print book of 2022, has been on the New York Times Best Seller List for over 135 weeks by the end of 2023.

**WHAT TO AVOID**

- Focus more on Lily's strength and resilience as opposed to describing the film as a story about domestic violence. Empowerment is not just about standing up to adversity, but also about having the power to overcome within oneself and grow from it and developing agency to shape the future.
- Avoid talking about this film that makes it feel sad or heavy – it's a story of hope.
- Avoid talking about the film being representative of every woman's story. There are many stories of domestic violence, and this is just one perspective that is inspired by Colleen Hoover's own experiences growing up.

**ONLY IF ASKED**

***Any questions about the story not being an authentic representation of domestic violence:***

This is just one perspective that is inspired by Colleen Hoover's own deeply personal story of growing up in Texas.

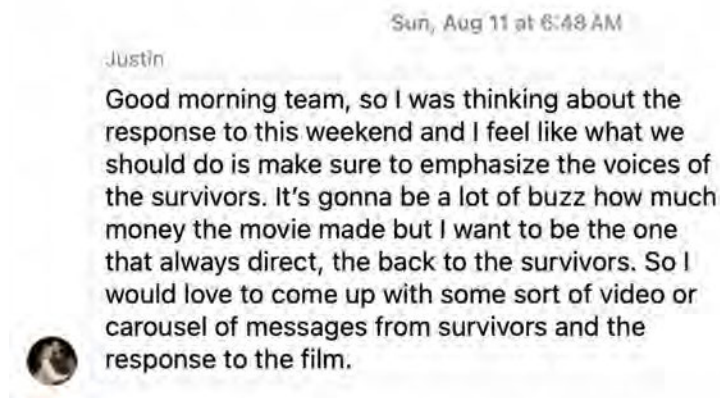
***Any questions about the lack of diversity in the cast:***

We have such a wonderful cast who all bring something unique in telling this powerful story of one woman learning to take agency over her future. I'm so proud to be part of an incredible group of women who have to make this film that is inspired by Colleen Hoover's own deeply personal story of growing up in Texas.

**OVERALL GUIDANCE:**

- Keep in mind that the journalists only use a small portion for their final pieces, so we need to provide sound bites and, at most, two to three sentence answers. Anything longer will be cut or misconstrued, especially given this sensitive topic and how quickly out-of-context answers spread on social. You can still get your messaging across, just with carefully chosen words.
- While IT ENDS WITH US is an emotional, complicated story, it is also about hope and breaking free from the past and empowering yourself and your future. We want to focus on the positive elements in interviews. Discussing abuse, how abusers or the abused are perceived outwardly, takes us down a path that is not only dark but will detract from the primary messaging.
- Digging too deeply into personal stories will not only take time, but they will not be picked up by the media and they will go unused. It also opens the door for journalists to direct the conversation away from the movie.

In fact, against much resistance from the Film's distributor, Baldoni, from day one, made it clear that he was making this Film to bring awareness to domestic violence and would not refrain from doing so when promoting the Film. He did not "go rogue," as Lively alleges.



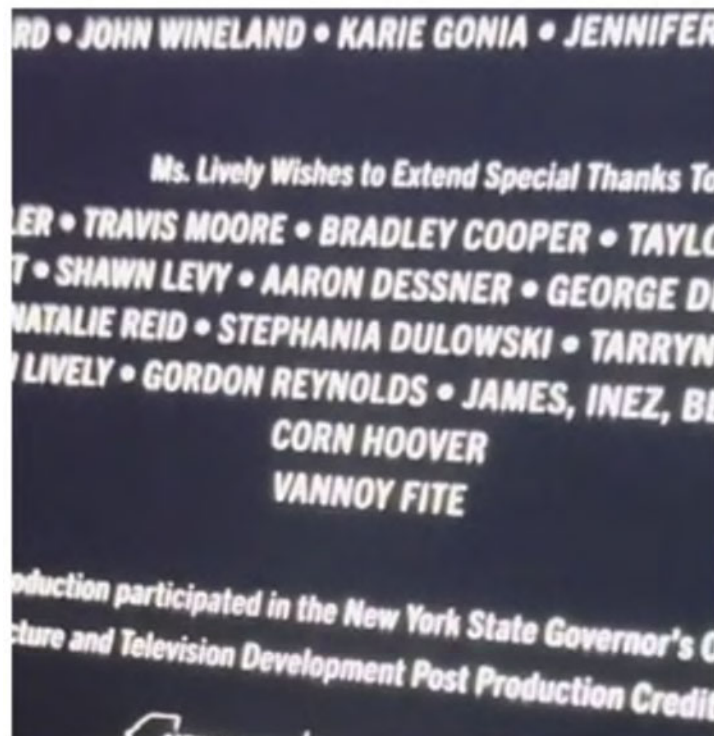
164. Throughout this period, Reynolds and Lively continued to leave "bread crumbs" in their campaign for mocking and bullying Baldoni. On July 26, 2024, the film "Deadpool & Wolverine" premiered, starring Reynolds. The film contained a new character named "Nicepool,"



also portrayed by Reynolds. Reynolds portrayed Nicepool as a vicious caricature of a “woke” feminist before concluding the character’s arc with his violent shooting death at the hands of “Ladypool,” a character voiced by Blake Lively. Upon information and belief, the Nicepool scenes were added to the movie and filmed in January 2024, after the January 4 confrontation in Reynolds and Lively’s apartment, and were intended to be a transparent and mocking portrayal of Reynolds’ warped perception of Baldoni. Nicepool commented inappropriately on a female character’s attractive body after childbirth and excused his remark by claiming he identified as a feminist. Nicepool also made reference to an “intimacy coordinator” and even used a hairstyle that mirrored Baldoni’s previously longer hair.



165. This is further borne out by the fact that, in the credits for “It Ends With Us,” Lively expressly thanked “Gordon Reynolds,” the false name that Reynolds used for his credit for portraying Nicepool.



Cast (in credits order) verified as complete



Ryan Reynolds

... Wade Wilson / Deadpool / Nicepool (as Gordon Reynolds)

166. While in Sweden celebrating his wife's birthday, Baldoni was informed that Lively demanded he not attend the Film's premiere on August 6, 2024. Lively further threatened that if Baldoni attended the premiere, she and the majority of the cast would boycott. It remained unclear what Lively had communicated to or promised the cast, but they now also refused to attend if Baldoni was present. The fact that Sony advised Wayfarer to concede underscores Lively and Reynold's immense power and influence.

167. Baldoni and Wayfarer refused to succumb to the bullying tactics aimed at excluding them from the premiere of their Film—a project they had financed, produced, and owned. This threat marked the culmination of a year-long campaign of intimidation, harassment, and civil extortion. Although objectively egregious and shocking, the Wayfarer team had unfortunately



grown accustomed to the bullying, fully aware of the immense power this couple wielded and the far-reaching extent of their influence. However, they refused to give in to this entirely unreasonable demand and valiantly searched for a compromise with Lively so that they could attend the premiere of the Film that Baldoni had directed and co-starred in and that Wayfarer had co-financed and produced. Heath moved mountains to negotiate a scenario that Lively would permit (with the help of Sony, as Lively refused to speak to anyone connected with Wayfarer).

168. Just days before the Film's premiere, Baldoni was still unsure if he would be "allowed" to attend. His friends and family, most traveling from outside New York, were left in limbo, unable to finalize travel plans or book flights. Baldoni did the best he could to hide his pain. Despite still not having seen the final cut of the movie *he co-starred, co-financed, and directed*, he wanted to celebrate the culmination of his years of work with his family and friends.



169. Finally, through Sony, Wayfarer persuaded Lively to “permit” Baldoni and the Wayfarer team, along with their friends and family, to attend—though only under demeaning and humiliating conditions. They were relegated to a separate theater to view the Film, required to arrive at a different time than the rest of the cast, and instructed to leave the red carpet immediately once Lively arrived. Baldoni was also excluded from the official celebrity after-party, despite it being an event ultimately paid for by Sony *and Wayfarer*. As a result, Baldoni had to quickly organize and fund a separate after-party for himself and the Wayfarer team, forcing the company to cover the costs for two events—one for Lively and everyone else, and one for Baldoni and Wayfarer’s own friends, family, crew, and team.

170. Upon arrival, Baldoni began participating in red carpet photos and interviews absent the presence of the remainder of the cast. However, his time on the red carpet was abruptly cut short when it was conveyed that Lively was on her way, and he was instructed to stop immediately. He and his family were quickly ushered away. Security personnel, acting as though there was a risk of “escape,” escorted Baldoni’s group to the basement of the building. There, they were confined to a makeshift holding area surrounded by concession stand stock, with only fold-out tables and chairs arranged in a square. Surrounded by close friends, family, soda bottles, and a lot of love, the irony of being held in a basement on what was arguably one of the most important nights of Baldoni’s career thus far, was not lost on anyone.







171. Once the main theater was deemed “clear” of Lively and her guests, Baldoni and his group were ushered into a separate theater to view the Film. At the conclusion of the screening, they were again quickly escorted out of the building by security to avoid even a chance of interaction with Lively or her guests. The Wayfarer after-party, held separately from the celebrity event and attended by crew, family, and other Wayfarer friends, was a “dry” gathering, in part to acknowledge the known negative relationship between alcohol and domestic violence. It was attended by the entire Wayfarer team from Los Angeles and their friends and family. The atmosphere and tone of the Wayfarer after-party were aligned with Baldoni’s vision for the Film, focusing on celebration and gratitude, despite being humiliated.

172. In the meantime, Baldoni was sidelined as Lively and Sony pressed forward with their promotional strategy for the Film. By contrast, Baldoni’s marketing plan, outlined in his initial proposal to Sony years prior, shared with Lively, and communicated numerous times to both

Sony and Lively, centered on a partnership with the organization No More. Founded in 2013, No More is a global initiative aimed at raising awareness, inspiring action, and sparking conversations to end domestic violence and sexual assault. Wayfarer's collaboration with the organization began in 2022 and held deep personal significance for both Wayfarer and Baldoni. Staying true to his purpose for undertaking the Film, Baldoni prioritized amplifying the voices of survivors of domestic violence. His efforts reflected the heart of the Film's story and its profound impact on audiences. He returned to the core reason for embarking on the project in the first place—his initial outreach to the author of *It Ends With Us* five years earlier. Focusing on the Film's message and its potential to create positive change, Baldoni poured himself into ensuring its success despite the mounting challenges. These genuine efforts, aimed at amplifying the voices of survivors impacted by the Film, were later mischaracterized and weaponized against Baldoni.

173. In the end, empowered by her celebrity firepower and her powerful allies, Lively did exactly what she set out to do: She took someone else's movie for her own, destroying years of creative vision and careful planning in service of her own brand-building campaign.

174. But why would Lively even seek to seize power over the Film? Why would she insist on taking on additional work for no additional pay or credit?

175. On information and belief, Lively may have been motivated by a number of factors. She may have wanted to seize control over the Film so that she could take over the production of the sequel, "It Starts With Us." This motivation also explains why the cast, who may have hoped and/or been promised a role in subsequent productions, would choose to side with the powerful couple, who themselves may genuinely believed they could destroy Baldoni and Wayfarer and force them to cede (or even sell) the rights to the sequel.

176. Or Lively may have felt driven to match her star husband Ryan Reynolds, who is widely reported to have insisted on taking so much control over the Film “Deadpool 2” that the director, Tim Miller, left the production.<sup>22</sup> Seeing the fame and success that Reynolds commanded, she may have adopted his oft-repeated pattern wholesale to seize her own power and control. Following his lead, and evidenced by many statements by Lively that he is involved in every project she works on and vice versa, Lively and Reynolds, accustomed to getting their way, perhaps felt entitled.

177. Regardless of *why* Lively insisted on seizing control of the Film, that is precisely what she did. There can be no justification for her Machiavellian and civilly extortionate tactics deployed to grab complete control over the Film.

178. Lively also sought ultimate control over the Film in the hope of boosting her own brand and business ventures. In the end, though, Lively’s own words and promotional strategy led to an avalanche of negative press.

#### **G. Lively’s Power Grab and Catastrophic Miscalculation Collapse On Her**

179. Starting at least July 10, 2024, Lively’s social media posts promoting the Film maintained a lighthearted, frothy attitude, depicting Lively in glamorous and floral-inspired couture, highlighting high-end brands like Chanel and Christian Louboutin.

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<sup>22</sup> See Philip Ellis, *Deadpool Director Tim Miller Says He Left the Franchise Because of Ryan Reynolds* (Nov. 24, 2019), <https://www.menshealth.com/entertainment/a29931219/ryan-reynolds-deadpool-tim-miller/>





blakelively and 3 others



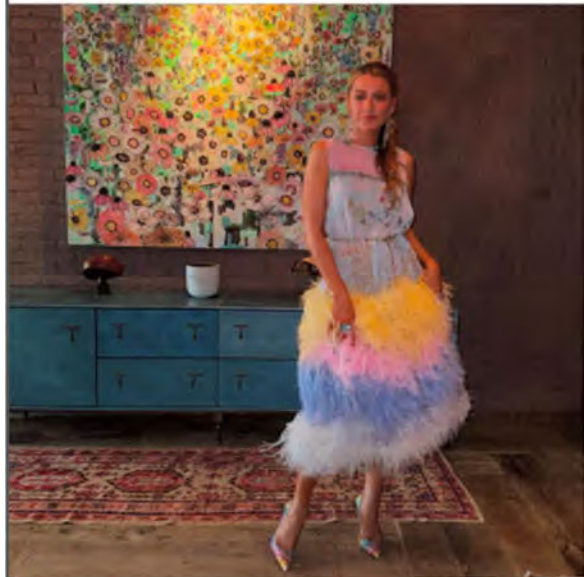
♡ 765K ▼ 5,347



blakelively If audiences had half the amount of fun we did, we're gonna put theme parks outta business. 🤔 In 20 years of doing this, I don't think I've ever experienced anything quite like surprising 2500 fans with an early preview of @itendswithusmovie 🙏 to everyone who showed up in their floral jeans alongside us, including @brandonsklenar (jeans handmade by me & @isabela.ferrer 🌸🥰🌸) @colleenhoover being MOTHER in every way, turning it OUT for everyone at @book.bonanza



blakelively and itendswithusmovie

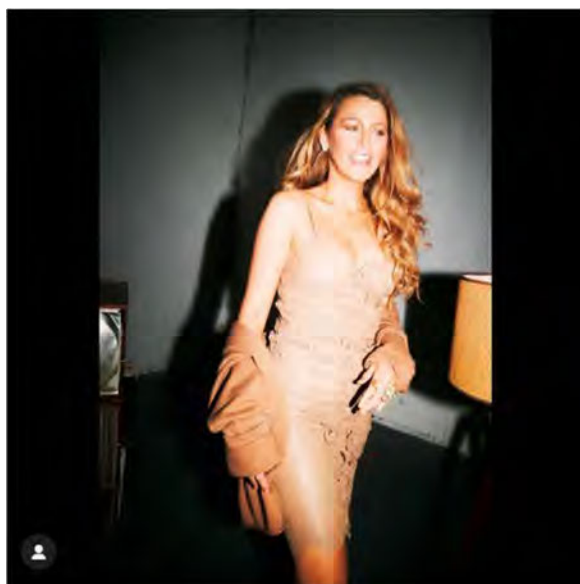


♡ 1.1M ▼ 8,358



blakelively It's not ever lost on me that I get to play dress up for a living 🤔🥰💖🌸 @itendswithusmovie 🌸 ONE WEEK AWAY!!

👉 hand painted nails by @enamelle deserve their own post. The flower nails she's turning out for @itendswithusmovie are 🥰  
 👗 the dreamy @dauphinette.nyc of course  
 👠 @louboutinworld who else 💖🌈  
 💎 @lorraineschwartz always taking my breath away. You are one of one



797K 2,042

blakelively 🌸 flower fashion time: Atlas' Living Room edition 🌸 \*I would say something more interesting but it's 2:23 am and I need to sleep. If my alarming sleep deprivation in order to post floral fashion doesn't tell you how much I care about @itendswithusmovie I don't know what does.

Which reminds me to mention, the floral stems on these heels are insane. I wish I had a better picture 🙄. K getting a life (or at least some sleep). ByeEEEE zzz

July 29, 2024



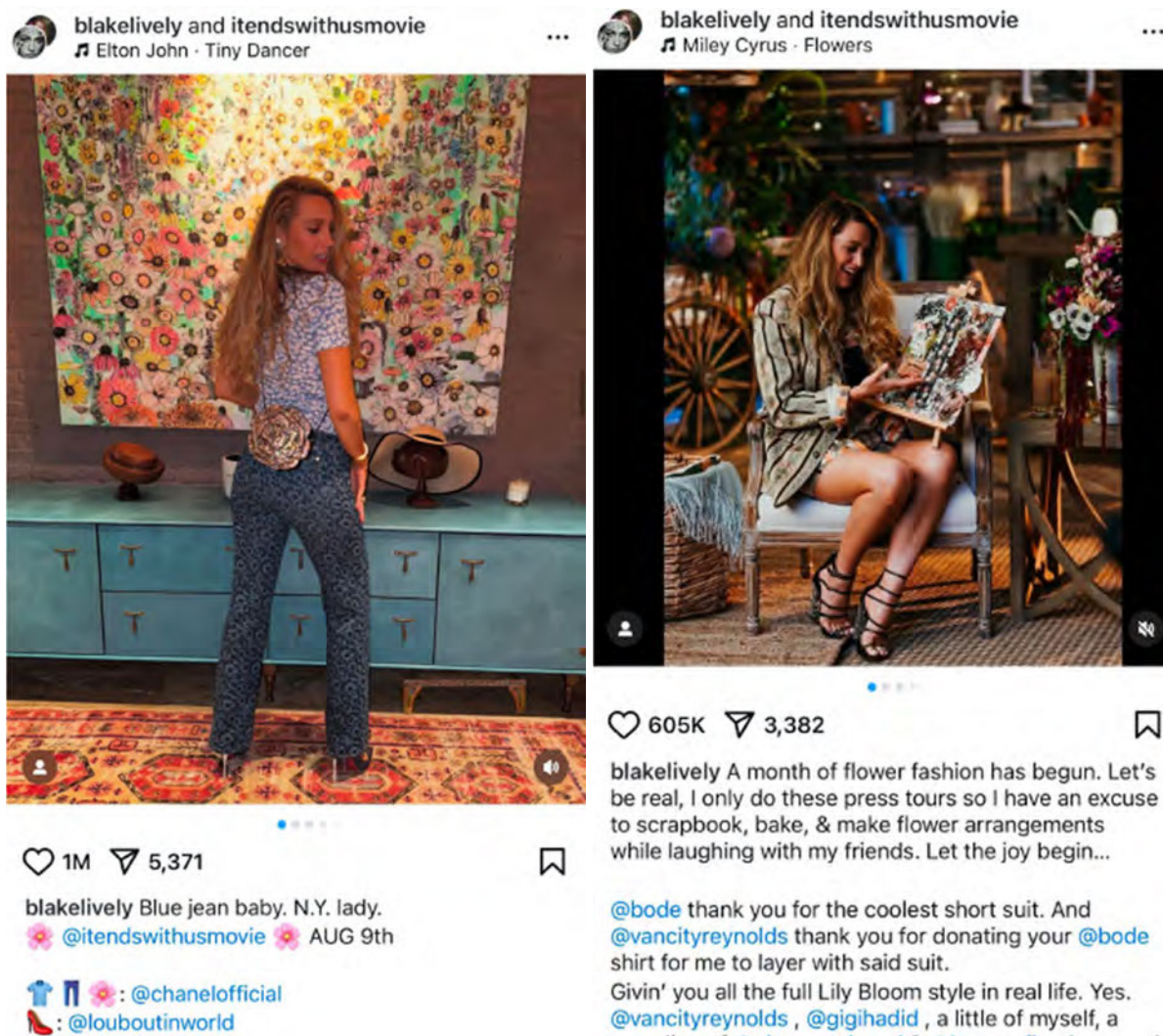
1.6M 10.3K

Liked by [redacted] and others

blakelively This dress is 30 years old but doesn't look a day over 25 🤔

🌸 @itendswithusmovie 🌸 Aug 9... more

August 3, 2024



180. Lively freely interspersed posts about her new movie with ads for her new hair care line, Blake Brown. Upon information and belief, the launch of Blake Brown was timed to coincide with the Film's release in the hope that cross-promotional opportunities would boost sales for Lively's new brand.





181. Lively also sprinkled in cross-promotions with her alcohol brand, Betty Booze. This was a massive error in judgment. Social media commenters quickly pointed out that this tie-in was in particularly poor taste, given that the World Health Organization estimates that 55% of domestic violence incidents are linked to alcohol.<sup>23</sup>

<sup>23</sup> Stacy Mosel, *Female Domestic Violence and Alcohol Use* (Nov. 2, 2023), <https://alcohol.org/women/domestic-abuse-and-alcoholism/>



182. Tellingly, Wayfarer spotted the issues and called for a course correction long before Lively apparently realized the magnitude of her miscalculation. Wayfarer CEO Heath responded to the organic online criticism by noting that “many people are pointing out that the DV [domestic violence] is being glossed over and that Justin is essentially the only one appreciating the subject matter whilst others may be not giving it the proper respect it deserves. *As you know, this has always been a concern of ours . . . .*”



WAYFARER

Jamey Heath

## Observations...

3 messages

Jamey Heath

Fri, Aug 9, 2024 at 8:35 PM

To: Sony Team

Jennifer Abel

Hey all,

So we all see the noise and chatter regarding Justin and Blake and cast. This is all crazy. But...I'd like for us to take a look at, that even in the midst of "feuding", how many people are pointing out that the DV is being glossed over and that Justin is essentially the only one appreciating the subject matter whilst others may be not giving it the proper respect it deserves. As you know, this has always been a concern of ours and I think we might agree that there is enough response to at least consider giving it a bit more thought.

We are opening with great numbers and that is a testament to the movie itself and also the way you've positioned it. No doubt. And... we should listen to the responses and really embrace what we are hearing. It won't hurt the movie by being more deliberate in embracing the DV aspect. People need to know that we too recognize the gravity and sensitivities of this subject.

Looking forward to your thoughts.  
Jamey.



Jamey Heath  
CEO  
Wayfarer Studios

183. Wayfarer's Vice President of Marketing and Communications shared a post exemplifying the issue, which included the tagline, "grab your friends, wear your florals," that soon became viral for all the wrong reasons.

Wayfarer's VP of Marketing and Communications

Sun, Aug 11, 2024 at 6:09 AM

To: Jamey Heath

Cc: Sony Team

Jennifer Abel

Good morning.

Sharing this post that's using the exact language that has been called out for inappropriately marketing the film

<https://www.instagram.com/reel/C-dIFmsPeWH/?igsh=dzljY3I2MWsyADFh>



184. Heath and others at Wayfarer advised listening and responding to the wave of online criticism that had met the bubbly, sunny messaging that Lively herself embraced so wholeheartedly. Though Lively now claims that Heath, Baldoni, and others at Wayfarer sabotaged her by planting “astroturfed” media criticisms of Lively, it seems that if she had listened to and respected the Wayfarer Parties’ perspective and insights on the unique sensitivities of marketing the Film, rather than seizing the helm and then driving the ship aground, everything would still be coming up roses for her. Most importantly, had she allowed Baldoni to take his rightful place side-

by-side with her in the promotion of the Film, Baldoni would assuredly have kept domestic violence in the spotlight during all promotions, which would assuredly had prevented her from hurting her own image. Lively's reputational backlash was entirely her own doing.

Jamey Heath [REDACTED] Sun, Aug 11, 2024 at 2:54 PM  
 To: [REDACTED]  
 Cc: Sony Team [REDACTED]

[REDACTED], Jennifer Abel [REDACTED]

To be clear. We are not saying it's been inappropriately marketed in any way. In fact, you all have been brilliant. Thank you. Extremely honored to be partners with you. It's been fantastic. The proof is in the pudding.

This post is only pointing to the ones who have spoke about the marketing, and while I am not dissuaded by their commentary, it's good to take some learnings from it.

I know and trust you understand the point and I look forward to discussing it with you all.

Congratulations on a huge huge success. You play a big and amazing part in it.

Thanks again.  
 Jamey



Jamey Heath  
 CEO  
 Wayfarer Studios  
 [REDACTED]

185. But once the backlash started on social media, without any effort by Lively to course-correct and entirely without any involvement or effort by Baldoni, it rapidly spread to mainstream media. See, e.g., Natasha Jokic, *Here's What's Going On With The 'It Ends With Us' Drama* (Aug. 12, 2024), <https://www.buzzfeed.com/natashajokic1/it-ends-with-us-blake-lively-justin-baldoni>; Carly Johnson and Lillian Gissen, *Blake Lively goes into damage control FINALLY addressing the domestic violence in It Ends With Us Amid Criticism over 'tone deaf' film promo* (Aug. 13, 2024), <https://www.dailymail.co.uk/tvshowbiz/article-13740773/Blake-Lively-address-domestic-violence-Ends-film.html>; Lillian Gissen, *Blake Lively fans blast It Ends With Us actress over 'tone deaf' and "shallow" interview with costars* (Aug. 12, 2024),

<https://www.dailymail.co.uk/femail/article-13739569/blake-lively-tone-deaf-domestic-violence-interview.html>; Elyse Wansehl, *People Are Disgusted By Blake Lively's Cutesy Press Tour For 'It Ends With Us'* (Aug. 14, 2024), <https://www.dailymail.co.uk/femail/article-13739569/blake-lively-tone-deaf-domestic-violence-interview.html>; Eboni Boykin-Patterson, *Blake Lively Dragged for Marketing Light of Domestic Violence* (Aug. 14, 2024), <https://www.thedailybeast.com/blake-lively-dragged-for-making-light-of-domestic-violence/>; Alex Abad-Santos, *Why is everyone mad at Blake Lively?* (Aug. 15, 2024), <https://www.vox.com/culture/367451/blake-lively-it-ends-with-us-press-tour-controversy>; Olivia Craighead, *Fans Are Not Impressed with Blake Lively's Press Tour* (Aug. 15, 2024), <https://www.thecut.com/article/blake-lively-it-ends-with-us-press-tour-tone-deaf.html>; Carolyn Gevinski, *The It Ends With Us promo has failed domestic violence survivors like me* (Aug. 16, 2024), <https://www.glamourmagazine.co.uk/article/it-ends-with-us-domestic-abuse-first-person>; Angela Yang, *Blake Lively's 'It Ends With Us' promotion called 'disrespectful' by some survivors of abuse* (Aug. 19, 2024 <https://www.nbcnews.com/pop-culture/blake-lively-it-ends-with-us-promotion-criticism-rcna167175>); Arwa Mahdawi, *Sorry, Blake Lively: using a movie about domestic violence to sell stuff is not a good look* (Aug. 20, 2024 <https://www.theguardian.com/commentisfree/article/2024/aug/20/blake-lively-it-ends-with-us-colleen-hoover>); Hannah Holland, *'It Ends With Us' was already problematic. Blake Lively's press tour made it worse.* (Aug. 27, 2024), <https://www.thecut.com/article/blake-lively-it-ends-with-us-press-tour-tone-deaf.html>.

186. Indeed, while Baldoni sought to focus on the Film's central premise, Lively incensed audiences with seemingly flippant and thoughtless remarks, encouraging viewers to

“grab your friends” and “wear your florals.” Embarrassed and enraged by this self-induced backlash, Lively now seeks to vilify Baldoni in a dubious attempt to resuscitate her public image.

#### **H. Lively Seeks to Push the Blame Onto the Wayfarer Parties**

187. Upon information and belief, Lively ordered her team to begin a campaign to frame herself as a martyr and pin the blame on the Wayfarer Parties. Behind the scenes, Lively’s publicist, Leslie Sloane, devised and executed a smear campaign of her own against Baldoni. Known for her tendency to leak sensitive stories to provoke public controversy,<sup>24</sup> Sloane reneged on an agreement with Nathan by continuing to disseminate false and defamatory stories about Baldoni and Wayfarer, a process she had begun long before Wayfarer and Baldoni ever retained Nathan.

188. At 10:11 a.m. (PST) on August 8, 2024, Nathan and Sloane reached an agreement whereby neither would communicate directly with a reporter prior to informing the other. Nathan states, “I am not doing one thing without speaking to you[,]” to which Sloane responded, “Me either[.]”

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<sup>24</sup> See, e.g., Guy Adams, *A Divorce Battle, A PR War* (July 8, 2024), <https://www.independent.co.uk/news/world/americas/a-divorce-battle-a-pr-war-7922529.html> (reporting that Sloane allegedly arranged paparazzi photo shoots and pushed stories about Scientology to sway public support for Katie Holmes in Tom Cruise divorce); see also Tatiana Siegel, *Harvey Weinstein Backing Publicist Leslie Sloane’s New Venture* (April 18, 2014), <https://www.hollywoodreporter.com/movies/movie-news/harvey-weinstein-publicist-leslie-sloane-697636/> (reporting on Sloane’s acrimonious split from BWR to start her Harvey Weinstein-backed PR firm).

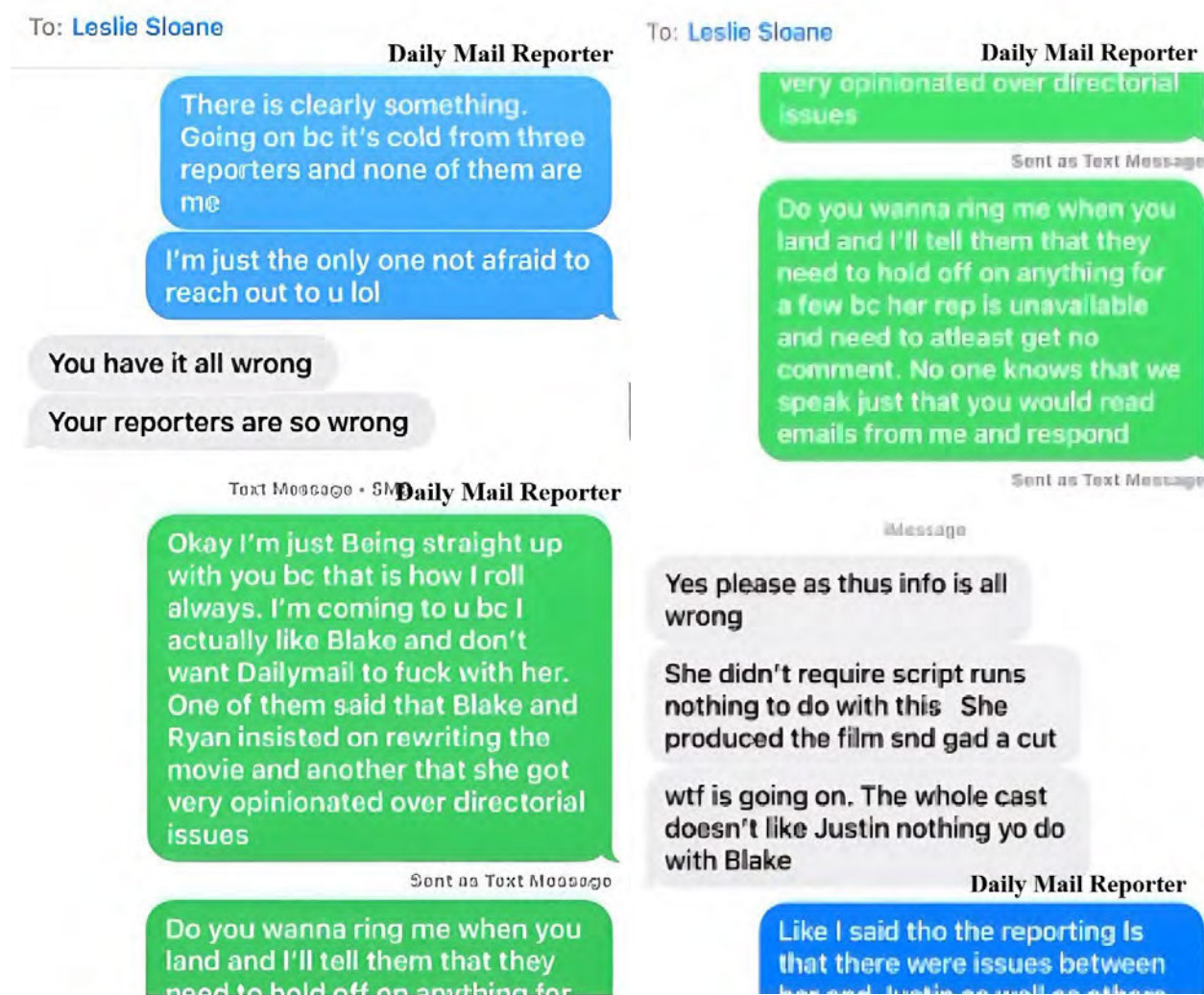


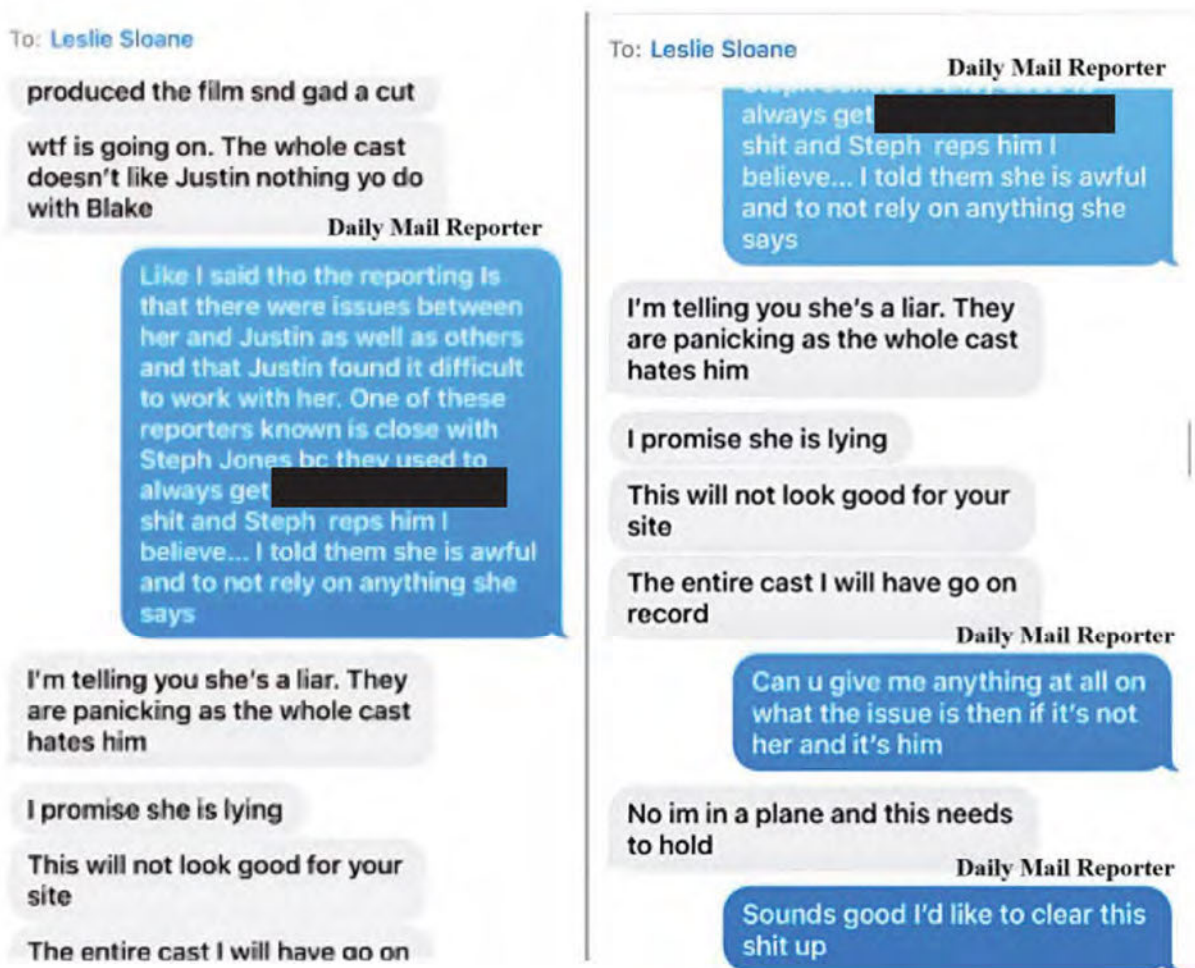


189. Just nine minutes later, Sloane breached her agreement with Nathan by engaging with a reporter at the Daily Mail. The reporter asked to speak with Sloane “regarding prob[lem]s on the set involving [Blake Lively] and Justin Baldoni and the fallout over that with Blake being labeled difficult and a power struggle existing.” Sloane, without consulting Nathan, promptly responded, “That is 1000 percent untrue[,]” and further, “Your info is totally off[.]” It is evident that Sloane never intended to honor her agreement with Nathan. Instead, she exploited the arrangement to gain a strategic advantage in the media.



190. In fact, Sloane actively continued her discussions with the Daily Mail reporter, seeding false information to cast Baldoni in a negative light. To divert attention from Lively's tyrannical behavior on set, Sloane attempted to portray Baldoni as the antagonist, stating, "The whole cast doesn't like Justin nothing to [sic] do with Blake[.]" She doubled down, insisting, "I'm telling you she's a liar. They are panicking as the whole cast hates him[.]" Sloane also threatened the reporter, saying "The entire case I will have go on the record . . . this needs to hold."





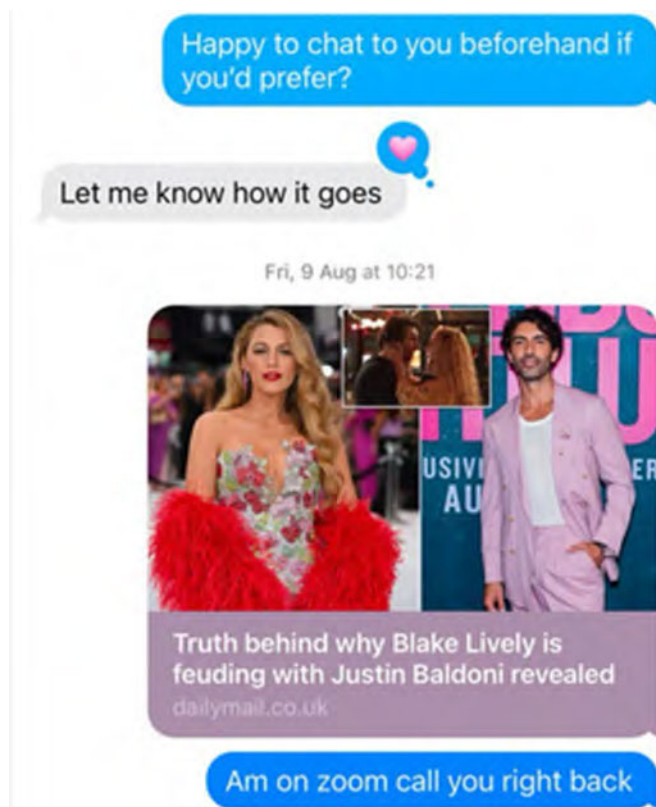
191. At 7:59 a.m. (PST) on August 9, 2024, Nathan, consistent with the pair's agreement, sent a text message to Sloane containing an email she had received from a Daily Mail reporter. Unbeknownst to Nathan, this was the same reporter with whom Sloane had been communicating the day prior. Nathan confirmed that she played no part in the story and told Sloane, "I'm going to have to speak with him, but I'm just going to tell him nothing[.]" She added, "Happy to chat to you beforehand if you'd prefer." Sloane deliberately omitted the fact that she had spoken with the reporter just 24 hours prior, stating "Let me know how it goes."

Fri, 9 Aug at 07:59



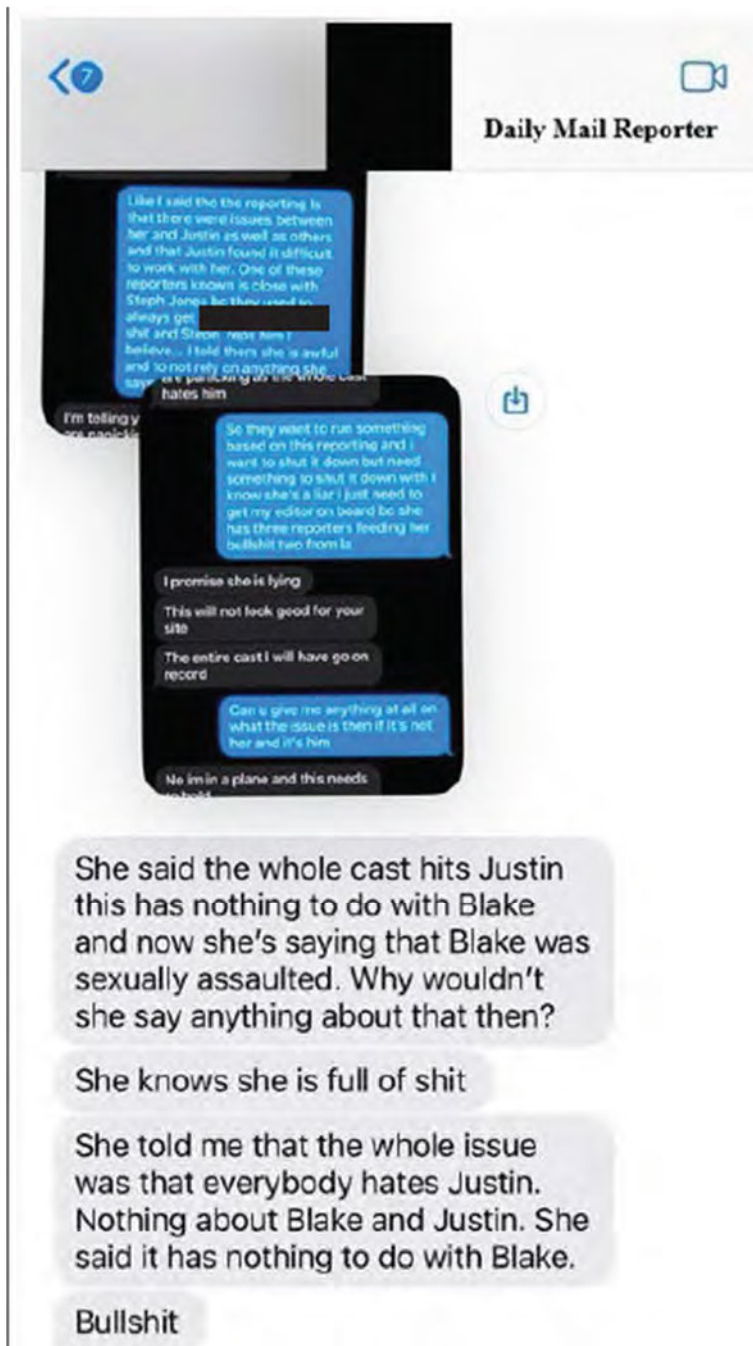
Morning - I just got this.  
I'm going to have to speak to him,  
but I'm just going to tell him nothing





192. Despite their agreement, Nathan was completely unaware that Sloane had provided the reporter with information that significantly altered the narrative of the published story. Indeed, the reporter originally sought to publish a story about “Blake being labeled difficult” on set. After the reporter’s discussion with Sloane, however, the story changed to “We have learned that Justin Baldoni caused issues on the set . . . .” Not only did Sloane breach her agreement with Nathan, but she planted false and defamatory information about Baldoni to distract from Lively’s numerous missteps and throw Wayfarer and Baldoni on the defensive.

193. Following the release of Lively’s administrative complaint on December 20, 2024, the same Daily Mail reporter informed Nathan that Sloane had lied to portray Baldoni as the foe. Yet still, Sloane escalated the false narrative by telling the reporter that Blake was “sexually assaulted”—an unsubstantiated accusation that not even Lively had gone so far as to claim, designed to destroy Baldoni and his reputation.



194. Sloane ruthlessly took advantage of Nathan's good faith. As a result, Nathan was forced to combat the negative press that was both planted and propagated by Sloane. Ultimately, the actual smear campaign was orchestrated by Sloane, at Lively's direction.

**I. Jones Offers Ammunition for Lively's Revenge—And Her Own**

195. Enter Stephanie Jones, Wayfarer's and Baldoni's embattled former publicist and a critical player in Lively's scorched-earth campaign against Baldoni, Wayfarer, and their teams.

196. Jones is the founder and CEO of Jonesworks, a New York-based public relations firm that Wayfarer engaged in May 2020 and that later handled publicity for Baldoni personally.

197. For almost four years, the Jonesworks Baldoni/Wayfarer account was managed by Jen Abel, Jones's right-hand, who ran the Jonesworks Los Angeles office. Abel developed a close and trusting relationship with Baldoni, Heath, and the rest of the Wayfarer team, particularly as their strategic communications needs became ever more complex due to the Lively Parties' machinations.

198. Long known within the public relations industry for her disarming Southern twang, brass-knuckle tactics, and high turnover of clients and employees, Jones has had a successful career, having founded Jonesworks and represented, at various times, Dwayne "The Rock" Johnson, Jeff Bezos, Lauren Sanchez, Venus Williams, Tom Brady, and Chris Hemsworth.

199. Until recently, however, Jones had kept her worst excesses hidden from public view.

200. That changed in or around May 2024, when Puck reported that Sanchez and Johnson had dropped Jones as their publicist. While these were among the most prominent and publicly reported departures, a cascade of Jonesworks clients began to cut ties with Jones, especially after word had spread that Business Insider was contacting Jones' former and current clients and employees concerning a forthcoming article about her sordid behavior.

201. On May 8, 2024, a website called "Stephanie Jones Leaks" went live, along with an X.com account, a Facebook page, a Reddit account, and a Pinterest page. These platforms

disclosed a litany of highly disturbing allegations about Jones' behavior and business practices, many concerning Jones' mistreatment of Jonesworks employees and clients.

202. These revelations caused a firestorm in Hollywood, resulting in a surge of negative publicity regarding Jones, including the publication of the Business Insider piece entitled "Who's afraid of Stephanie Jones." See Katie Warren and Jack Newsham, "Who's Afraid of Stephanie Jones," *Business Insider* (Aug. 17, 2024), <https://www.businessinsider.com/stephanie-jones-jonesworks-pr-clients-tom-brady-jeff-bezos>.

203. The Business Insider piece shed more light on the real Jones. Always a volatile personality, Jones had become noticeably more paranoid, erratic, and cruel in recent years.

204. The Business Insider story also shed light on the toxic workplace Jones had fostered at Jonesworks. At the office, Jones would regularly turn on deafening music so that she could berate her employees free from scrutiny. "I don't think there was one day in the office that someone wasn't crying," said a former employee.

205. Jones also pried into her employees' private lives without invitation. When employees called in sick, Jones would FaceTime them to confirm they were actually sick. In at least one instance, an employee who had taken a personal day to attend a funeral received a FaceTime call from Jones during the ceremony. Jones was apparently suspicious of his whereabouts.

206. Unsurprisingly, turnover rates at Jonesworks were extraordinary. These departures included not only junior employees—who often left after less than a year—but also senior executives who managed client accounts. Jones seldom allowed them to go amicably, often enlisting attorneys to threaten and intimidate them into agreeing not to disparage Jones.

207. In April 2023, Dwayne “The Rock” Johnson dropped Jonesworks after clashes between Jones and Johnson’s team. Jonesworks had handled Johnson’s personal PR, as well as that of his production company, tequila brand, clothing company, and business partner, Dany Garcia. This was a big loss for Jones and one that she kept under wraps from media in order to leverage opportunities for other clients. The same year, Jones was also dropped by Bezos, Sanchez, Lainey Wilson, Chris Hemsworth, Wheels Up, Ocean Spray, and Partake Foods.

208. Through it all, Jennifer Abel remained loyal to Jones, sticking with her through thick and thin despite growing doubts about Jones’ ability to function professionally. Jones had become increasingly hostile towards Abel, criticizing Abel’s management, displaying paranoia about her close relationships with clients and partners, and going out of her way to reprimand, demean, and embarrass Abel in front of junior employees she oversaw.

209. Over time, Abel became convinced that Jones was in a downward spiral and harbored serious concerns about Jones’ mental health. Jones had become increasingly erratic, calling and FaceTiming Abel at all hours of the night in a frenzied state, overtly pitting employees against each other, and attempting to “catch” them in perceived acts of disloyalty.

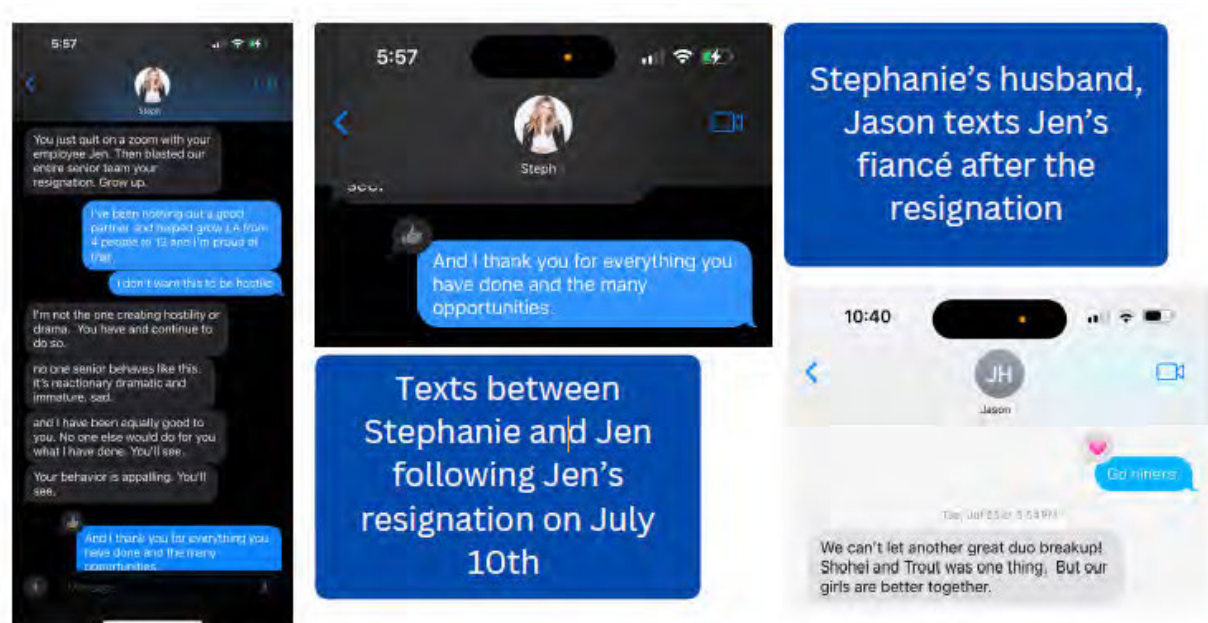
210. Jones had always been volatile, but her behavior had become downright deranged. Often, Abel was on the receiving end of her outbursts. For instance, Jones informed Abel’s charges that she had learned through psychic readings that Abel was an alcoholic and a gambling addict. *Neither has any basis in fact.* While Jones presumably intended to undermine Abel’s credibility, she had actually undermined her own and raised significant concern among the Joneswork staff about her mental stability. Jones also announced, per her psychic, that Abel would soon be pregnant with twins, humiliating and infuriating Abel, who—Jones knew—had struggled with fertility issues.



211. Already pushed to the brink, Abel finally had enough when Jones demanded she corroborate falsified accusations about a senior Jonesworks employee in an effort to drive him out. When Abel refused to go along with it, Jones responded with mockery, calling her a “12 year old drama queen.”

212. On July 10, 2024, Abel notified Jones of her departure from Jonesworks and intention to start her own business. Abel offered a six-week transition period, with an end date of August 23, 2024.

213. Predictably, Jones took the news poorly, to say the least. Consistent with her increasingly erratic behavior, Jones swung from extreme to extreme, one minute desperately attempting to convince Abel to stay, then next berating her and cutting her out.



214. While Abel was resolute about leaving, she had every intention of doing so amicably, a sentiment she repeatedly conveyed to Jones.

From: Jennifer Abel [REDACTED]  
 Sent: Friday, July 26, 2024 4:06 PM  
 To: Stephanie Jones [REDACTED]  
 Subject: Thank You

Hi Steph—

First of all, I wanted to say thank you for the call we had a couple days ago. I know it wasn't easy, and I'm so appreciative that you trust me enough to be vulnerable, honest and for us to have a real conversation about our working relationship. I know you are currently going through a lot with work, personal life and your health and the last thing I want to do is to add to that—I hope you know me well enough by now that no matter how dramatic I can be (🤪) I really do strive to make work life easier on you and take as much as possible off of your plate.

Since I resigned, I have been doing a lot of thinking about what I want with my career. I may have quit under unforeseen circumstances, but these past two weeks I have really taken a step back to reevaluate what I want for next steps. I really do believe that everything happens for a reason, and I wanted to really reflect on why things continue to escalate between the two of us and why I was constantly feeling like I was letting you down. I take full responsibility for my part in all of this. I'm not proud of how emotional I get in these situations, or the way I choose to step away when I feel like we are not making progress in our conversations. I know I have things to work on as well with my communication, and this whole situation has been a good learning moment for me on the ways I need to improve how I get my point across.

With all of this said, the facts remain—I respect you immensely. I feel so grateful for the opportunities you have given me with your premiere clients and how you have lifted me up as your partner. I would not have had the opportunity to be in many of the rooms that I have been in without you opening the door. This company you have built is exceptional, and I hold our teams with the highest regard. I know I didn't do it by myself, but I do take pride in what I have contributed to your LA office and the team I have been building and managing over the past four years, along with the new clients and opportunities I have procured.

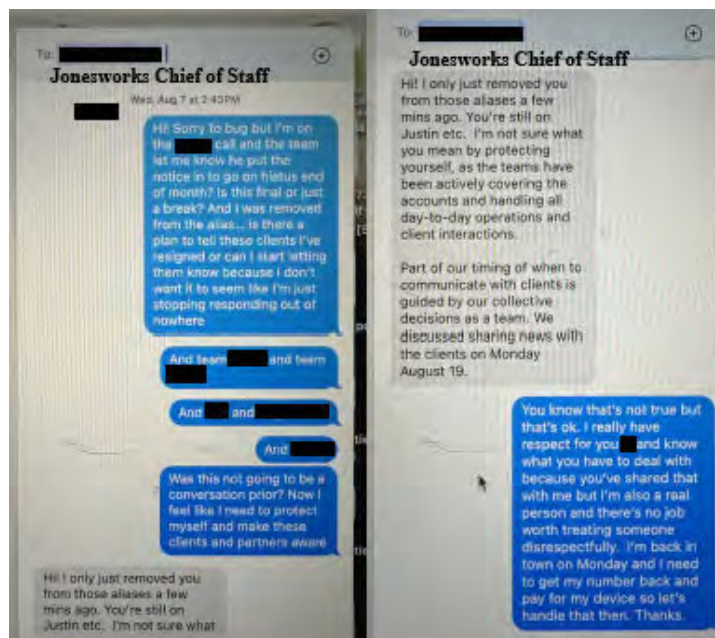
I do feel it's necessary at this point that I continue to move forward with my resignation. I say this with heavy heart, yet with the excitement that I can take everything that I have learned from you as I start on this new path with my own business. I know this path won't be easy, but I hope I can keep you in my life as a mentor, a friend and a close confidant because I truly view you as family and would be lost without your support. I want to assure you however I can, that unlike those who have burned you in the past, that there is not one ounce of ill will here. I have left a company before with grace and with my relationships intact, and that's what I fully plan on, and hope for. In order to plan, I will need to stick with my previously communicated end date of August 23<sup>rd</sup> which I hope is plenty of time to ensure a smooth transition for all.

I thank you again for the most amazing time here at JW and I look forward to our relationship continuing in this new capacity.

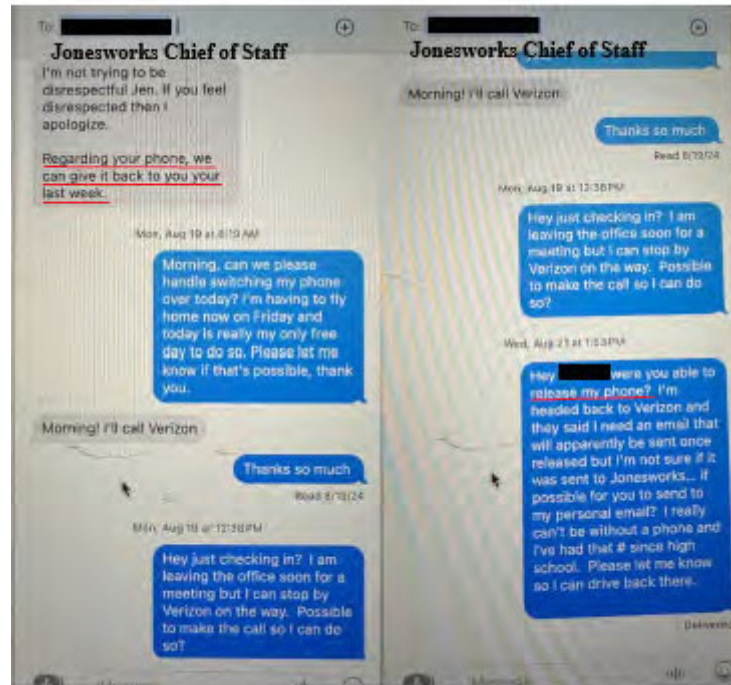
Thank you again for understanding and for your support— With LOVE!

—Jennifer

215. However, as Abel's end date drew closer, Jones grew more combative. With several weeks left in her tenure and innumerable client matters to handle, Abel found that she had been removed from client email distribution lists and left in the dark about meetings, calls, and events she was expected to attend. It was clear to Abel that Jones was trying to embarrass Abel and tarnish her professional reputation in advance of her departure.



216. In her final week, Abel contacted Jones' chief and staff concerning the release of her phone number. When Abel joined Jonesworks in 2020, she ported her existing phone number (which she had used since high school) and switched to a Jonesworks-issued iPhone. Knowing that she would have to turn over the physical device upon her departure, Abel arranged for her phone number to be "released" so she could port it to a new device and retain decades worth of personal contacts, photos, private conversations with friends and family, and confidential financial data and access accounts protected by two-factor authentication. Jonesworks' chief of staff assured her multiple times in writing that Jonesworks would cooperate and uphold their agreement.



217. On August 21, 2024, two days before her last day, Abel pulled up to the Jonesworks office in Beverly Hills. There, she was confronted by a physically imposing security guard, a lawyer sitting at a conference table covered in documents, an IT professional, and Jones' chief of staff (who had flown in unannounced from New York). Apart from Jones' chief of staff, Abel had never seen any of them before. After being ushered into the conference room, Abel saw that the security guard was posted just outside its doors, blocking the exit. There, the attorney pointed to the documents and told Abel, in a menacing and cold tone, to review and sign them. The attorney told her that Jonesworks believed she had proprietary information on her personal laptop and would likely have grounds to sue if Abel did not allow them access.

218. Completely caught off guard by this hostile and intimidating display, Abel fell into a state of shock. She had never experienced anything like this and did not know what to do. Fearful that she would burst into tears and humiliate herself (which she knew was what Jones wanted),

Abel dissociated. Knowing she had not done anything wrong and desperate to get out of there, Abel signed the documents without digesting their contents.

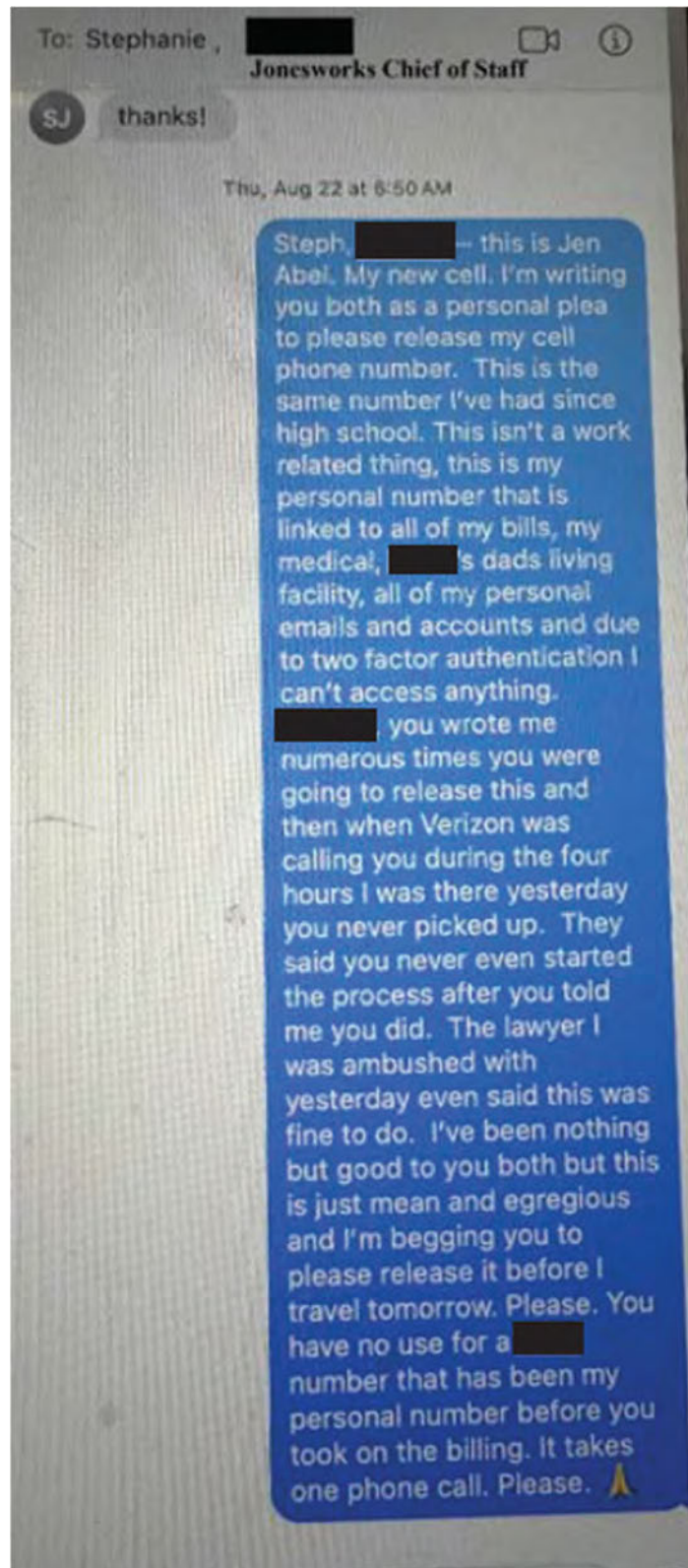
219. Afterward, the lawyer demanded that Abel hand over her personal laptop. Abel complied, and the IT professional conducted a search that turned up nothing. The attorney then presented Abel with a list of approximately 10 documents and accused Abel of having accessed and stolen them. Abel denied having done so, and the IT specialist conducted a further search of her laptop, which again turned up nothing. The attorney then instructed Abel to hand over her phone, after which security would escort her out of the building.

220. Still utterly shell-shocked and desperate to get out of there, Abel agreed to hand over her phone so long as they would confirm that Jonesworks would immediately release her personal cell phone number, which would enable Jonesworks to take possession of the physical device without gaining unrestrained access to its contents. It would also allow Abel to get a new phone and move on with her life without undue disruption. After express confirmation from the Jonesworks chief of staff and attorney, Abel handed them the phone and was ushered out of the building as her colleagues watched in disbelief. Seeing that Abel had been stripped of her phone (and therefore had no way to contact anyone), some reached out to Abel's partner, family, friends, and former co-workers to let them know what had happened.

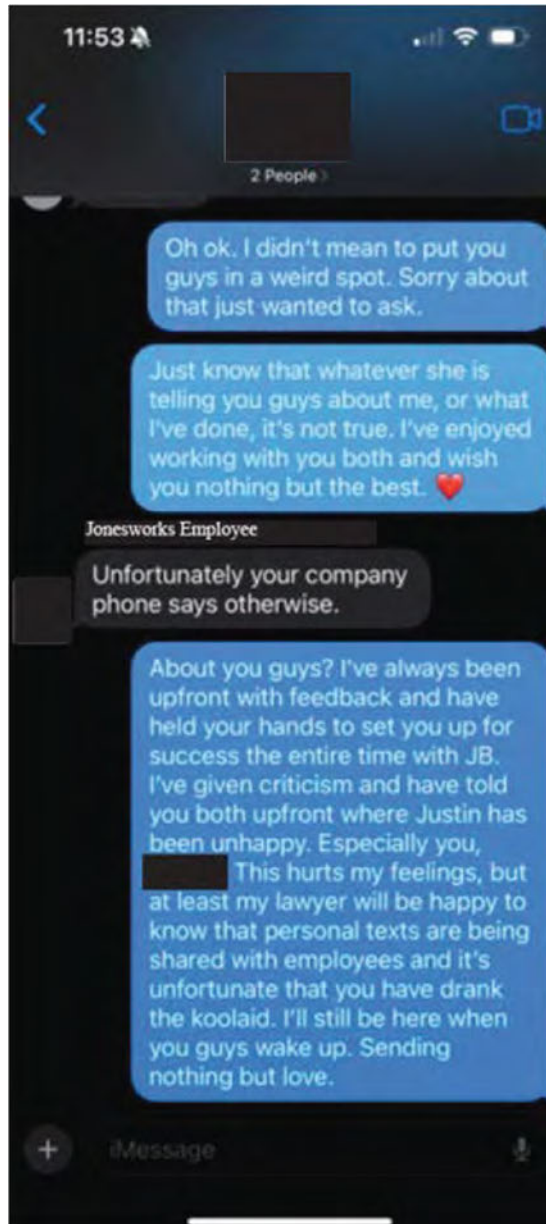
221. Abel went straight to a Verizon store a short distance away. Once there, Verizon contacted Jonesworks to coordinate the release and transfer. The Jonesworks chief of staff assured Abel and Verizon that they were in the process of effectuating the release and to bear with them for a few minutes. Abel never heard from him again. After four hours of desperate (unanswered) calls, Abel left Verizon in panic and despair. Abel realized Jones had double-crossed her—in a very serious way. By refusing to release Abel's phone number, Jonesworks had usurped her



contact information and cut off Abel's access to critical accounts protected by two-factor authentication linked to that phone number. As a result, Abel lost access to her iCloud (including all her text messages, photos, and contacts), bank accounts, utilities, insurance, and virtually every other sensitive account. By contrast, Jones now had unrestricted access to everything stored on Abel's phone—her text messages, emails, personal photos. Jones could read her communications with her fiancé, parents, friends—everyone. Jones was acting purely out of spite.



222. It took Abel over a month to regain control over all her accounts. Meanwhile, she learned that Jones had been sharing her private text messages with the entire office, mocking and disparaging her. Having torched Abel's privacy and dignity, Jones started boasting that Abel's business was next. In or around early September 2024, Jones warned a departing employee not to work for Abel because "her business wouldn't be around much longer."



**J. Stephanie Jones Falls Out with Wayfarer and Baldoni**

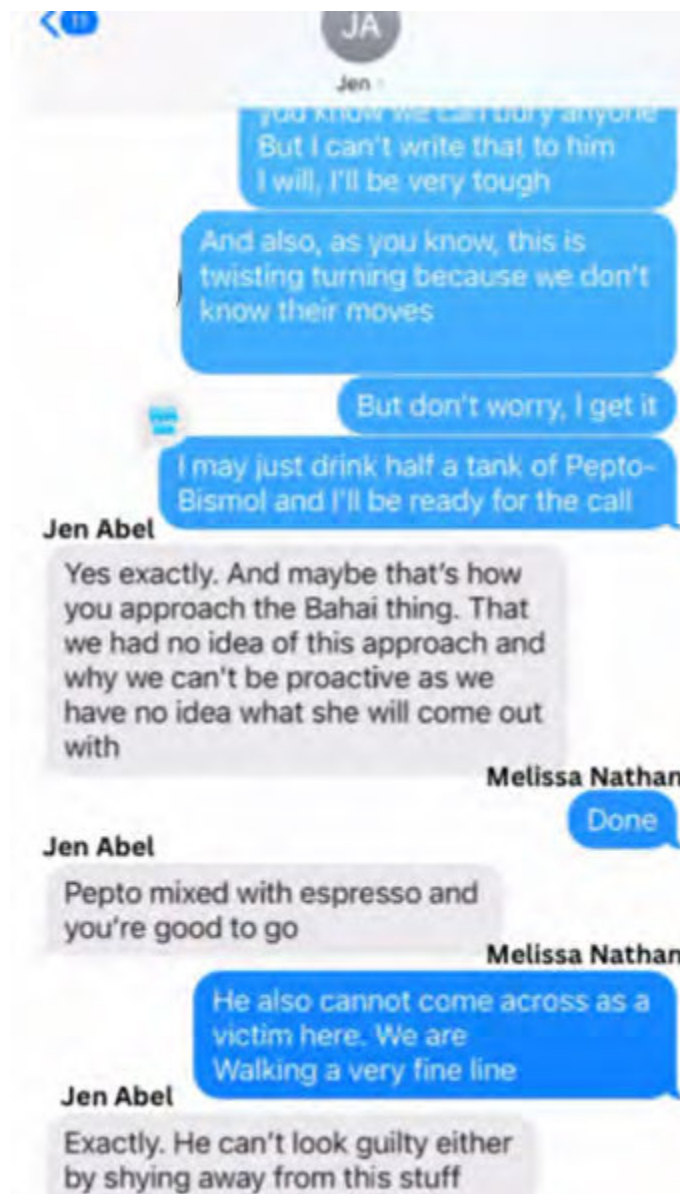
223. By then, Jones also had an axe to grind with Wayfarer.

224. For the entirety of Wayfarer's four-year engagement with Jonesworks, Abel was the point person on the account. Jones was more concerned with "prestige" clients like Tom Brady and devoted little to Wayfarer or Baldoni.

225. But Jonesworks was in utter turmoil by July 2024. Already bleeding clients and personnel, Jones learned that Business Insider was working on an unflattering story about her set to be published sometime in August. Her reputation had already been severely damaged by the "Stephanie Jones Leaks" website and social media accounts. Jones was desperate to keep her remaining clients. Given Abel's close relationship with Wayfarer and Baldoni, Jones was undoubtedly concerned they would leave Jonesworks alongside her. And she wanted to make sure that did not happen.

226. At the time, Wayfarer and Baldoni were in the midst of a massive PR crisis, as news stories began to trickle out concerning tension between Lively and Baldoni just as the Film was about to premiere. Jones started participating in meetings, calls, and written correspondence to reassert her authority over the account and convey her engagement to Wayfarer.

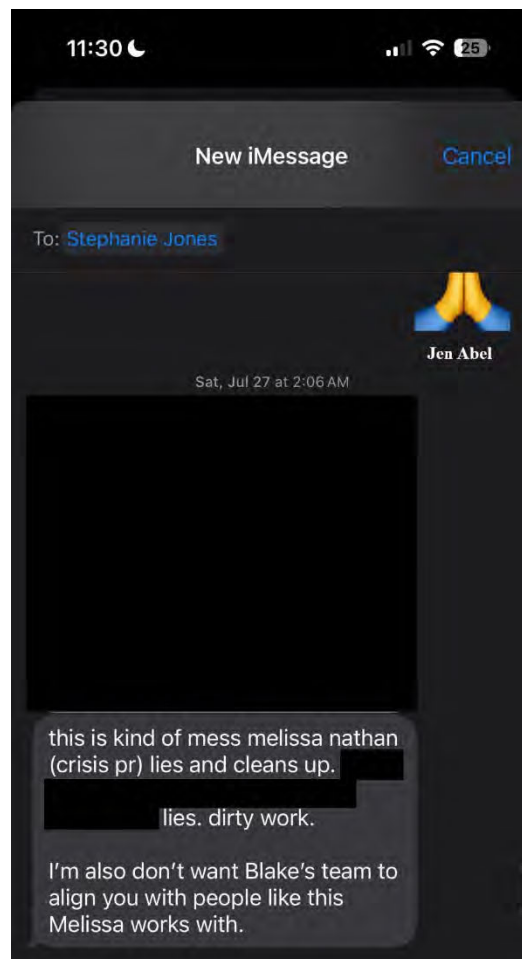
227. Abel recommended that Wayfarer engage a crisis PR specialist, Melissa Nathan, to assist in navigating these choppy waters. The need for crisis PR expertise was particularly acute due to Lively's demand that Baldoni not be permitted to attend the premiere. In addition, Abel learned from Nathan that, per her media contacts, a negative story was being "shopped" around to multiple outlets, positioning Baldoni's religion as a "cult" and accusing Baldoni of having "fat shamed" Lively.



228. When Jones learned that Wayfarer was considering retaining Nathan, she was furious. Jones viewed Nathan as a competitor and conveyed to Abel that her recommendation to



Wayfarer was a betrayal of trust. Jones then sought to derail the plan, badmouthing Nathan and disclosing client confidences from past collaborations between Jonesworks and Nathan.



While Heath acknowledged Jones' position, he told her Wayfarer would make its own decision after meeting Nathan.

229. So Jones inserted herself into the mix in early August 2024, seeking to box out Nathan and Abel. The problem, however, was that Jones had chosen not to be privy to Wayfarer leadership's communications strategy or internal decision-making, having long claimed to be too busy with higher profile clients. Wayfarer was fine with Jones' disengagement, as Abel was their trusted advisor, and they had no interest in being a pawn in Jonesworks office politics. In addition,

Jones had chosen to take a lengthy vacation in Europe during this critical period of the press campaign and premiere of the Film. Even from afar, Jones' efforts were ham-fisted, unwelcome, and sporadic given her distance from Wayfarer's day-to-day business. As Jones tried to stir up drama and undermine Abel's authority, Wayfarer and Baldoni were focused solely on managing the crisis in front of them.

230. At the time, Lively's and Baldoni's teams had negotiated an uneasy truce in which neither side would participate in negative coverage of the other. Lively's team had already broken that truce, but the Wayfarer team did not know that then. As far as they were concerned, it was best for Baldoni, Lively, and the Film if both sides agreed to keep the peace, though Wayfarer's team had to date been acting only in defense in responding to press inquiries.

231. But on August 8, 2024, Jones, in another desperate attempt to re-insert herself, contacted a Daily Mail reporter about a story they had published about Baldoni and Lively. She did so in direct violation of Abel's instruction not to talk to the press given the truce with Lively's team. Nonetheless, Jones bragged to Wayfarer about "trading calls" with the Daily Mail in an effort to appear engaged on the account. Nathan and Abel were left to deal with the fallout.

Stephanie Jones [REDACTED] Thu, Aug 8, 2024 at 8:50 AM  
To: [REDACTED] Jamey Heath [REDACTED], Justin Baldoni  
Cc: WayfarerStudios [REDACTED]

Left word for [REDACTED]. She's been very nice in past so will get this fixed.

Stephanie Jones  
[www.jonesworks.com](http://www.jonesworks.com)

Begin forwarded message:

From: [REDACTED]  
Date: August 8, 2024 at 4:16:37 PM GMT+1  
To: Jennifer Abel [REDACTED], Stephanie Jones [REDACTED]  
WayfarerStudios [REDACTED]  
Subject: Call for comment

Hi, I'm a reporter for DailyMail.com and I'm currently working on a story surrounding the recent rumors that there was a feud between It Ends With Us costars Blake Lively and Justin Baldoni.

People on social media are talking about how they didn't pose together at the premiere or do any press together.

I wanted to give you a chance to respond to these rumors. Please let me know if you have any comments. Thank you.

Best,

[REDACTED]

DailyMail.com

[REDACTED]  
London | New York | Los Angeles | Sydney

Re: Call for comment

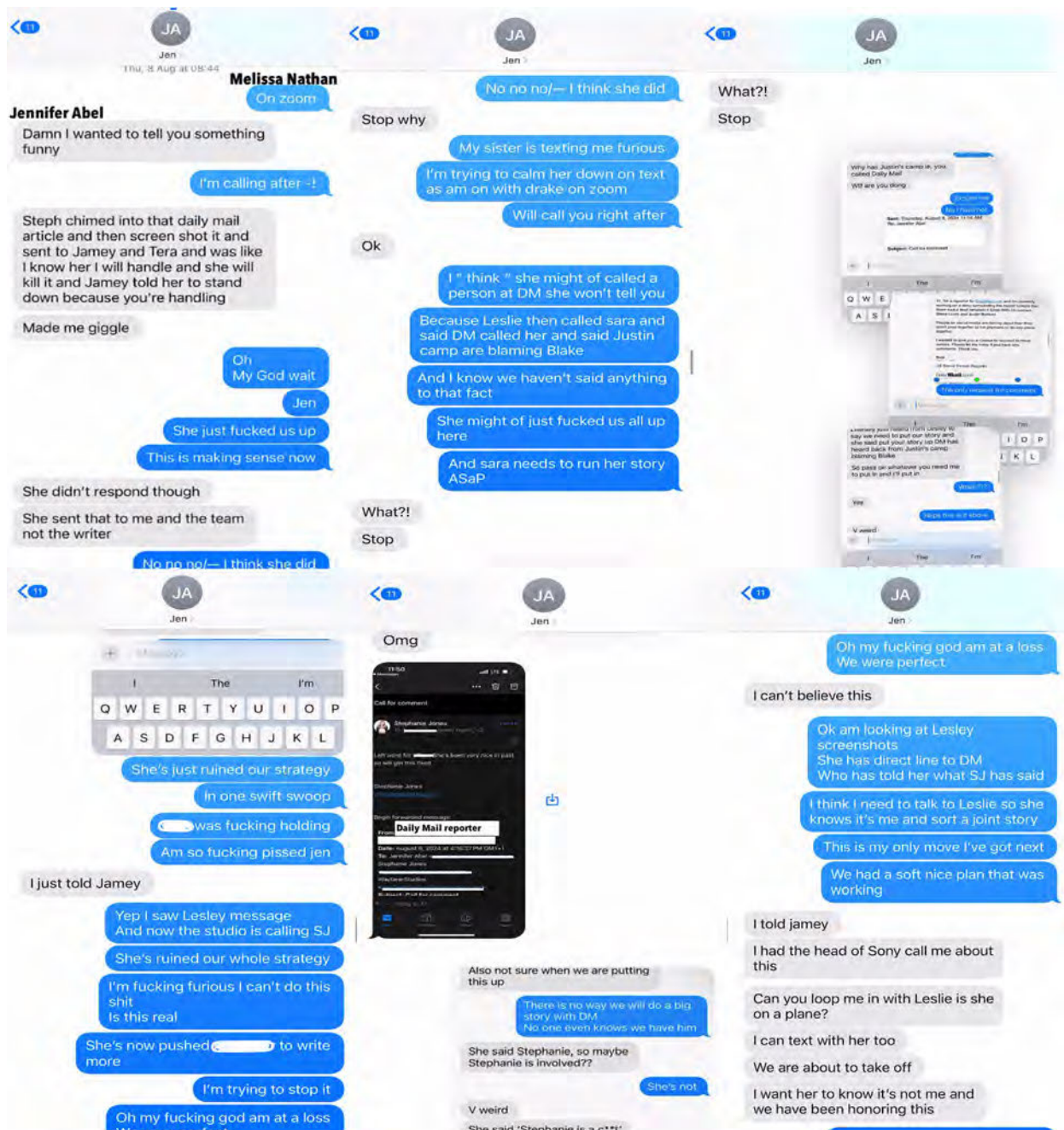
 Stephanie Jones 10:29 AM  
To You and WayfarerStudios

[REDACTED] has been nice and fixed things for us in past. I can give her a call that this is nothing burger.

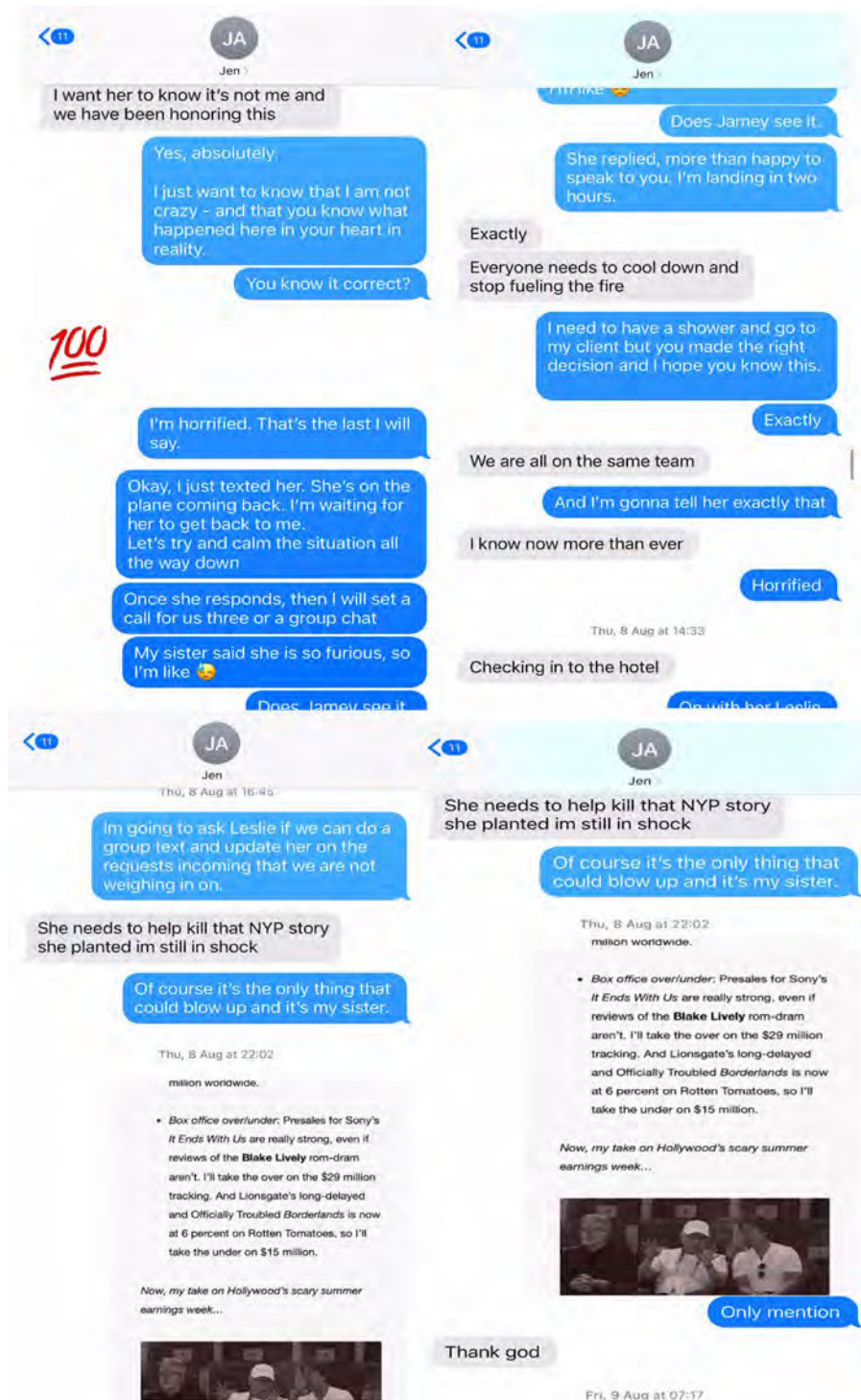
Stephanie Jones  
[www.jonesworks.com](http://www.jonesworks.com)

On Aug 8, 2024, at 4:18 PM, Jennifer Abel wrote:

Team pls ignore thx :) x





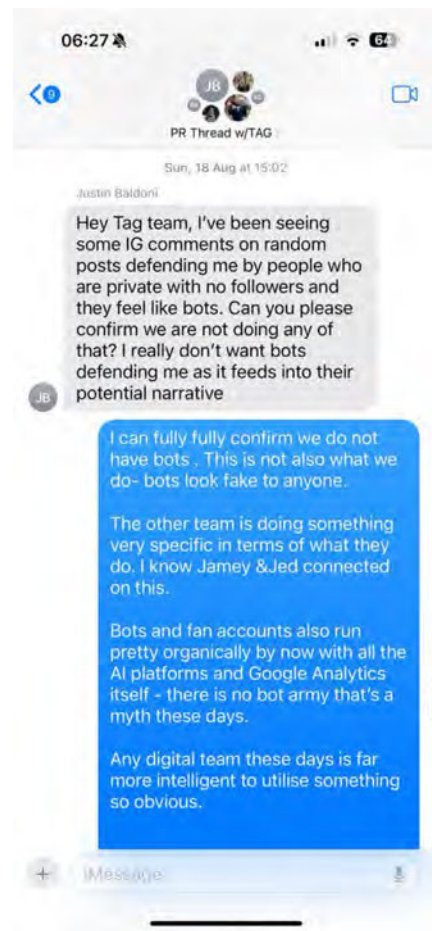
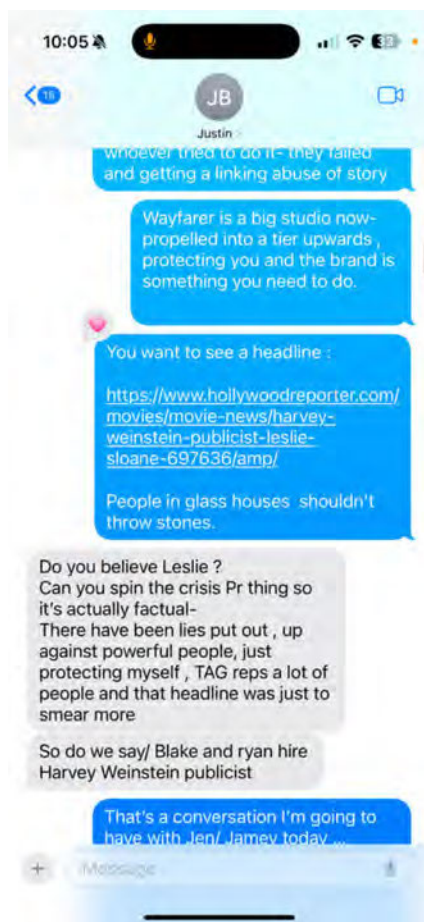


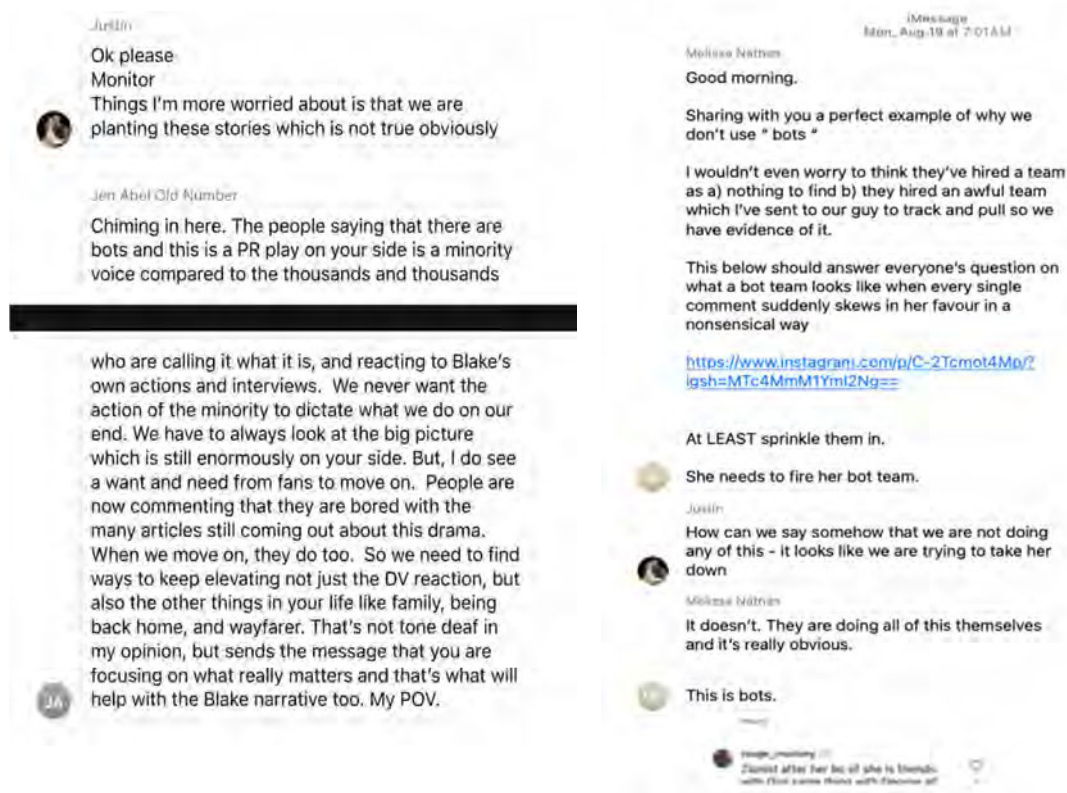
232. This blatant disregard of Wayfarer’s strategy sparked a chain of unfortunate developments. Sloane and Sony learned that “someone from Baldoni’s team had been



communicating negatively to media.” It was clearly Jones, and Wayfarer’s leadership was livid. As was Sony. All parties were desperate to prevent an all-out slugfest between Lively and Baldoni just as the Film was about to be released to the world. With her reckless and unauthorized activities, Jones had made that scenario much more likely. In response, Wayfarer instructed Jones to cease all activities on behalf of Wayfarer and Baldoni for the time being and to let Abel and another Los Angeles-based Jonesworks employee, Matthew Mitchell, handle the crisis alongside Nathan.

233. At this time, Nathan started hearing from other journalists that Sloane was planting negative stories about Baldoni and was under the impression that Baldoni’s camp had broken the truce. Anxious Sony executives began reaching out to Wayfarer seeking clarity.

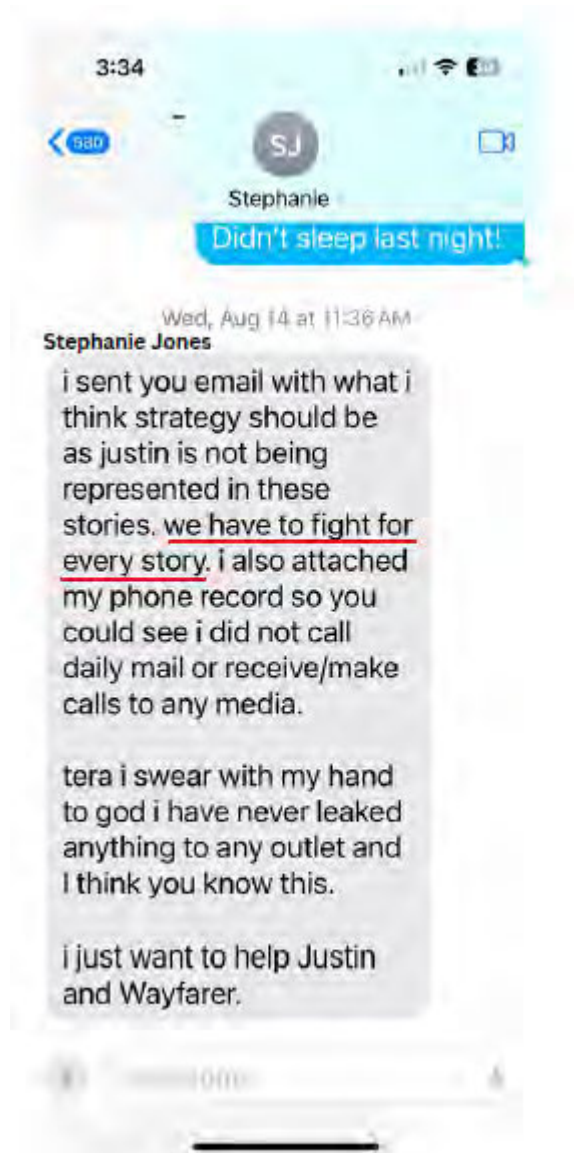




234. Yet Jones, panicked about being blamed, refused to be sidelined, insisting that she *needed* to contact Sony's and Lively's PR teams to clarify that she had not planted any negative stories about Lively. Heath told her not to do that, to which Jones responded that she could do "whatever she wants" to clear her name and that Wayfarer cannot stop her from making calls. Desperate to salvage her reputation with Lively and Sony, Jones emailed a number of key Sony executives working on the Film to declare that she was in Europe with "her husband, partner at WME Jason Hodes" and placing all blame on "her team." In her attempt to save face, Jones ruptured her relationship with Wayfarer and Baldoni.

235. Although Jones ultimately agreed to stand down, Wayfarer and Baldoni had lost all trust in her. After parachuting in for self-interested reasons, nearly blowing up the truce with Lively's team, and lashing out when told to stop, Jones became a magnet for drama when it was least needed.

236. But Jones was not ready to throw in the towel. Ironically, given her later attempt to fabricate a “smear campaign” narrative, it was Jones—not Wayfarer, Baldoni, Abel, or Nathan—who started advocating for a more aggressive public relations strategy.



237. On or about August 14, 2024, Jones sent an email to Heath further elaborating on her “recommended strategy”:

**\*\*Flood the Zone with Positives\*\*:** We need to ensure that we promote positive narratives that media outlets cannot ignore. Currently, most stories are heavily biased towards Blake’s perspective, leaving Justin unrepresented. It’s crucial that we fight for every inch of every story, which requires far more effort

than typical crisis PR want to put forth in our experience working with specialized crisis teams.

**\*\*Prepare Alternate Stories\*\***: We should mobilize a robust network of supporters and third-party advocates ready to counter these narratives on deep background as well as some on the record, making it clear that the claims being made are untrue and unfounded.



She doubled down in an email on August 21, 2024, threatening that Wayfarer and Baldoni had an “EXCLUSIVE contract . . . through May 2025”:



From: Stephanie Jones [REDACTED]  
Date: August 21, 2024 at 4:18:33 PM EDT  
To: Jamey Heath [REDACTED]  
Cc: [REDACTED]

Subject: Jamey's text to Jonesworks

Hi Jamey,

Justin, Wayfarer, you, Tera and team are extremely important to us. I received your text a little over an hour ago, but I'm currently unable to make calls on my cell at my current location. I'm so sorry!

[REDACTED] one of our SVPs whom you have cited has been one of your day-to-day senior executives on your account, said he just spoke with you and nothing was urgent. It was about the announcement for the new book adaptation. We're working on placing it on the heels of IEWU.

Your below email is inaccurate. As you know, I have been deeply involved in strategy, planning, account management and high level PR and media comms as well as crisis until you asked me to stop communicating on behalf of Justin and Wayfarer on 8/9/24 and allow only Jennifer, Matthew and team to handle. I've been on set during shoots and have had numerous calls weekly with my team and yours as well as many with Justin, particularly regarding Blake, often at 11pm, 1am ET (New York). My commitment spans not only the past eight years but also the last four since you joined.

This has never been one person but rather it has been a true team effort, with my full support alongside a dedicated team at Jonesworks, including a senior vice president, two senior publicists, several account executives and account coordinators working tirelessly for Justin and Wayfarer.

On August 9, 2024, you indicated that you wanted only Jennifer Abel and [REDACTED] and team to communicate on behalf of Justin and Wayfarer. It's my understanding that [REDACTED] was retained and began communicating with teams just four days later on August 13, 2024, which demonstrates that I wouldn't have been stepping in "mid-trial."

I have spoken to [REDACTED] and I also attempted to reach [REDACTED] yesterday about a magazine cover for Justin that I have been working on for the last year now. As I noted below, I have

also made many attempts to contact you through email and phone, but I have not received any responses.

We have an EXCLUSIVE contract with you through May 2025. You contracted a crisis PR firm to handle all crisis-related matters. If you would now like us to help with that we absolutely can and will. Please let me know.

And please know that our team at Jonesworks is well-equipped to manage everything as we always have without missing a beat.

Thank you,  
Stephanie

Stephanie Jones  
[www.jonesworks.com](http://www.jonesworks.com)



238. Notably, on the same day, August 21, 2024, just *hours* after Abel’s phone was seized, Leslie Sloane called Melissa Nathan. During that call, Sloane told Nathan that Sloane had seen Nathan’s text messages (which could only have come from Abel’s phone) and that Nathan should expect to be sued.

239. As September drew near, Wayfarer and Baldoni—with the assistance of Abel and Nathan—continued their tireless efforts to promote the Film, put out fires, and see the project through to the finish line. Stewing in jealousy towards Abel and resentment towards Wayfarer/Baldoni, Jones clearly saw the writing on the wall. Knowing she would soon be terminated, Jones started taking steps transparently intended to make it harder to cut her loose. Those steps included sending email after unwelcome email to Heath and others—long after their relationship had irrevocably ruptured—to lay the groundwork to contest that she had been detached and nonresponsive for years. This was especially galling, as Jones had been in Europe and largely incommunicado—save for her disastrous efforts at self-preservation—for weeks during the critical month of August when the Film premiered.

240. For Wayfarer and Baldoni, the decision was straightforward. As soon as Abel was out at Jonesworks, Wayfarer was out too. This was not about Abel “poaching” Wayfarer or Baldoni. Nor was it part of a premeditated plan to cut out Jonesworks. But Abel was a trusted, loyal, and committed member of the team. Wherever she went, Wayfarer and Baldoni would follow. On the other hand, Jones was a walking disaster whose self-absorption, disloyalty, and insubordination had been a significant headache.

241. Rather than accepting the end of the relationship with professionalism and decorum, Jones started threatening to sue, demanding exorbitant payment for work not done, and

protesting that she had done an amazing job. But Wayfarer and Baldoni had already made the decision to part ways with Jonesworks, and their decision was final.

242. For Jones, stewing in indignity and resentment, the loss of yet another client—to Abel, no less—was a sting too great to bear. And so she chose to take revenge on all of them.

243. Recall that Jones had taken possession of Abel’s personal phone, including all of her text messages, emails, personal photos, and so forth. Having chosen a path of no return, she could now exploit them to great effect, pouring gasoline over the heads of her former clients and longtime former deputy and lighting a match.

244. On information and belief, Jones approached Lively’s team with an appealing offer: ammunition sufficient to destroy Baldoni, Wayfarer, and Abel in one fell swoop. Wielding reams of Abel’s private communications—which could readily be sliced and diced to construct a false narrative—Jones had quite the pitch for an embattled Lively and her team. Knowing that Lively was convinced (wrongly) that Baldoni—and not her off-putting public appearances and cynical self-promotion—had been responsible for the rash of negative publicity directed towards her, Jones correctly assumed that she would find willing conspirators in the Lively camp.

245. In turning over these materials to Lively, Jones knew full well that the blowback would also engulf Wayfarer and Baldoni. And that was the point. Revenge.

246. Her plan worked like a charm, at least for a time. Working hand-in-glove with the *New York Times*, Lively concocted a fantastical narrative that laid the blame for her travails exactly where she believed it belonged—with others.

247. The ramifications of this scheme have been grave for Wayfarer, Baldoni, Abel, and Nathan, who became objects of public scorn and derision overnight. Abel and Nathan, two private individuals (and female small business owners), have had their lives turned upside down: Their

careers and reputations have been destroyed, their private information leaked, and their email inboxes and social media pages filled with a daily stream of death threats, abuse, and vile antisemitic remarks. The backlash against Wayfarer and Baldoni has been equally devastating, with Baldoni wrongfully labeled as a sex pest, his accolades rescinded, and his future projects thrown into doubt.

248. And Jones still has all of Abel's private photos and text messages, which Abel has every reason to believe will find their way online via Jones; some already have. She lives in fear of what Jones has in store for her and for what other client confidences Jones is willing to divulge in her fit of pique at Abel. All of this because Abel dared to leave Jonesworks and start her own business.

249. The results have been a calamity for everyone roped into Lively's and Jones' campaign of destruction.

**K. Lively and Reynolds Threaten the Wayfarer Parties Unless They Take the Fall**

250. On August 12, 2024, Heath and Abel had a call with two executives from their then talent agency. One admitted that the root of Lively's problems was focusing the promotion of the Film on frivolities like fabulous premiere dresses, Hollywood glamour, and the commercial benefits for Lively's brands, while Baldoni had always maintained his public focus on amplifying the voices of domestic violence survivors. The executive communicated the demand from Lively and Reynolds that Wayfarer, Heath and Baldoni make a public apology *that day* and that, if they failed to do so, the "gloves would come off." Stunningly, the executive even told Heath and Abel that Lively and Reynolds objected when Baldoni spoke *kindly* of Lively in public, claiming that it misrepresented their relationship.

251. The talent agency executive told Heath and Abel that Lively believed Wayfarer, Baldoni and Heath were waging a shadow campaign against her. Abel quickly disabused the executives of that notion, conveying her belief that she and Sloane had reached a kind of truce, while Nathan had not come on the team or taken a proactive role until they started getting press requests.

252. The second executive admitted on the call that “*no one pushes back*” on Lively and Reynolds.

253. The next day, on August 13, 2024, Abel and Heath had another call with talent agency executives. During this call, one executive told Heath that the agency had spoken to Lively and Reynolds by phone about the overwhelming tide of negative publicity that they had faced over the past days. Heath clarified that Wayfarer, Baldoni and Heath had no connection to the negative publicity, but they told Heath that Lively and Reynolds had demanded that Wayfarer put out a statement “accepting blame” for the problems during filming, with an express threat that they themselves would attack Wayfarer in the press if Wayfarer refused.

254. The executives told Heath and Abel that Reynolds and Lively dictated a statement that they required Wayfarer to put out, calling *It Ends With Us* a “troubled” production and forcing Wayfarer to take “accountability” for the problems in the production. Wayfarer, Baldoni, and Heath would have to acknowledge and own their “mistakes” and “own” all negativity being aimed at Reynolds and Lively.

255. Abel and Heath asked that the executives clarify what exactly Wayfarer, Baldoni and Heath were being asked to “take accountability” for. They admitted that Lively and Reynolds were simply upset by how social media had turned against them. Stunningly, *the executive admitted that Lively and Reynolds brought the backlash on themselves*, but that they were beyond

reasoning with. He admitted that making constant threats was Lively and Reynolds' well-known *modus operandi* and that their demands were not based on reality, but on finding someone to blame for their social media crisis besides themselves.

**L. Lively Plays the Final Card in Her Hand: False Accusations of a Smear Campaign, Deployed in the *New York Times***

256. When the Wayfarer Parties refused to take the fall for Lively's disastrous promotional campaign, Lively was true to her word: The gloves came off.

257. At 9:46 p.m. (EST) on Friday, December 20, 2024, NYT reporter Megan Twohey ("Twohey") requested the Wayfarer Parties' response to an imminent 4,000-word bombshell story concerning their alleged orchestration of a smear campaign targeting Lively, purportedly in response to Lively's disclosure of concerns about the working environment on the set of the Film.

258. The Wayfarer Parties were asked to provide "on-the-record comment" and to notify the Times of any "inaccuracies" by noon (EST) the next day, on December 21, 2024—a mere 14 hours overnight. the Wayfarer Parties' representative promptly denied Lively's accusations as reported by the Times and criticized both Lively and the Times' reliance on "cherry-picked" and altered communications stripped of necessary context and deliberately spliced to mislead.

259. Despite its claim to have "reviewed these along with other documents[,] the Times relied almost entirely on Lively's unverified and self-serving narrative, lifting it nearly verbatim while disregarding an abundance of evidence that contradicted her claims and exposed her true motives. But the Times did not care. Given the breadth of the Article and the coordinated "drop," it has long been readily apparent that the Times had been quietly working in concert with Lively's team for weeks or months, a fact that has now been confirmed.



260. Upon information and belief, the Times participated actively in the legal maneuvering at the heart of Lively’s strategy, and all of the Lively Parties worked closely together on a scheme to defame the Wayfarer Parties by maliciously and recklessly publishing false and damaging information about them.

261. Months after the Film’s premiere, on December 21, 2024, a bombshell article dropped in the *New York Times*. Authored in part by Twohey, who gained prominence for her exposé of Harvey Weinstein, the article’s headline promised a glimpse “Inside a Hollywood Smear Machine” (the “Article”). Notably, without even waiting for their response deadline of noon (EST) on December 21, 2024, the Times rushed to publish its inflammatory article, “‘We Can Bury Anyone’: Inside a Hollywood Smear Machine,” at 10:11 a.m.—nearly two hours early. This brazen disregard for journalistic integrity and fairness resulted in an article rife with inaccuracies, misrepresentations, and omissions.

The New York Times

## ***‘We Can Bury Anyone’: Inside a Hollywood Smear Machine***

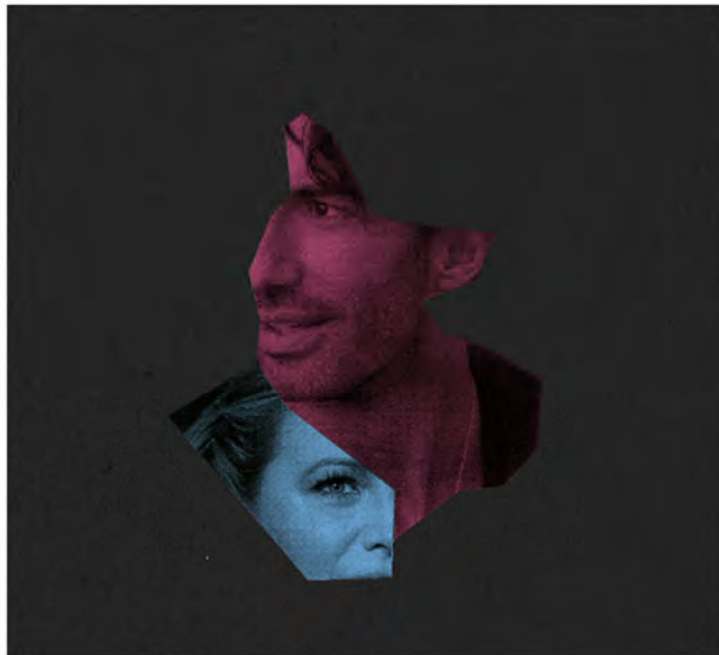
Private messages detail an alleged campaign to tarnish Blake Lively after she accused Justin Baldoni of misconduct on the set of “It Ends With Us.”

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920



Najeebah Al-Ghadban

By [Megan Twohey](#), [Mike McIntire](#) and [Julie Tate](#)

Published Dec. 21, 2024 Updated Dec. 22, 2024

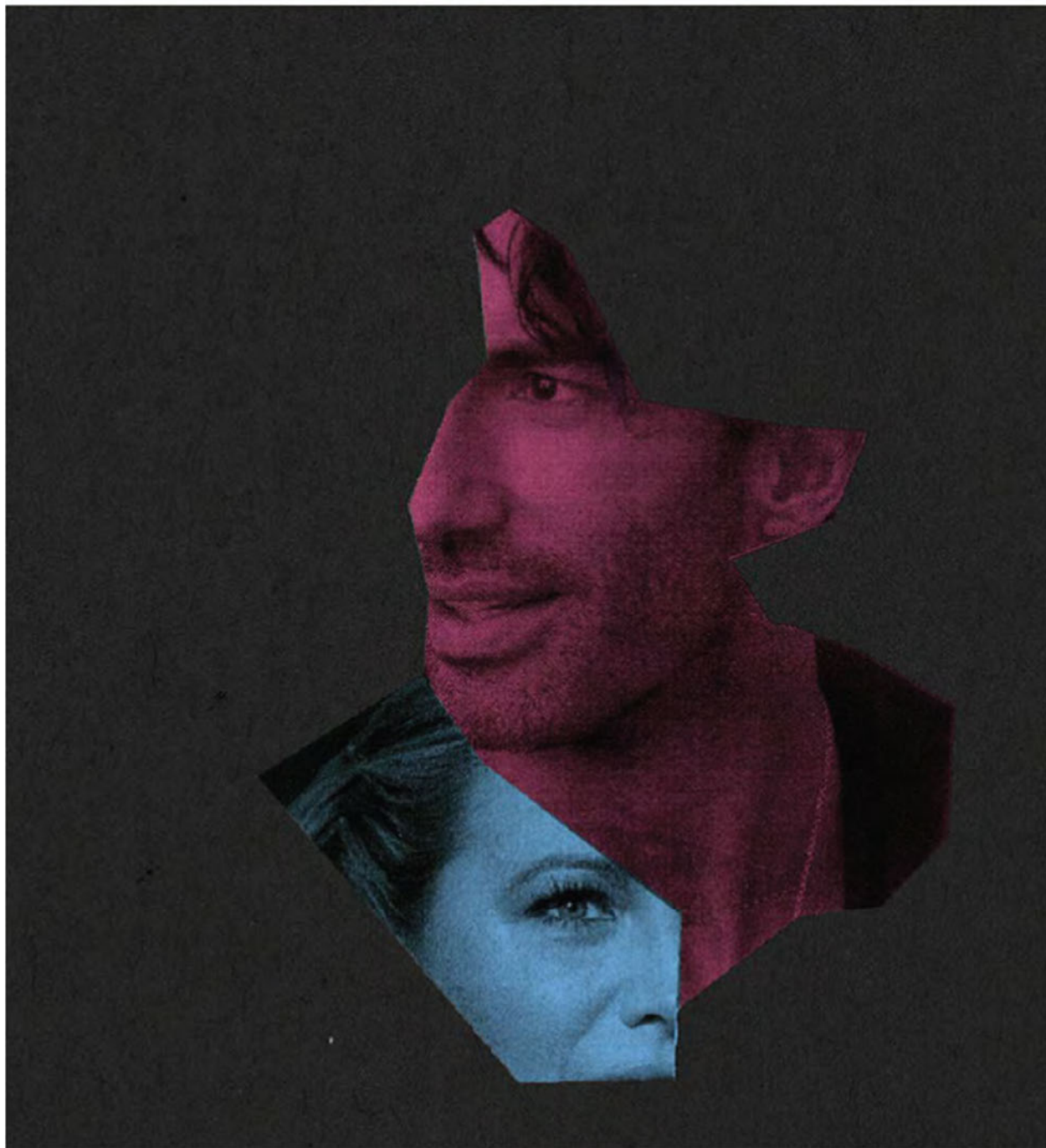
[Leer en español](#)

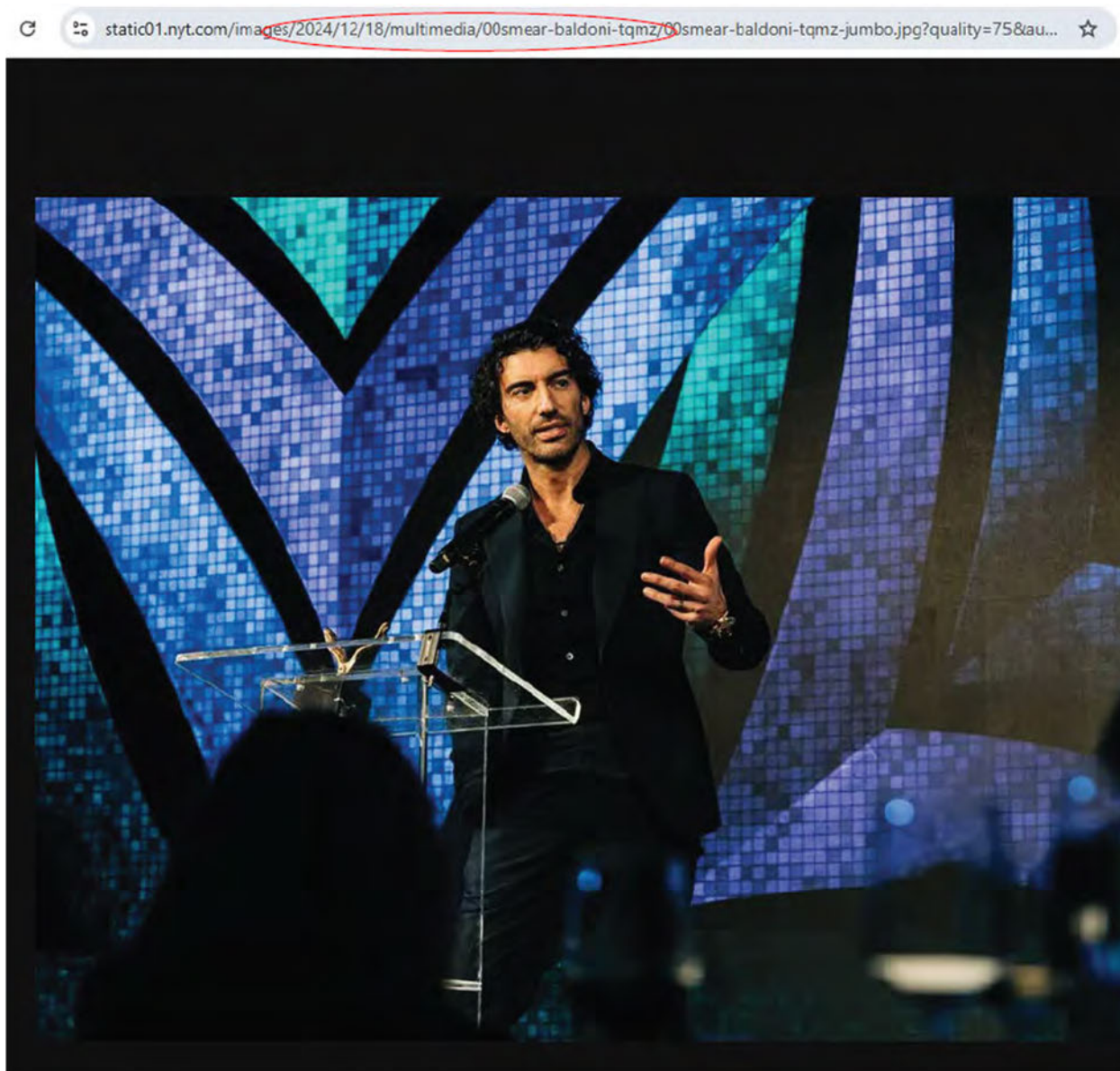
262. The Article purported to provide a detailed account of a calculated campaign to bring down Lively in retaliation for daring to speak out against sexual harassment on the set of *It Ends With Us*. The Article draws heavily from the California Civil Rights Department complaint that was filed by Lively the day before. The CRD Complaint and the Article are both purportedly based on “thousands of pages of text messages and emails that [Lively] obtained through a subpoena.” The Article notes, “These and other documents were reviewed by the New York Times.”

263. The four-thousand-plus words of the *New York Times* article dropped less than a day after Lively apparently filed her CRD Complaint. The close coordination between Lively's team and the *New York Times*, likely over a matter of months before the CRD Complaint was filed, is plain—and has now been proven beyond doubt thanks to Internet sleuths from around the world.

264. Upon information and belief, the New York Times loads images and other data files for its website using a file naming convention that indicates the date that the data file in question was created or loaded onto the website. As members of the public soon discovered, the URLs for various images in the Article point to dates as early as December 16, 2024.

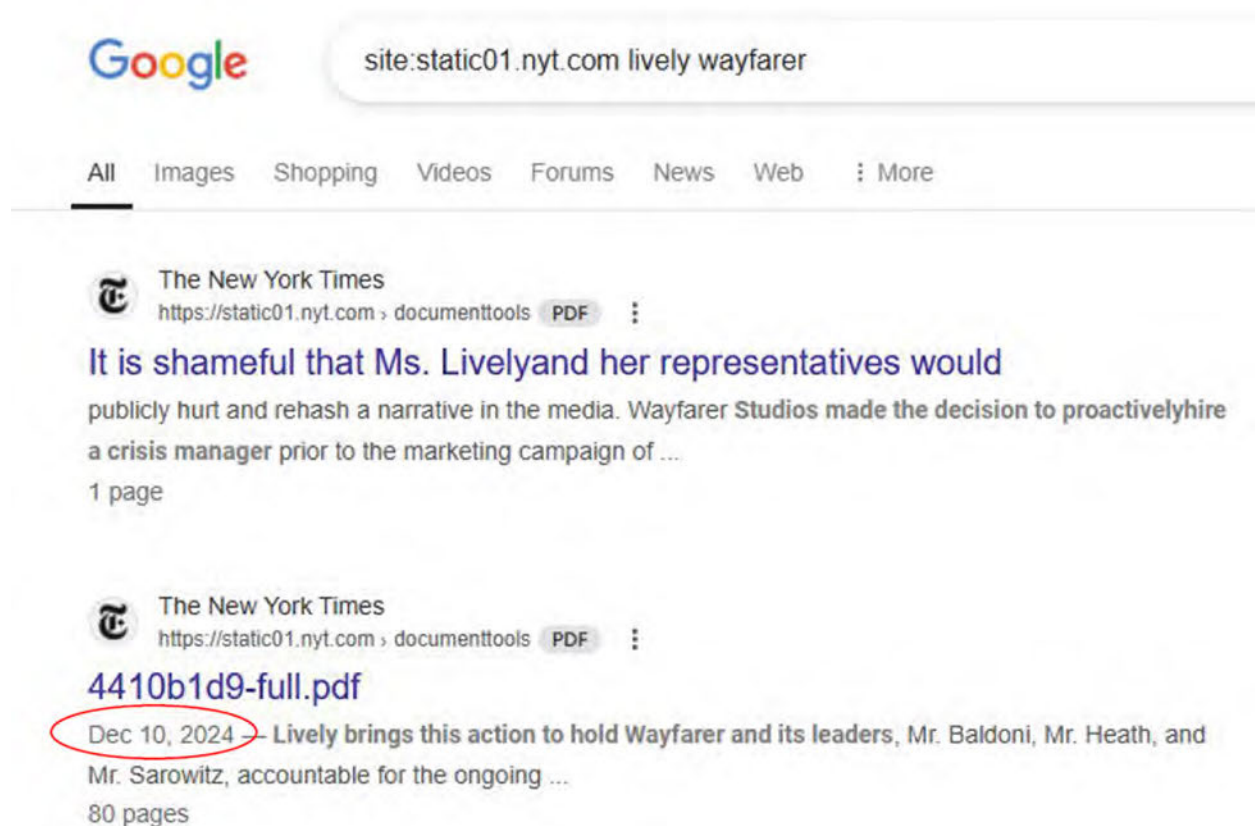
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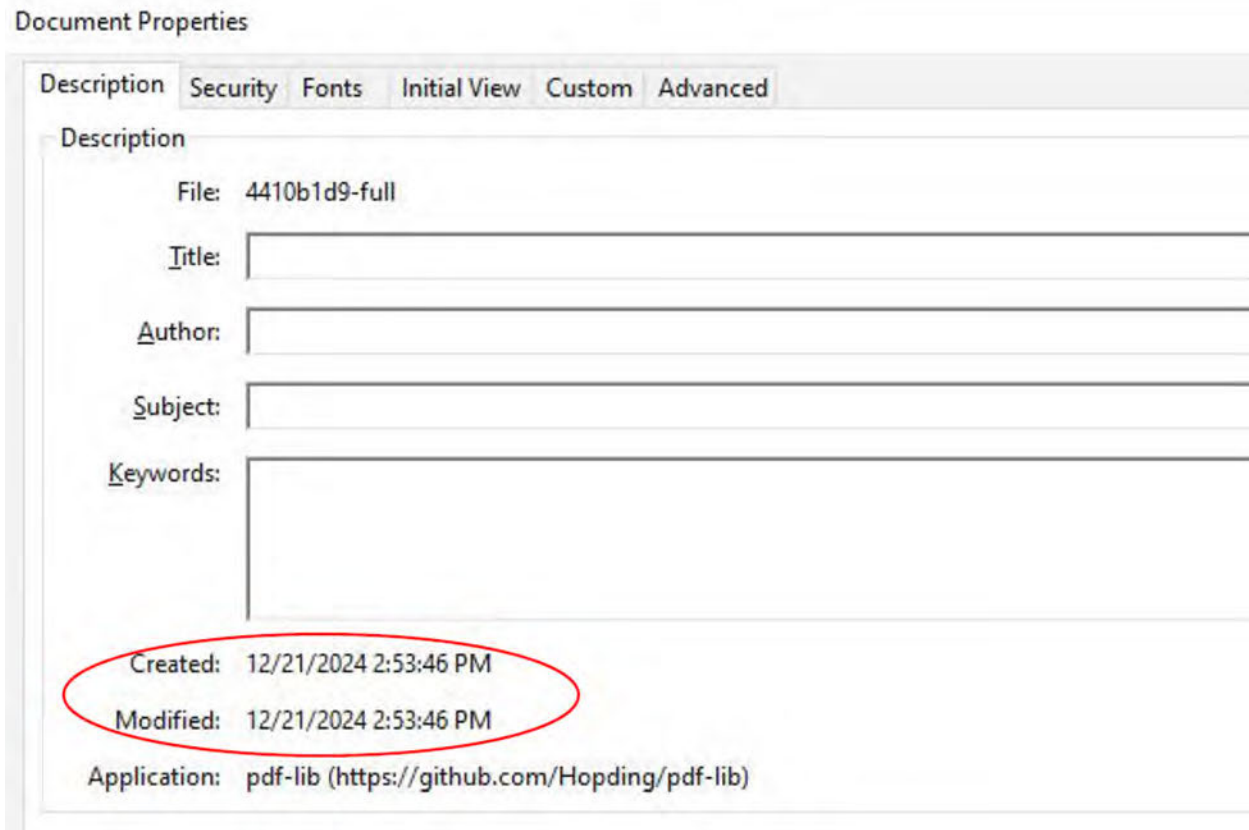


265. As other members of the public pointed out, web crawler data appears to indicate that the PDF of the CRD Complaint linked within the Article was uploaded to Times servers even earlier. Specifically, using a search engine to search for the CRD Complaint within the Times' static document repository (where the CRD Complaint is stored and referenced by a link in the Article) shows that a web crawler (a program that scours the Internet to locate and catalog websites and files) recorded the CRD Complaint PDF as having been uploaded as early as December 10, 2024.





Interestingly, the PDF file itself appears to have been created no earlier than December 21, 2024, at least according to the file's properties.

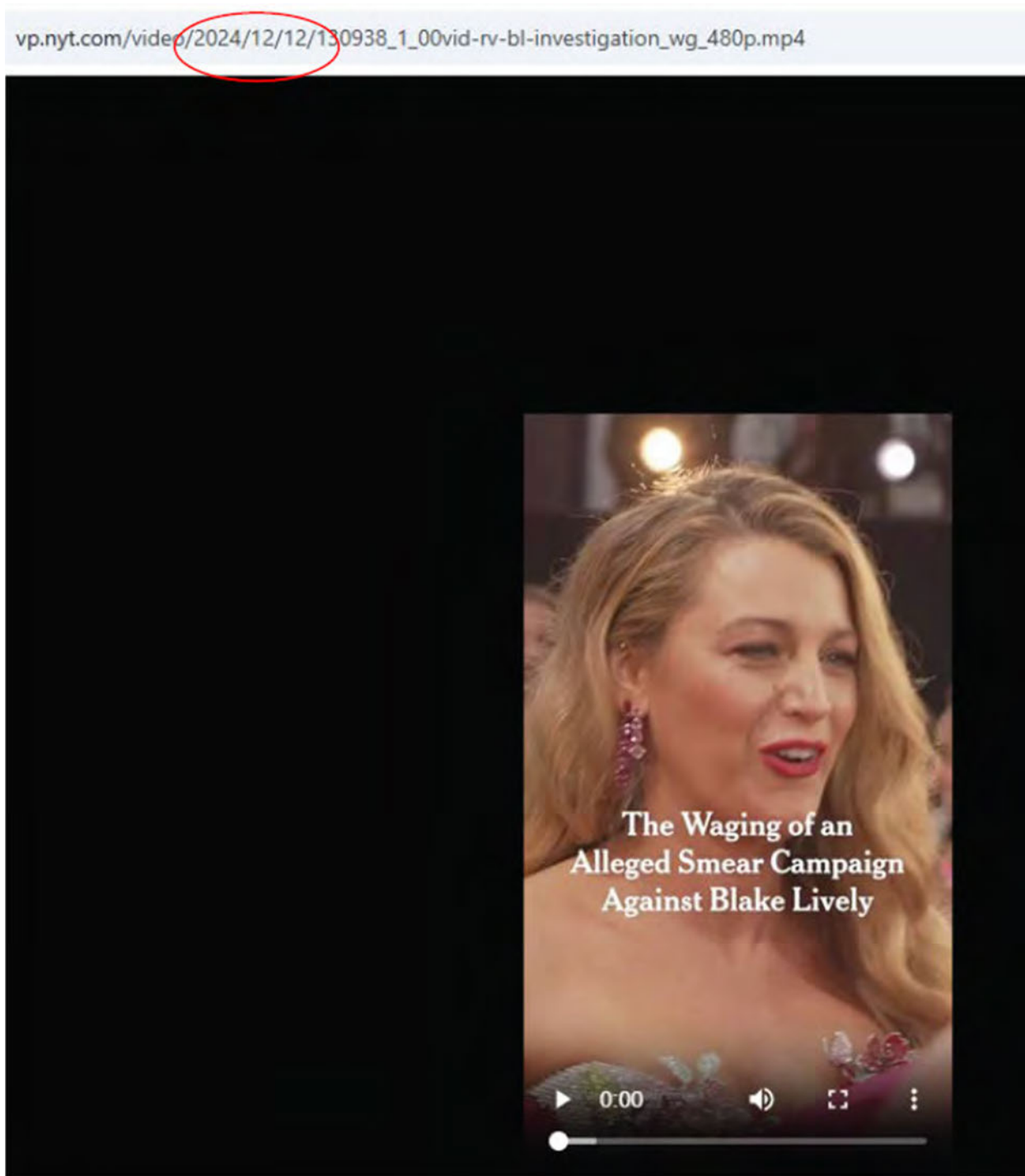


However, as various online commentators have noted, this may indicate that a web crawler catalogued an earlier-created version of the document that was then replaced with a new version that was identical except for the creation and modification dates, causing the web crawler to view it as the same document. In other words, one plausible explanation for the mismatch between the web crawler's date and the file's created/modified dates is that the New York Times re-uploaded the CRD Complaint at the last minute specifically to cover up the fact that they had been colluding with Lively and the other Lively Parties for weeks.

266. The New York Times also uploaded a video to accompany the Article, in which Twohey breathlessly reports the easily and thoroughly disproven “smear campaign” narrative as “what really happened”:



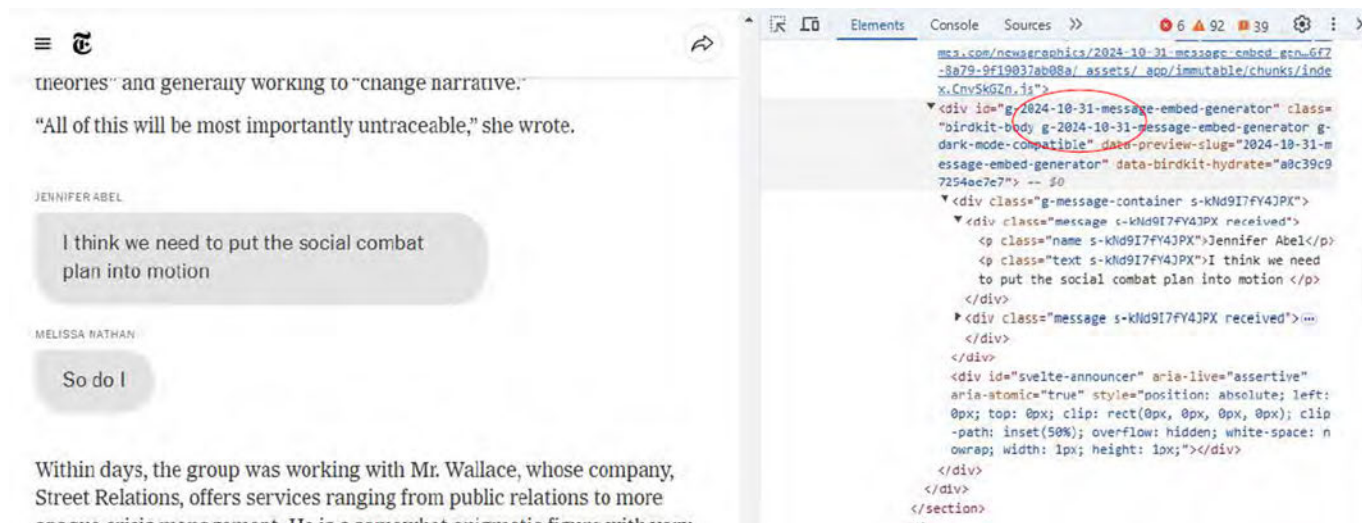
But careful observers noted that the file name for the video appears to indicate that it was created on December 12, 2024:



267. The video presented as unquestioned fact the false and defamatory claim that the Wayfarer Parties “orchestrated a smear campaign against Lively” and concluded in a feigned somber tone, “This story reveals a new playbook for waging a far-reaching and largely undetectable smear campaign in the digital age.” This video, as much as the Article itself,

constituted a malicious and reckless act of defamation and false light invasion of privacy by the Lively Parties against the Wayfarer Parties.

268. There is even reason to believe that the Times had been working on the Article months before, at least as of **October 31, 2024**. Careful observers reported that viewing the HTML source code for the Article revealed references to a “message-embed-generator” that referred to a date of “2024-10-31”:



Of course, it may be the case that the New York Times just happened to load a new tool for embedding text messages within an article as part of routine system upgrades, only to stumble six weeks later upon the perfect opportunity to show off this new graphic tool in an article that relied heavily upon cherry-picked and misleadingly reframed text messages. But the simpler explanation is that the New York Times had already begun building its defamatory Article no later than October 31, 2024, including developing a slick new graphic display module to prominently feature the misleadingly edited and context-stripped text messages centered in the Article.

269. It may seem unsurprising and even respectable that a news organization should work for weeks or months before publishing a purported investigative report. But the significance of the timing of these elements of the defamatory Article is that they strip away the legal shields



that Lively, the Times, and the other Lively Parties were likely relying on to protect their malicious acts of defamation, such as the litigation privilege and the fair reporting privilege.<sup>25</sup> Given the full scope of the Article's misleading manipulations, it is unsurprising that they would feel the need to attempt to erect protection against suit.

270. The Article refers to the 17-point letter of production conditions that Lively insisted upon. While the reasons for making many of those demands were mystifying to the Wayfarer Parties at the time, once the Article was published, it became clear that Lively had seeded her revenge more than a year before. By insisting on superfluous or already-extant "protections," Lively laid the foundation for her baseless claims of pervasive sexual harassment. When she buffaloed the Wayfarer Parties into agreeing, she sealed the perfect narrative poison pill, allowing her to later claim that the Wayfarer Parties' agreement to the 17-point letter was proof positive that sexual harassment was endemic on the Film's set.

271. But Lively had to explain away the self-inflicted mountain of bad press she had brought down on herself, as discussed elsewhere herein. Finally, Jones's wrongfully obtained texts could be deployed for maximum damage.

272. On information and belief, Lively and her team used cherry-picked text messages, stripped of context and even manipulated, to peddle a narrative that the Wayfarer Parties had responded to Lively's complaints about purported sexual harassment by plotting to destroy her reputation through a shadow smear campaign. Apparently, the *New York Times* credulously accepted the narrative wholesale while making little or no attempt to investigate the veracity of that narrative.

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<sup>25</sup> These hidden dates also put an end to the bizarre claim by the Lively Parties made in recent filings before the Court (Dkt. Nos. 17, 38, 43) that counsel for the Wayfarer Parties leaked the CRD Complaint to the press *before* the Lively Parties did.

273. By telling the *New York Times* a false and damning story about an insidious PR sabotage operation deployed as revenge for sexual harassment complaints, with the knowledge and intent that the newspaper would publish that false story, Lively and her co-conspirators committed the tort of defamation.

274. The Article's central thesis, encapsulated in a defamatory headline designed to immediately mislead the reader, is that the Wayfarer Parties orchestrated a retaliatory public relations campaign against Lively for speaking out about sexual harassment—a premise that is categorically false and easily disproven. If the Times truly reviewed the thousands of private communications it claimed to have obtained, its reporters would have seen incontrovertible evidence that it was Lively, not the Wayfarer Parties, who engaged in a calculated smear campaign. The complete communications demonstrate beyond question that the Wayfarer Parties had no intention of “destroying” or “burying” Lively through aggressive tactics. On the contrary, Baldoni consistently expressed his desire to avoid harming Lively and protect the Film but also recognized a legitimate need for public relations protection in light of Lively's false and damaging claims.

iMessage  
Mon, Aug 19 at 7:01AM

Melissa Nathan

Good morning.

Sharing with you a perfect example of why we don't use "bots"

I wouldn't even worry to think they've hired a team as a) nothing to find b) they hired an awful team which I've sent to our guy to track and pull so we have evidence of it.

This below should answer everyone's question on what a bot team looks like when every single comment suddenly skews in her favour in a nonsensical way

<https://www.instagram.com/p/C-2Tcm1t4Mp/?igsh=Mjc4MmM1YmI2Ng==>

At LEAST sprinkle them in.

She needs to fire her bot team.

Justin

How can we say somehow that we are not doing any of this – it looks like we are trying to take her down

Melissa Nathan

It doesn't. They are doing all of this themselves and it's really obvious.

This is bots.

more



reupt\_manning 2h

Zionist after her bc of she is friends with Eliot Vance (husband of Cameron) all



Justin

Ok please

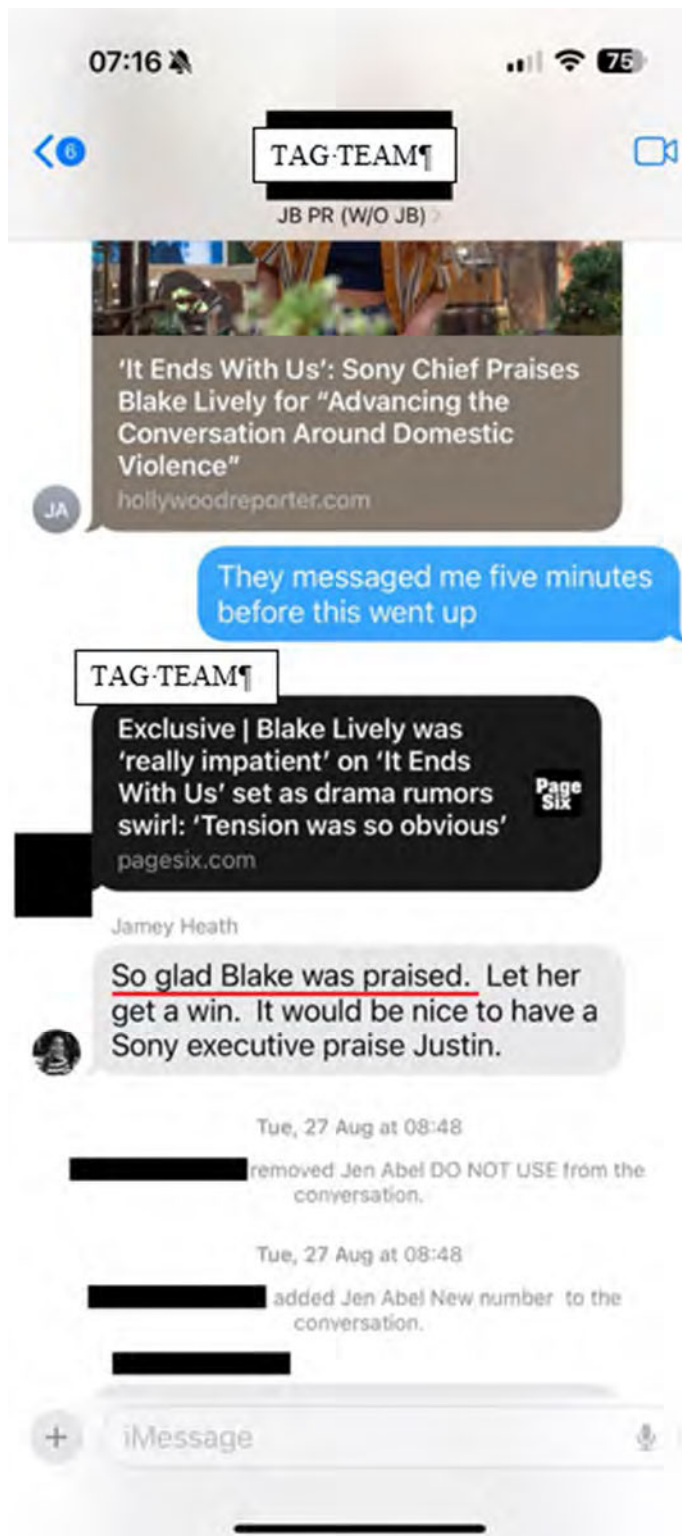
Monitor

Things I'm more worried about is that we are planting these stories which is not true obviously

Jen Abel Old Number

Chiming in here. The people saying that there are bots and this is a PR play on your side is a minority voice compared to the thousands and thousands

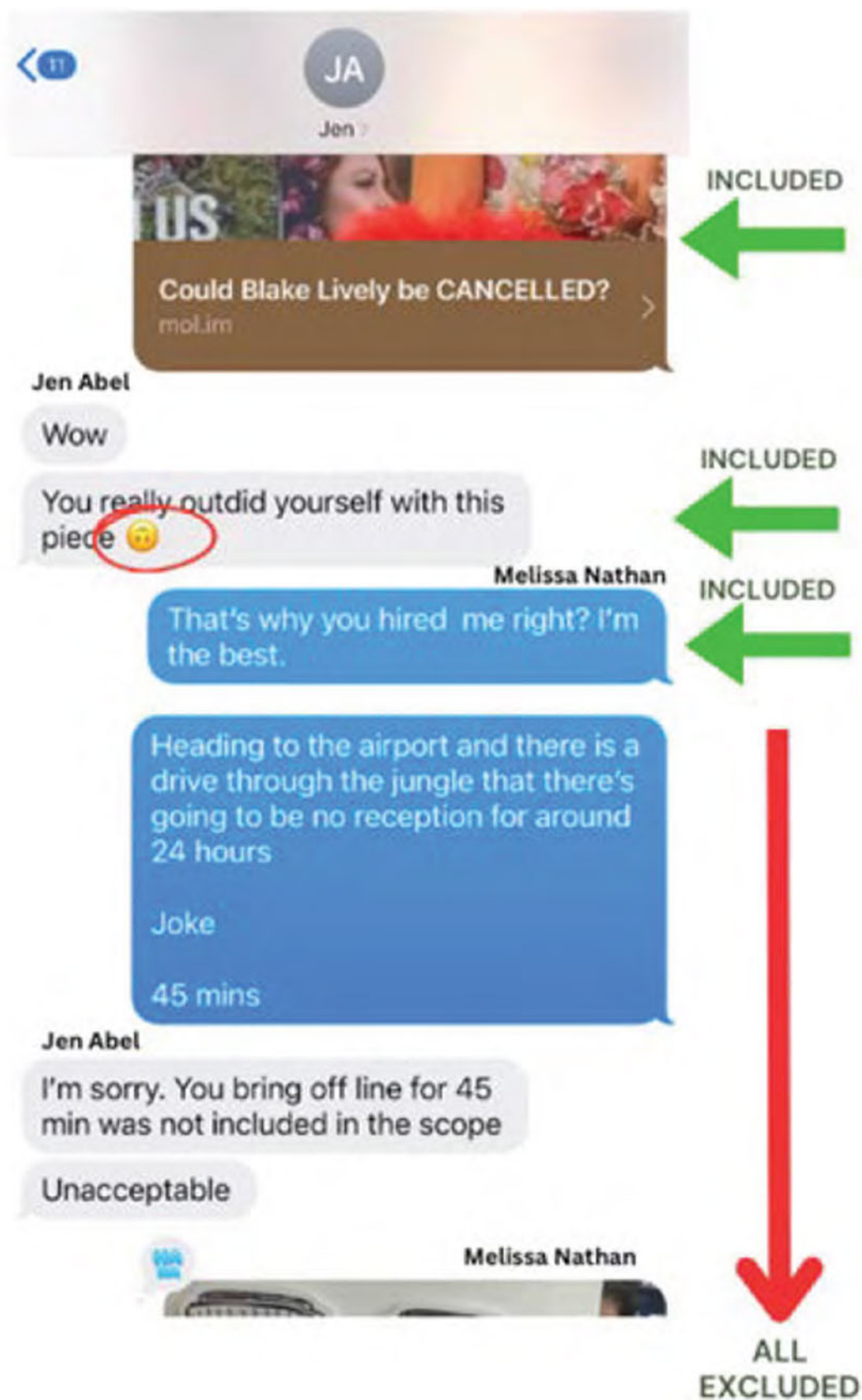
who are calling it what it is, and reacting to Blake's own actions and interviews. We never want the action of the minority to dictate what we do on our end. We have to always look at the big picture which is still enormously on your side. But, I do see a want and need from fans to move on. People are now commenting that they are bored with the many articles still coming out about this drama. When we move on, they do too. So we need to find ways to keep elevating not just the DV reaction, but also the other things in your life like family, being back home, and wayfarer. That's not tone deaf in my opinion, but sends the message that you are focusing on what really matters and that's what will help with the Blake narrative too. My POV.



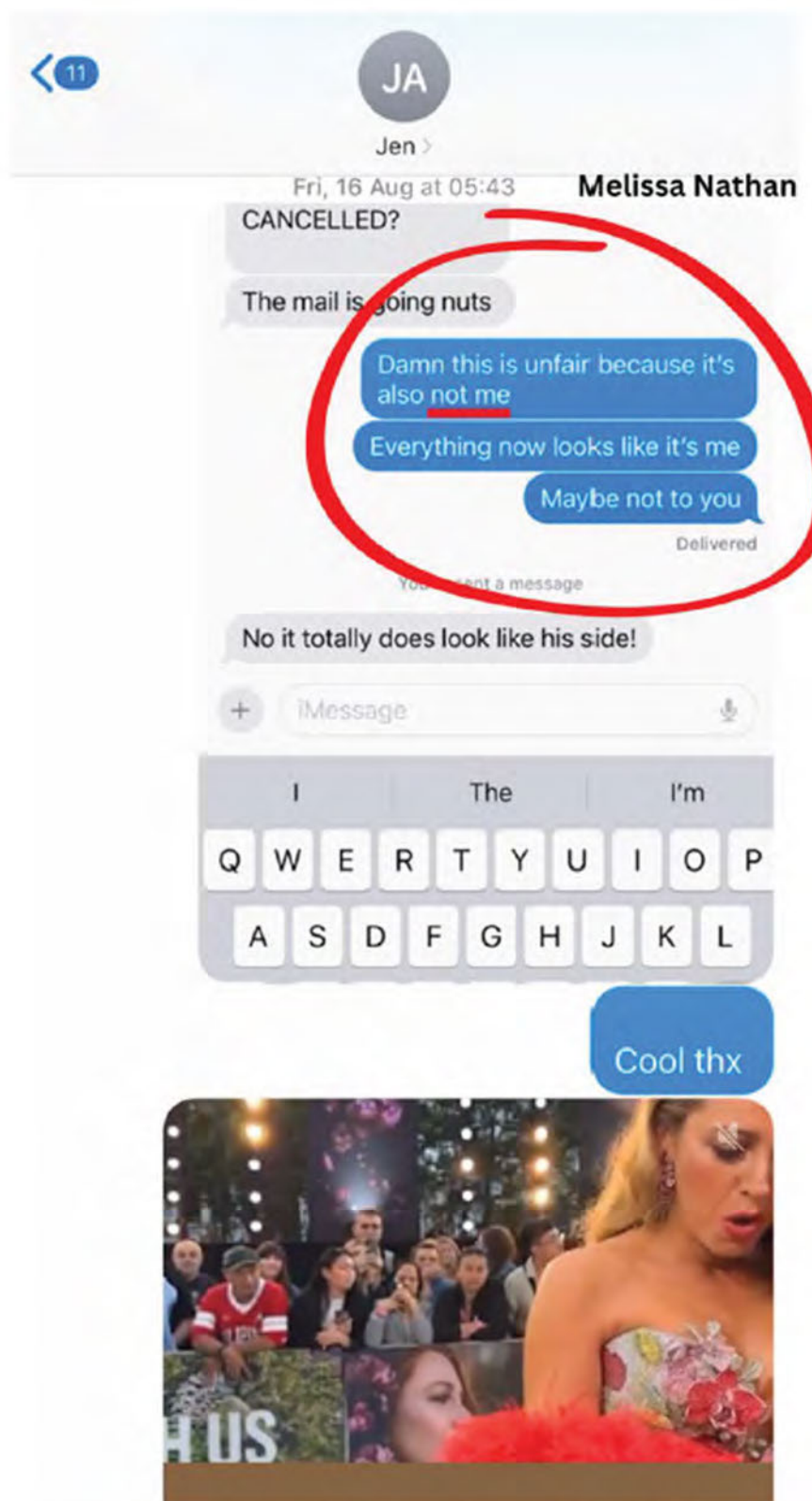
275. For example, Lively's CRD complaint, which, on information and belief and as shown above, she provided to the *New York Times* long before filing it, references text exchanges

between Nathan and Abel as purported evidence that Nathan planted a negative story in the Daily Mail titled “Is Blake Lively set to be CANCELLED?” Lively’s portrayal is categorically false, misleading, and devoid of factual basis, yet knowingly propagated by Lively to the *Times*, which endorsed it without reservation. Lively’s “smear campaign” narrative hinges on an August 16th text exchange in which Nathan allegedly shared a link to this article with Abel. The text exchange shows Abel responding, “Wow,” followed by, “You really outdid yourself with this one,” to which Nathan allegedly replied, “That’s why you hired me, right? I’m the best.” These messages constitute the entirety of the purported evidence underlying the allegation of a “smear campaign” orchestrated on behalf of Baldoni. But the information Lively fed to the *New York Times* was apparently selectively and deceptively edited, resulting in a gross misrepresentation that actually *reversed* the sarcastic meaning and tone of the messages.





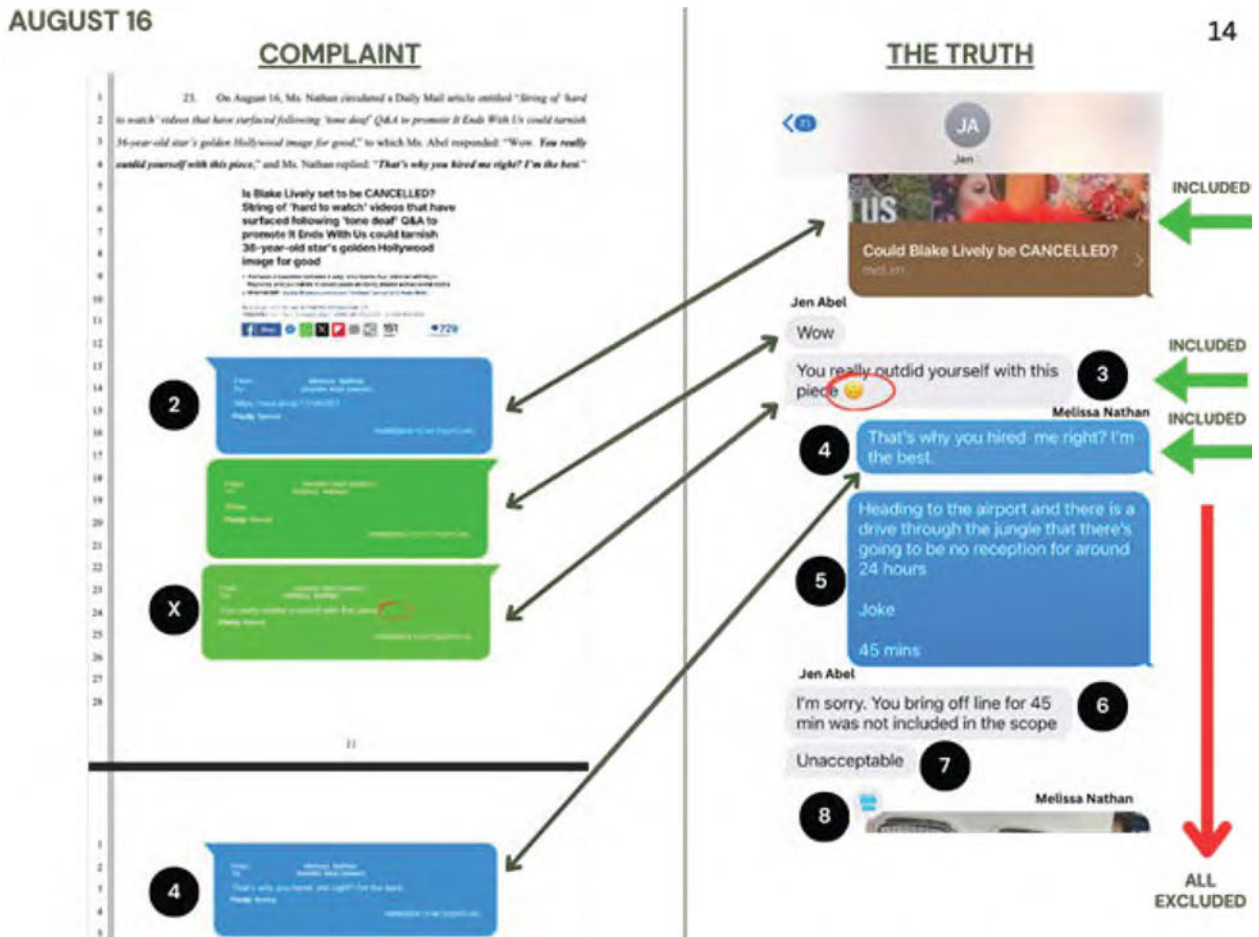
276. Lively and the Times, while they collaborated closely on the Article, must have known that the text messages were unscrupulously altered and selectively edited, enabling Lively and her team to propound a false “smear campaign” narrative designed to destroy the Wayfarer Parties for the *Times*’ knowing or reckless dissemination. Specifically, in the immediately preceding text message exchange on August 16, Nathan forwarded a screenshot of a message from a reporter informing her, for the first time, of the Daily Mail article. In response, Nathan wrote, *“Damn. This is not fair because it's also not me,”* followed by, *“Everything now looks like it’s me.”* Perhaps unknowingly, Nathan was already anticipating the accusations that would soon be leveled against her and her fellow the Wayfarer Parties.



EXCLUDED

INCLUDED

277. Further evidence of Lively’s machinations—and the New York Times’ malicious and reckless defamation—appears in the missing emoji heard ’round the world. After Nathan forwarded a screenshot of the article link, Abel responded with, “You really outdid yourself with this piece 😏,” adding a “😏” to indicate the sarcastic nature of her message. The “😏” emoji is commonly used to convey irony, sarcasm, joking, or a sense of goofiness or silliness.



278. In her CRD complaint and apparently in the materials she forwarded to the *Times* for their malicious and reckless publication, Lively deliberately excluded not only the preceding screenshot of the text exchange in which Nathan denies involvement in the story, but also the ‘😏’ emoji, fundamentally and willfully altering the sarcastic tone of Abel’s message to mislead the reader into interpreting Abel’s response as literal and sincere. This omitted context is critical, as it

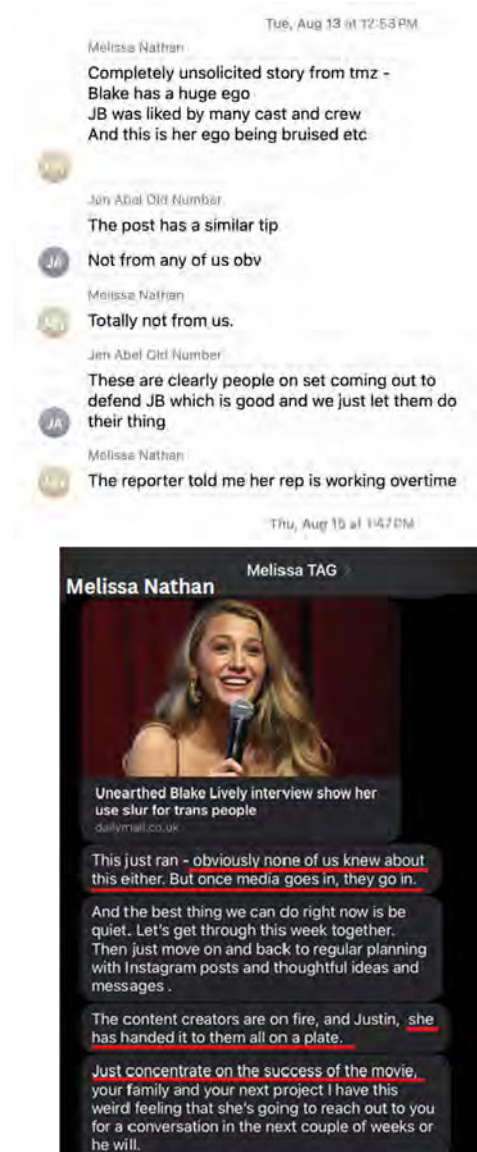
demonstrates that each subsequent message in the exchange was similarly intended as sarcasm, including Nathan’s statement, “That’s why you hired me, right? I’m the best.” Further review of the text message exchange—also deliberately excluded from both Lively’s CRD complaint and the *Times* article—unequivocally shows that Abel and Nathan were engaging in a sarcastic and joking manner, as evidenced by the use of the ‘HaHa’ tapback reaction. When read in full, the exchange reveals Nathan and Abel engaging in facetious, wry banter bordering on gallows humor in response to their predicament—not conspiring against Lively. Lively, and in turn the *Times*, misrepresented these communications to support her salacious and unfounded “smear campaign” narrative. This calculated distortion underscores Lively’s duplicity, as well as the Article’s lack of credibility and the *Times*’ reliance on sensationalism over substantive truth.

279. Any negative press about Lively was unequivocally a consequence of her own actions. Even the *Times* itself acknowledged Lively’s public missteps in an August 17, 2024, article titled, “*It Ends with Us: The Press Tour Drama, Explained.*” In it, reporter Shivani Gonzalez observed: “Lively’s promotion of the movie has included a push for her new hair care line, discussion of the clothes in the movie, and response to questions about abuse, which have been criticized as shallow and tone deaf . . . Baldoni, by contrast, has emphasized the importance of raising awareness of domestic violence and providing resources for those in similar situations.”<sup>26</sup>

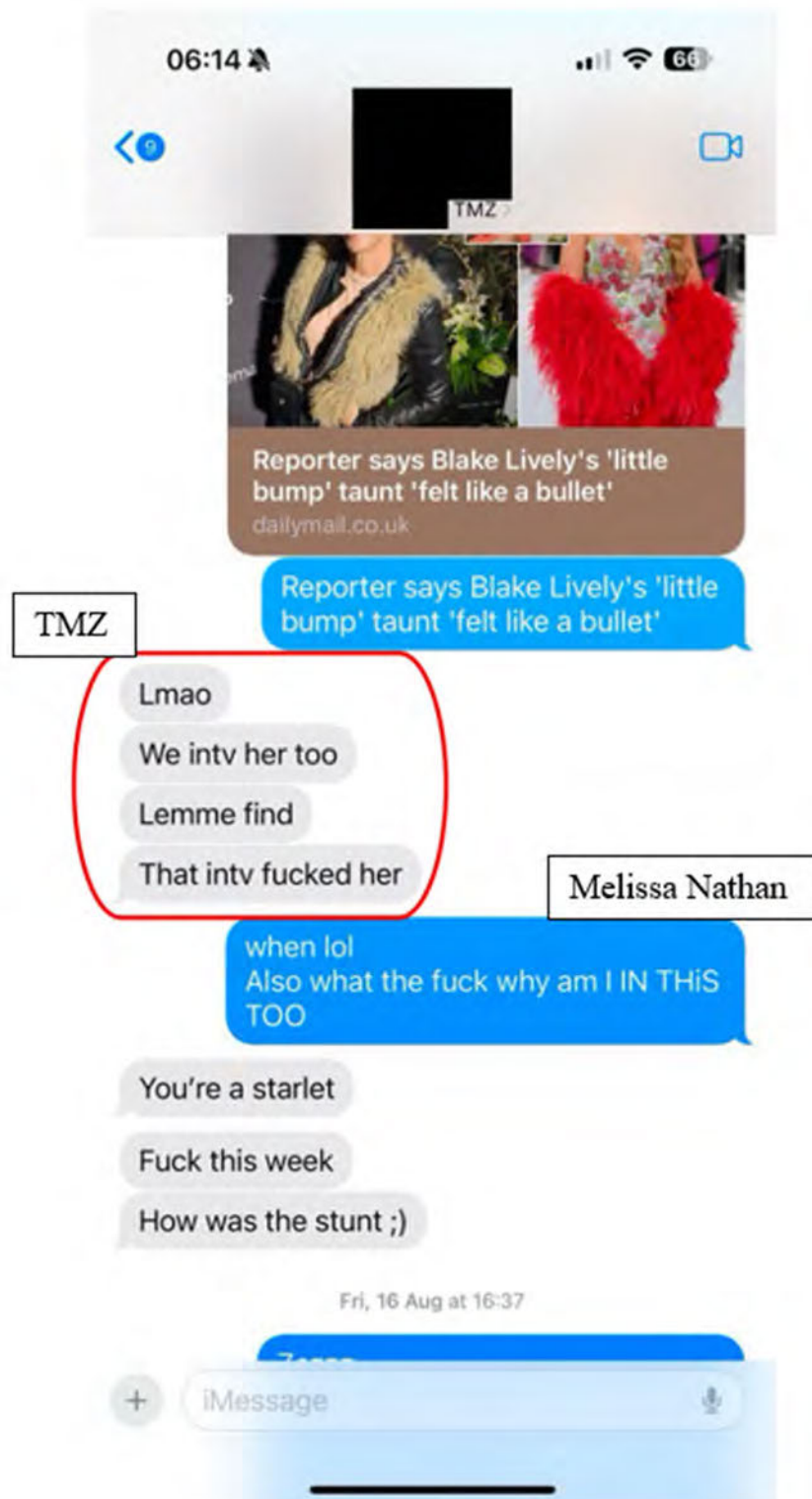
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<sup>26</sup> See also Natasha Jokic, *Here’s What’s Going On With The ‘It Ends With Us’ Drama* (Aug. 12, 2024), <https://www.buzzfeed.com/natashajokic1/it-ends-with-us-blake-lively-justin-baldoni>; Carly Johnson and Lillian Gissen, *Blake Lively goes into damage control FINALLY addressing the domestic violence in It Ends With Us Amid Criticism over ‘tone deaf’ film promo* (Aug. 13, 2024), <https://www.dailymail.co.uk/tvshowbiz/article-13740773/Blake-Lively-address-domestic-violence-Ends-film.html>; Lillian Gissen, *Blake Lively fans blast It Ends With Us actress over ‘tone deaf’ and “shallow” interview with costars* (Aug. 12, 2024), <https://www.dailymail.co.uk/femail/article-13739569/blake-lively-tone-deaf-domestic-violence-interview.html>; Elyse Wansehl, *People Are Disgusted By Blake Lively’s Cutesy Press Tour For ‘It Ends With Us’* (Aug. 14, 2024), <https://www.dailymail.co.uk/femail/article-13739569/blake-lively-tone-deaf-domestic-violence-interview.html>; Eboni Boykin-Patterson, *Blake Lively Dragged for Marketing Light of Domestic Violence* (Aug. 14, 2024), <https://www.thedailybeast.com/blake-lively-dragged-for-making-light-of-domestic-violence/>; Alex Abad-Santos,



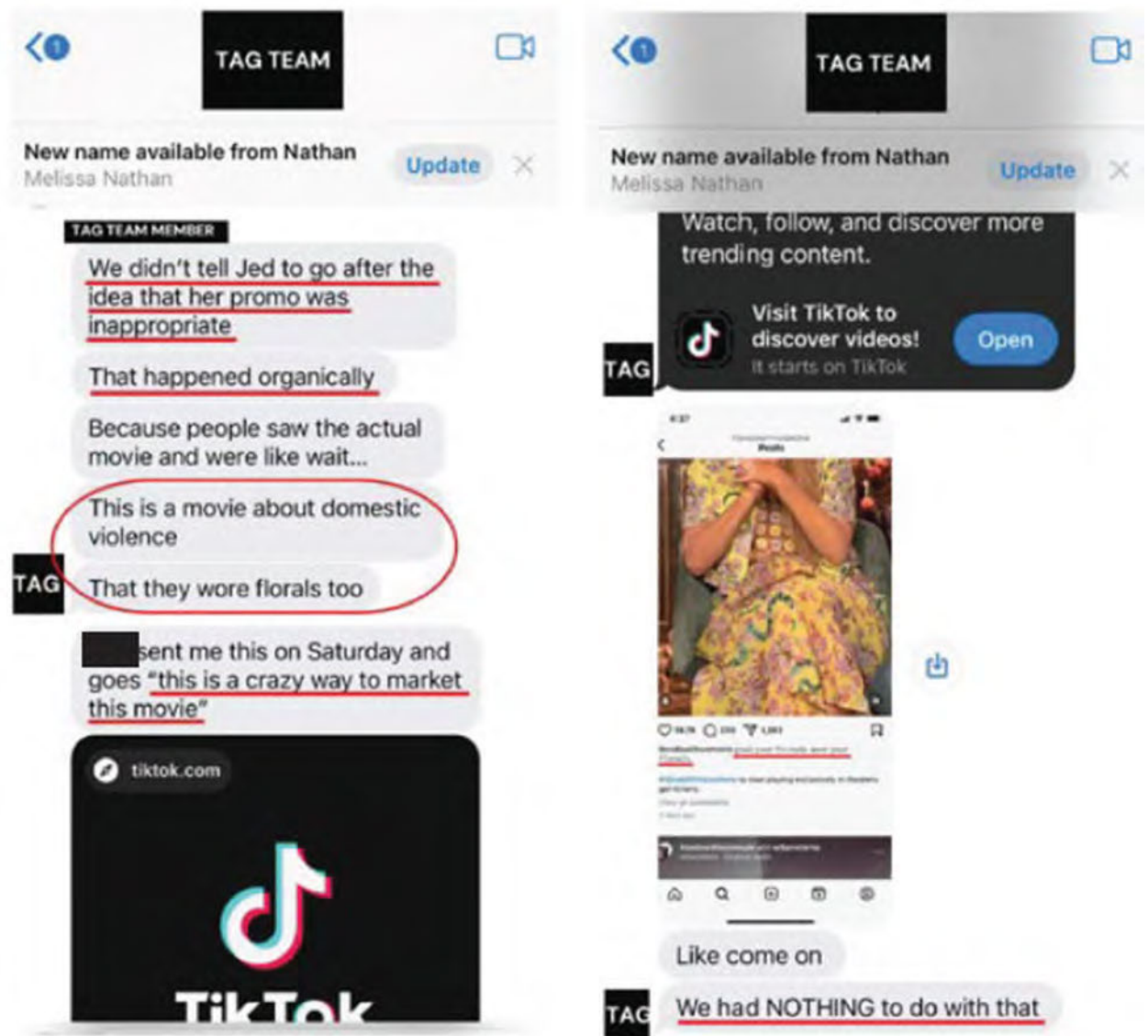


Why is everyone mad at Blake Lively? (Aug. 15, 2024), <https://www.vox.com/culture/367451/blake-lively-it-ends-with-us-press-tour-controversy>; Olivia Craighead, *Fans Are Not Impressed with Blake Lively's Press Tour* (Aug. 15, 2024), <https://www.thecut.com/article/blake-lively-it-ends-with-us-press-tour-tone-deaf.html>; Carolyn Gevinski, *The It Ends With Us promo has failed domestic violence survivors like me* (Aug. 16, 2024), <https://www.glamourmagazine.co.uk/article/it-ends-with-us-domestic-abuse-first-person>; Angela Yang, *Blake Lively's 'It Ends With Us' promotion called 'disrespectful' by some survivors of abuse* (Aug. 19, 2024), <https://www.nbcnews.com/pop-culture/blake-lively-it-ends-with-us-promotion-criticism-rcna167175>; Arwa Mahdawi, *Sorry, Blake Lively: using a movie about domestic violence to sell stuff is not a good look* (Aug. 20, 2024), <https://www.theguardian.com/commentisfree/article/2024/aug/20/blake-lively-it-ends-with-us-colleen-hoover>; Hannah Holland, *'It Ends With Us' was already problematic. Blake Lively's press tour made it worse.* (Aug. 27, 2024), <https://www.thecut.com/article/blake-lively-it-ends-with-us-press-tour-tone-deaf.html>.



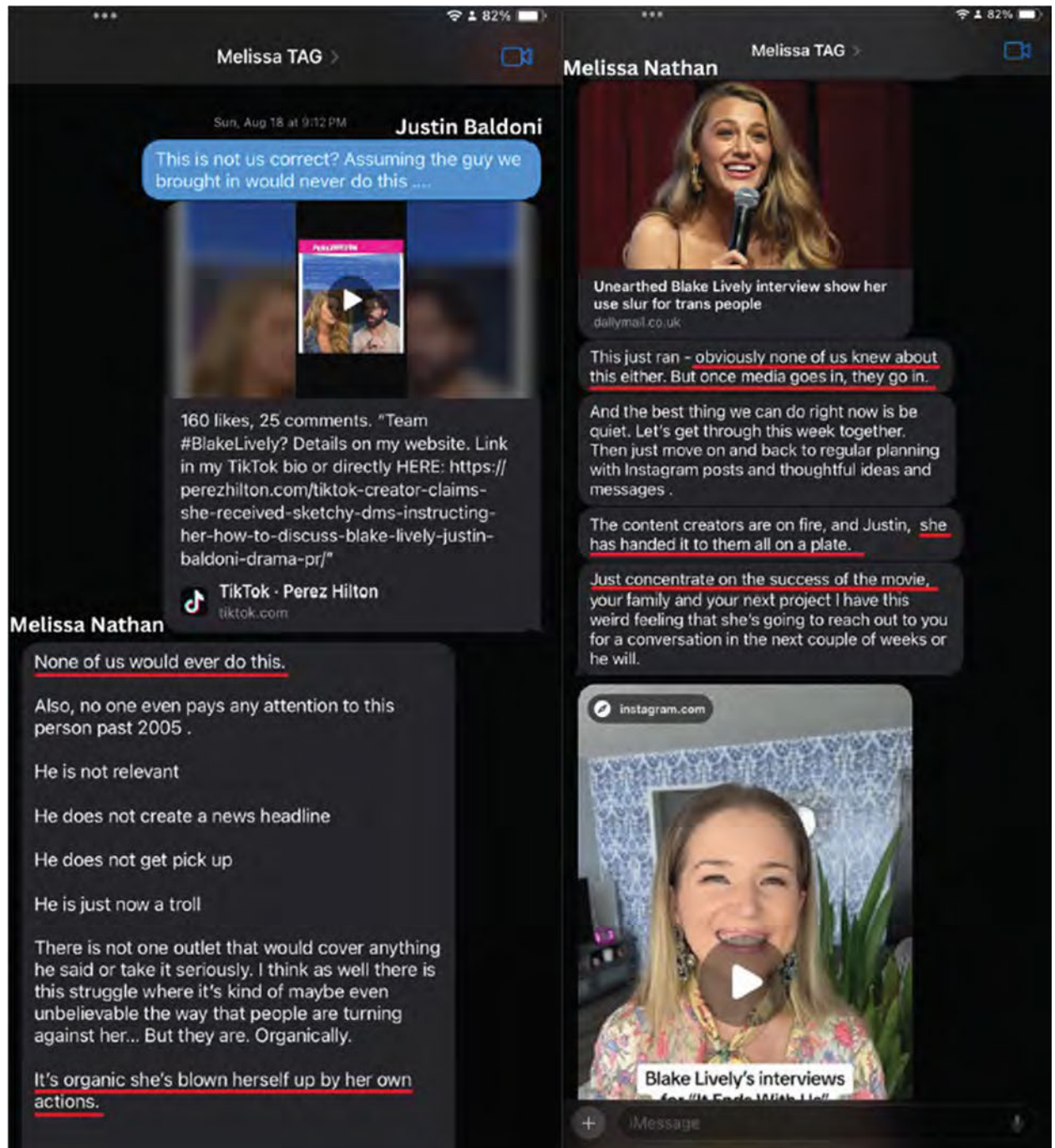
280. As noted elsewhere herein, Lively’s marketing efforts, which included encouraging audiences to “grab your friends, wear your florals” while promoting her hair care and alcohol

brands, were widely criticized as insensitive. This was particularly glaring given the well-known links between domestic violence and alcohol consumption. Her actions naturally triggered organic public criticism and unleashed a cycle of negative coverage, including, as is common in the digital age, the resurfacing of old, unflattering content.



281. Far from being the product of a calculated smear campaign by the Wayfarer Parties, the backlash against Lively was the inevitable fallout of her own mercenary messaging and self-

promotional tactics, amplified by her inability to read the room in addressing such a serious subject.



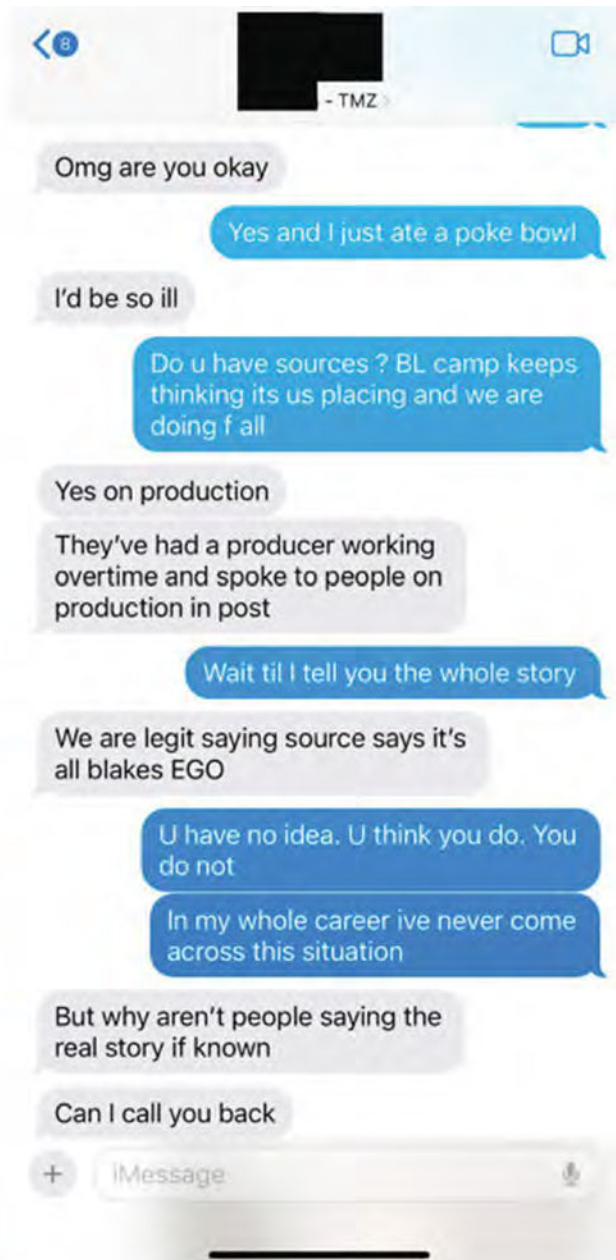
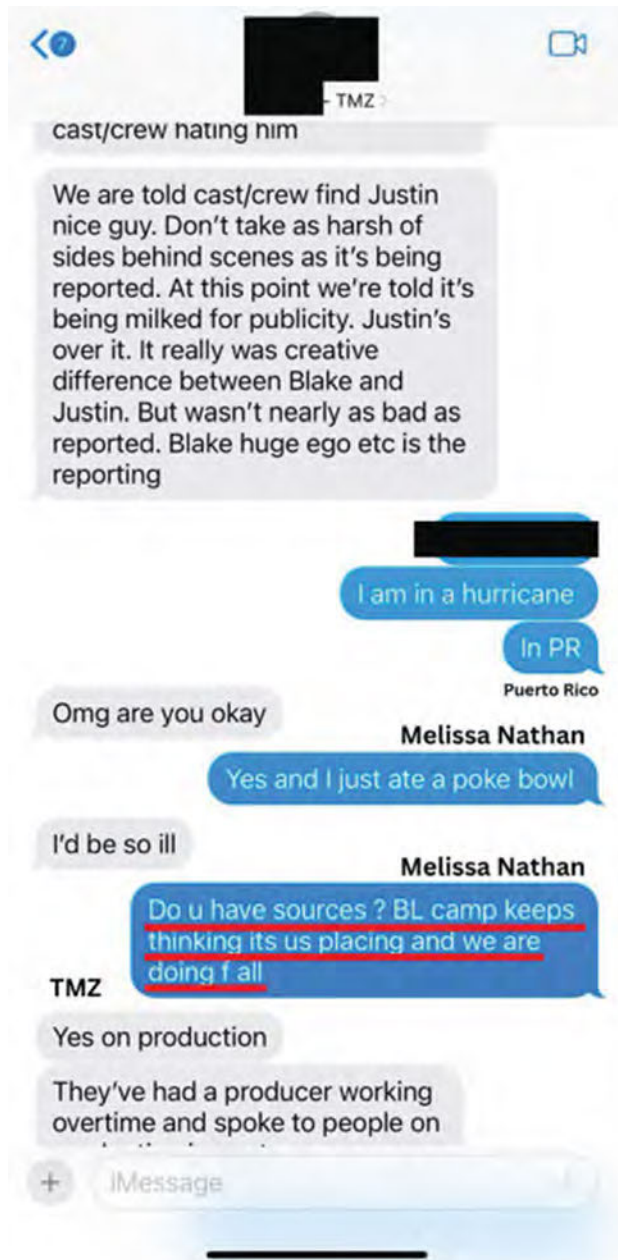
282. The Article also deliberately ignores that Lively's publicist, Leslie Sloane of Vision PR, once backed by Harvey Weinstein, seeded stories critical of Baldoni, including that Baldoni

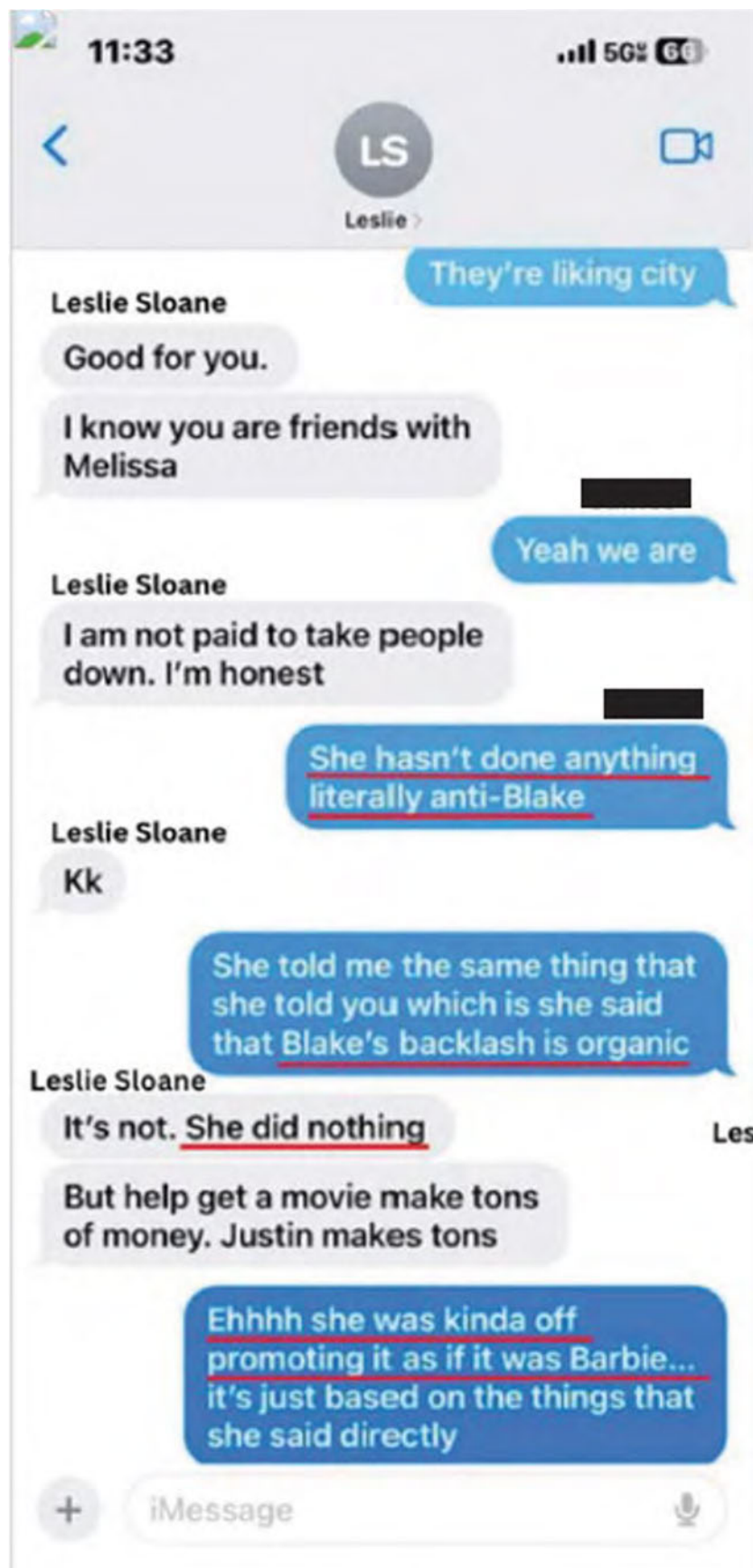


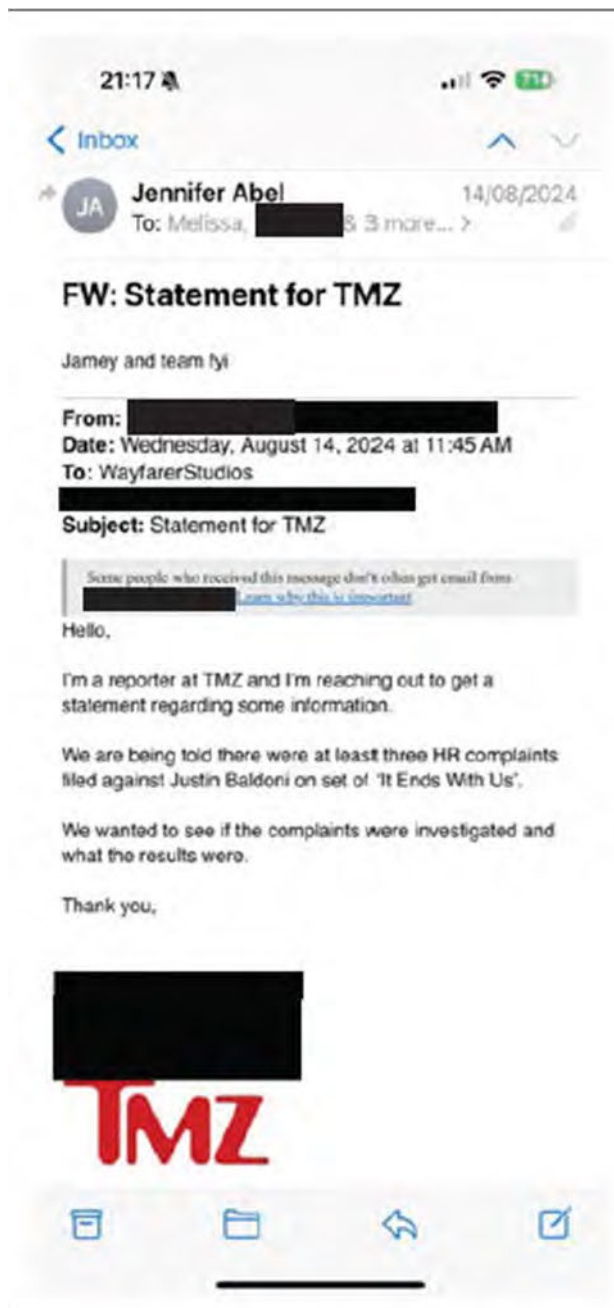
was a sexual predator, ahead of the Film's release. Sloan did so even while Nathan attempted to negotiate in good faith.

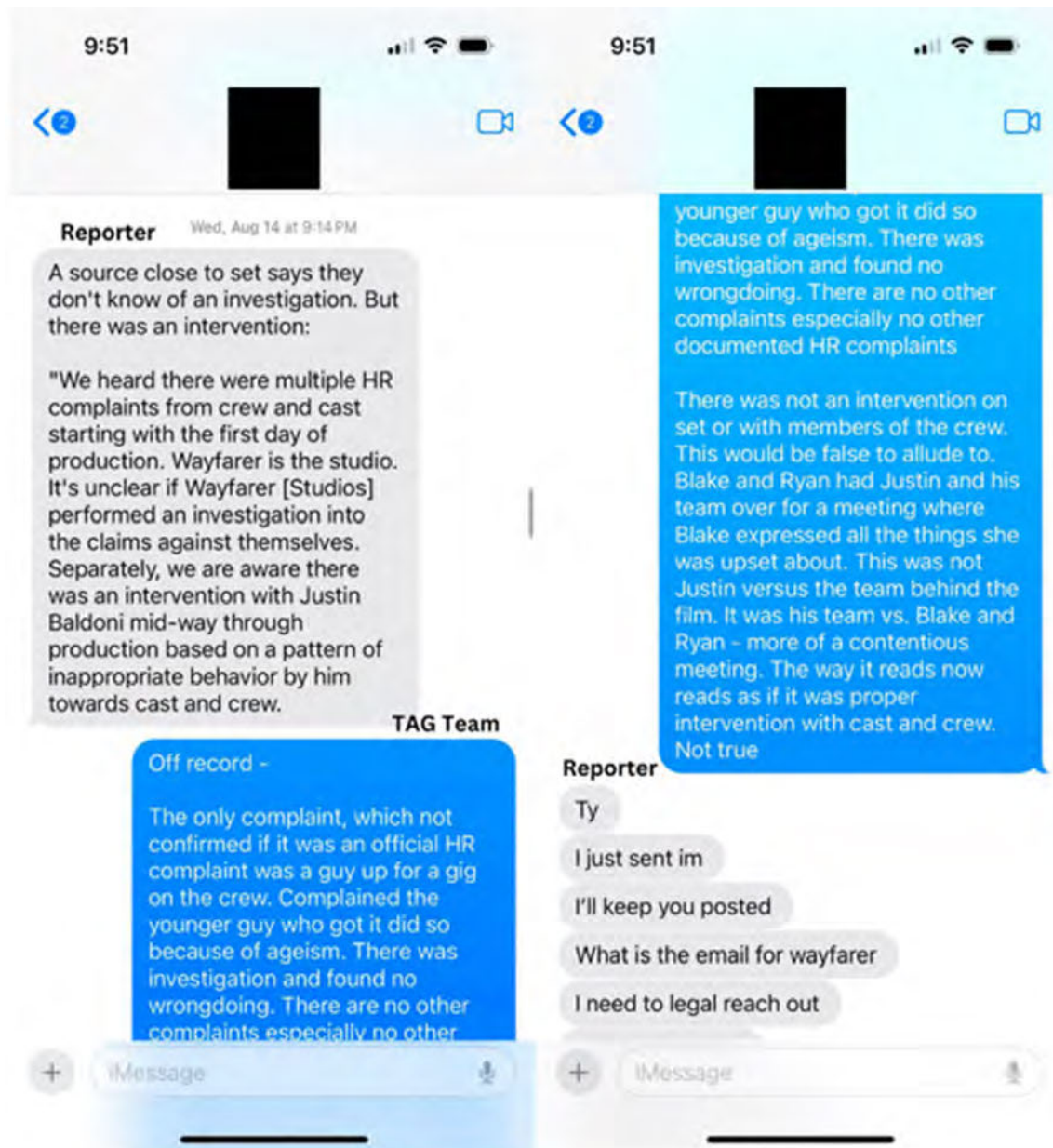




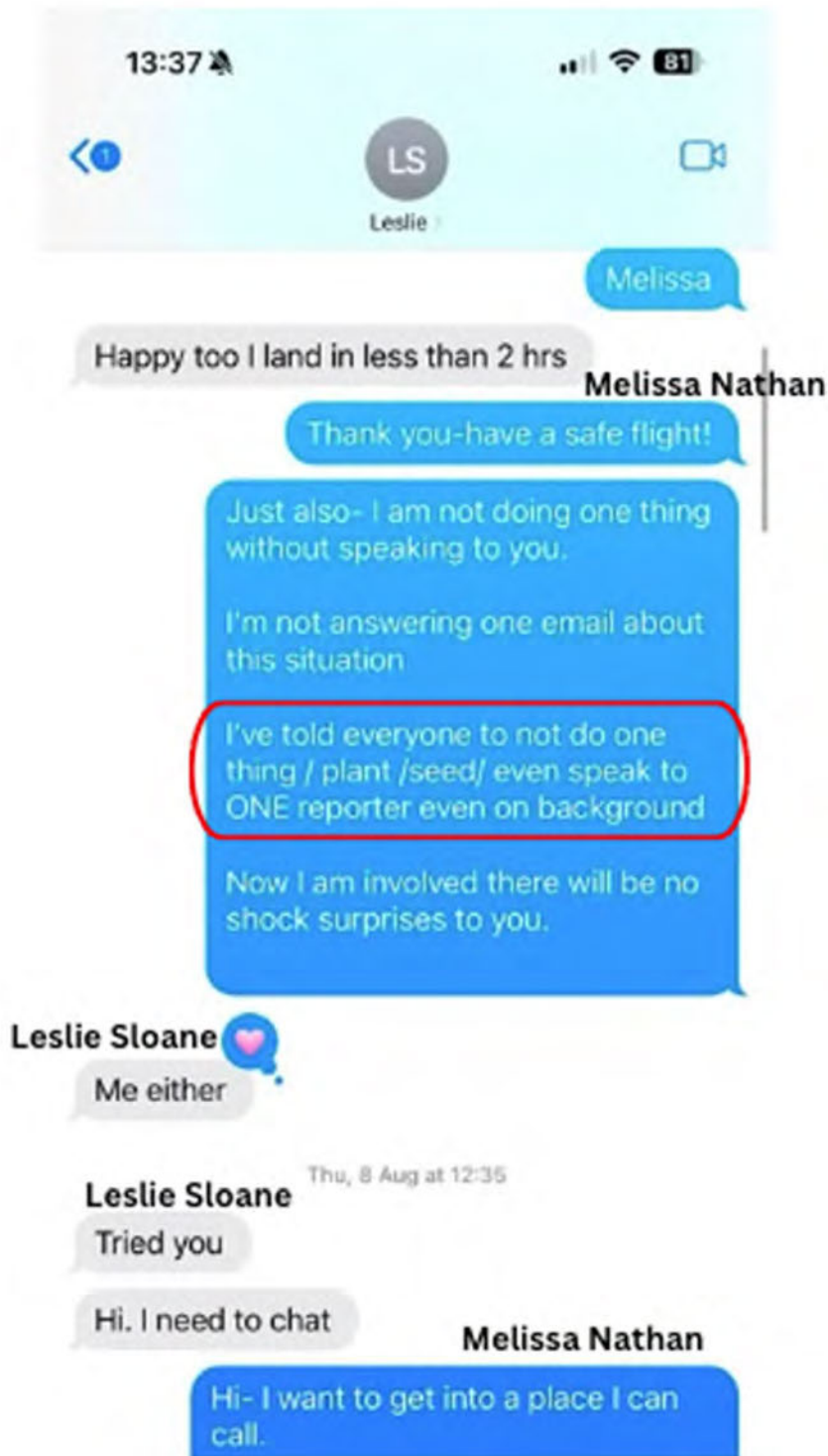








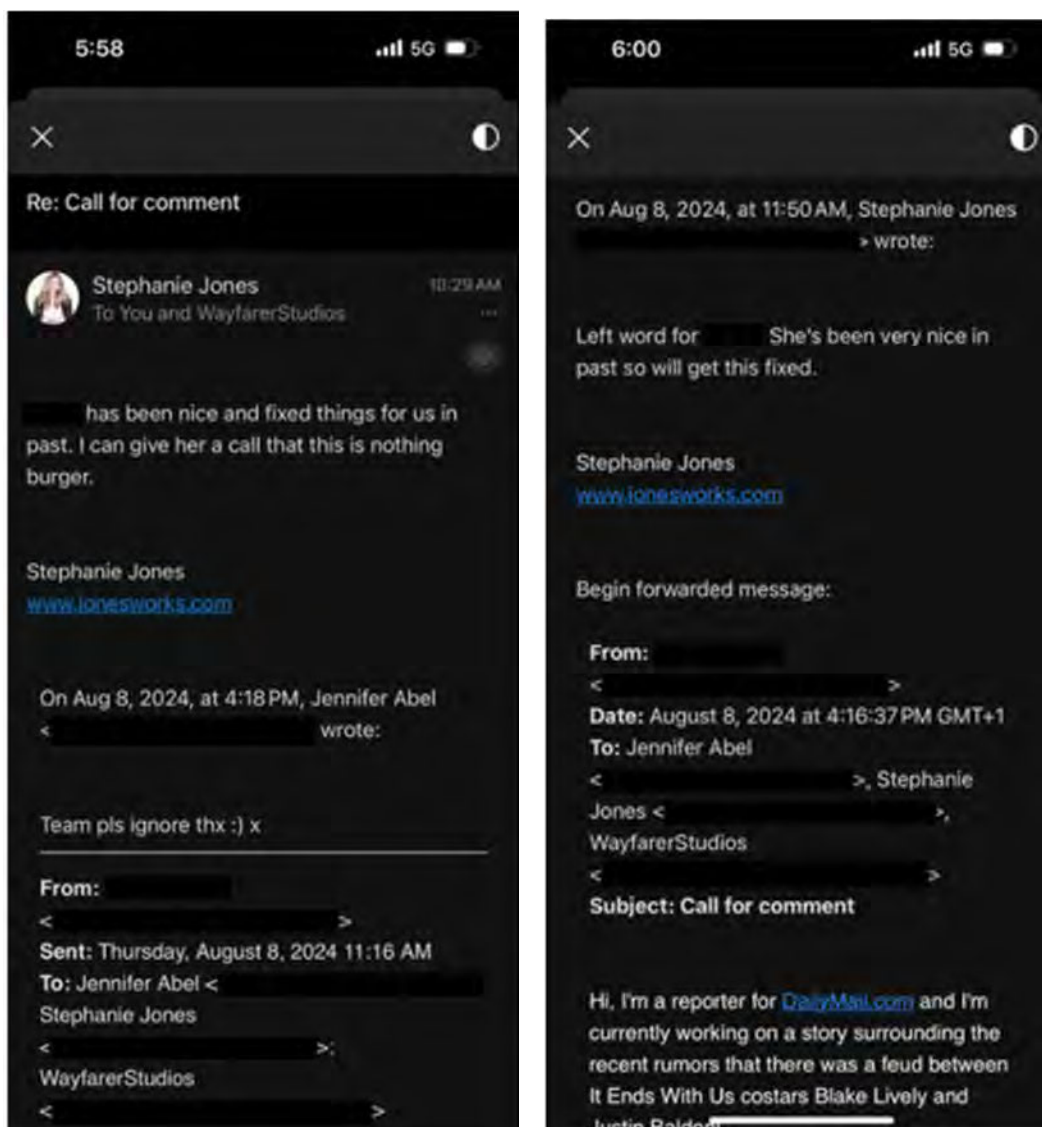




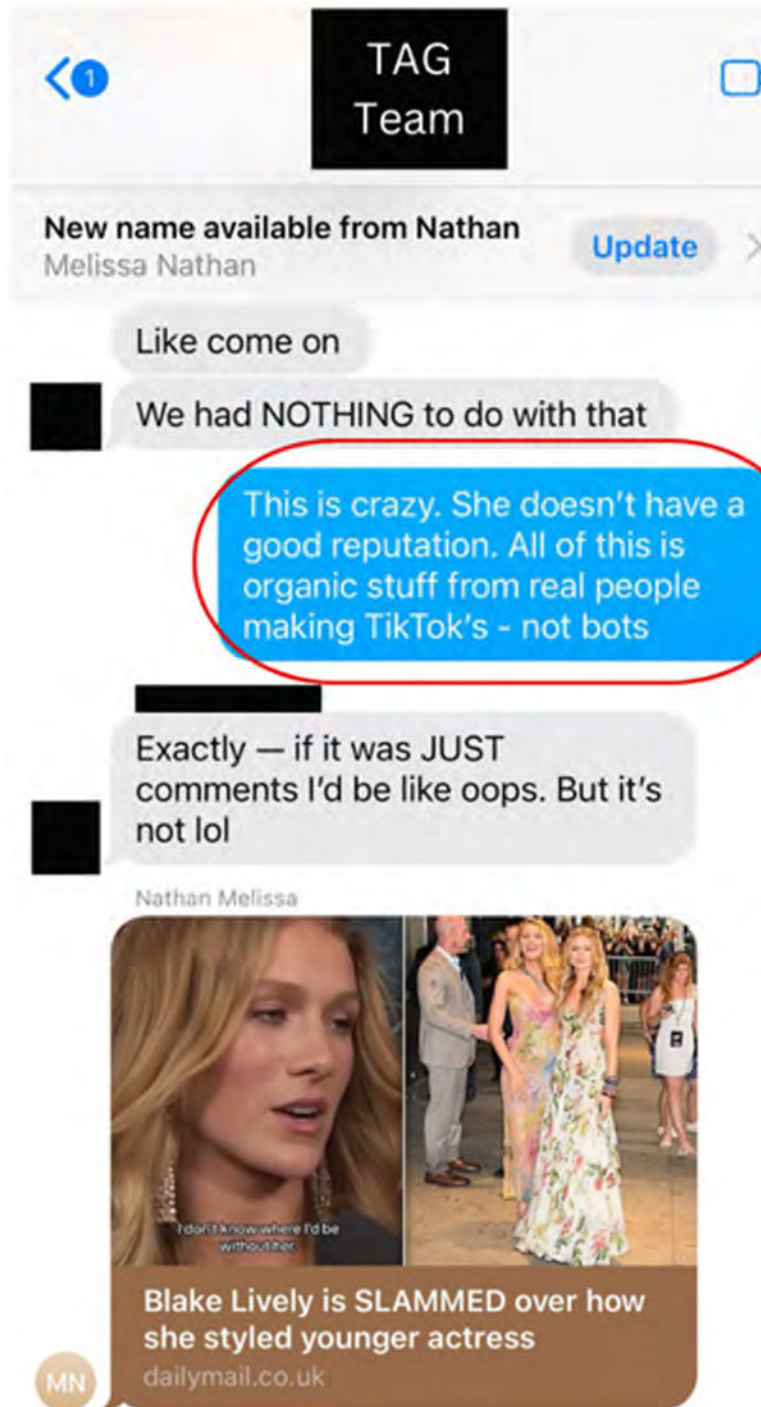
283. To assert that the Wayfarer Parties orchestrated a premeditated smear campaign is to disregard objective evidence that unequivocally contradicts such claims. Even a cursory investigation by the Times would have exposed the baseless nature of Lively's allegations and the



lack of factual support for her narrative. Most troubling, however, is the Times' deliberate omission of a critical player in this manufactured controversy: Stephanie Jones. Once Baldoni's and Wayfarer's trusted public relations representative, Jones not only had intimate access to the communications strategy and crisis management surrounding the Film but also played a pivotal role in leaking private communications cited in the Article. Her betrayal, driven by a quid pro quo arrangement with Lively, appears aimed at shielding herself while aligning with Lively to curry favor and secure future opportunities.



284. The Times' failure to scrutinize Lively's false claims or even to provide a balanced account of the events further underscores its role in amplifying Lively's falsehoods while abandoning its responsibility to truth and accuracy. To suggest, as the Times does, that the Wayfarer Parties engaged in the dark arts of public relations to destroy Lively's reputation is to ignore that Lively had longstanding reputational challenges and that the Wayfarer Parties' public relations efforts were rudimentary, above-board, and entirely defensive. The Times willingly omits any meaningful discussion of the true source of tension between Lively and the Wayfarer Parties, which was Lively's brazen and calculated effort to expropriate the Film.



285. While the *Times* thrusts allegations of an offensive smear campaign concocted by the Wayfarer Parties, the incomplete and misleading evidence supplied by Lively, and on which the *Times* purports to rely, proffers a warped view of reality. Setting aside the unscrupulous means

by which the cited communications were obtained, the Times, as with Lively's CRD Complaint, deliberately takes these communications out of context to bolster a fallacious narrative (designed in concert with Lively) to harm the Wayfarer Parties. When viewed in full context, these handpicked, doctored communications lose their manufactured impropriety and disprove Lively's allegations:

23. On August 16, Ms. Nathan circulated a Daily Mail article entitled "String of 'hard to watch' videos that have surfaced following 'tone deaf' Q&A to promote *It Ends With Us* could tarnish 36-year-old star's golden Hollywood image for good," to which Ms. Abel responded: "Wow, *You really outdid yourself with this piece,*" and Ms. Nathan replied: "*That's why you hired me right? I'm the best.*"

**Is Blake Lively set to be CANCELLED?**  
String of 'hard to watch' videos that have surfaced following 'tone deaf' Q&A to promote *It Ends With Us* could tarnish 36-year-old star's golden Hollywood image for good

• Andward conversation between Lively, who shares her children with Ryan Reynolds, and journalists in recent years are being shared across social media  
• **READ MORE** [Julia Roberts will never 'bustle' request of \*It Ends With Us\*](#)

By Katherine Vagg and Ben Huhner (2024-08-16) | 151 views | 729 likes

From: Melissa Nathan (Executive Admin)  
To: Jennifer Abel (Owner)  
Subject: https://mail.com/13/16/03  
Priority: Normal  
16AUG2024 13:48:19(UTC+0)

From: Jennifer Abel (Owner)  
To: Melissa Nathan  
Subject: VWow  
Priority: Normal  
16AUG2024 13:37:17(UTC+0)

From: Jennifer Abel (Owner)  
To: Melissa Nathan  
Subject: You really outdid yourself with this piece...  
Priority: Normal  
16AUG2024 13:37:00(UTC+0)

1

JA  
Jen  
Fri, 16 Aug at 05:43  
CANCELLED?  
The mail is going nuts  
Damn this is unfair because it's also not me  
Everything now looks like it's me  
Maybe not to you  
Delivered  
No it totally does look like his side!  
Cool thx

2

EXCLUDED

INCLUDED

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**writing**

Not in love with the document they sent -  
Not sure I'm feeling the protection I felt on the call

Jan Abe Old Number

This is the first time I've personally gone through scenario planning with them so I think let's let them discuss the thinking behind the document and the actual process and protocol of how they implement these things. That's the most important part of this is how quickly they can shut things down and place stories in your favor. Be honest on this call and let's give real feedback to each point.

Jenny

Yeah, just feels very much like there is much defense and also them feeling strong like she's going to do something just a bit concerning what everyone had originally thought

Jan Abe Old Number

The truth is your defense. You have done nothing wrong and there is over a year worth of facts and paper trails and people who can go on background as your defense. This document is an overview. And I think as the situation evolved, and as it has become realized the great lengths she has gone to in order to cut you out of not just the film but promo, the premiere, etc, we need to prepare as if she will also go through any great lengths with press. It's a good thing if we all prepare for the worst outcome because then if and when it's not as bad, we are OVER prepared.

Jenny

17 From: [Hilary Jones](#)  
 18 [Hilary Jones \(owner\)](#)

19 We can't write it down to him.  
 20 We can't write his mail postbox for. We will go to do. We will do this. We will  
 21 do this.  
 22 [Hilary Jones](#) [\(2246024 15 48 05/17\) \(4\)](#)

23 From: [Bernice Taylor](#)  
 24 [Bernice Taylor \(owner\)](#)

25 I'd like to look at it as an information document for us to be shared with  
 26 them. It's a document saying all the things that he wants to do up in the wrong  
 27 [Bernice](#)  
 28 [Bernice](#) [\(2246024 15 48 05/17\) \(4\)](#)

20:35

JA

Jon

We can't write it down to him.  
We can't write we will destroy her.  
We will go to this. We will do this.  
We will do this. We will do this.

INCLUDED

Of course not. But I told him that's the point of talking through

EXCLUDED

He has to look at it as an information document for us to be armed with That's all. Imagine if a document saying all the things that he wants ends up in the wrong hands.

INCLUDED

The work is not the document. The work is the fucking crisis lol

EXCLUDED

If it's any consolation, he's like this with everything. Over thinks. Stresses. High anxiety.

EXCLUDED

He just needs to be educated on how this process works

EXCLUDED

you know we can bury anyone  
But I can't write that to him.  
I will, I'll be very tough

INCLUDED

DIRECT RESPONSE



14. Ms. Nathan followed this by assuring Ms. Abel: "you know we can bury anyone. But I can't write that to him."



15. A few days later, on August 5, 2024, Mr. Baldoni set the narrative for the social media campaign, sending Ms. Abel a screenshot of a thread on X that had accused another female celebrity of bullying women. Mr. Baldoni stated, "this is what we would need."



16. Ms. Abel responded that she had just "spoke(n) to Melissa about this... about what we discussed last night for social and digital." Ms. Abel added, "Focus on reddit, TikTok, IG." With reassurance that Ms. Lively would be "destroy[ed]" and "buried," Wayfarer and Mr. Baldoni directed Ms. Nathan and her team to actively engage in their retaliatory "social manipulation" campaign.

This is what we would need

Yes I literally just spoke to Melissa about this on the break about what we discussed last night for social and digital

Focus on reddit, TikTok, IG



She wants to interview me

Want to have her email me?



She is smiling - I said I would make it happen



18 The retaliation campaign relied on more than just publicists and crisis managers  
 19 spinning stories. They also retained subcontractors, including a Texas-based contractor named Jed  
 20 Wallace, who weaponized a digital army around the country from New York to Los Angeles to create,  
 21 seed, and promote content that appeared to be authentic on social media platforms and internet chat  
 22 forums. The Baldoni-Wayfarer team would then feed pieces of this manufactured content to unwitting  
 23 reporters, making content go viral in order to influence public opinion and thereby cause an organic pile-  
 24 on. To safeguard against the risk of Ms. Lively ever revealing the truth about Mr. Baldoni, the Baldoni-  
 25 Wayfarer team created, planted, amplified, and boosted content designed to eviscerate Ms. Lively's  
 26 credibility. They engaged in the same techniques to bolster Mr. Baldoni's credibility and suppress any  
 27 negative content about him.

19. On August 10, the day after release of the Film, Ms. Nathan's team reported that  
 they had "started to see shift on social, due largely to Jed and his team's efforts to *shift the narrative*"  
 against Ms. Lively.



Sat, Aug 10 at 10:25 AM

Hi team — so far, extremely limited pickup on Daily Mail or Page Six. We'll continue to keep an eye out and send pieces as needed, but so far it's been steady coverage on pure speculation. We've also started to see a shift on social, due largely to Jed and his team's efforts to shift the narrative towards shining a spotlight on Blake and Ryan. Again we'll continue to send links and screenshots but wanted to send an update in the meantime.

JA: Thanks [redacted] we are seeing the same thing.

Sat, Aug 10 at 11:32 AM

EXCLUDED: Thanks [redacted] I'd like to have a quick zoom today if we can all arrange without Justin. Is that possible for all?

JA: I can join, Just running around so might not be on camera but just let me know when

Happy to jump on too...likely off camera, no one needs to see this today. 🙄

Would a 6 PM ET call work? I could also circulate a dial in if that's easier for all vs a zoom.

JA: Should be fine on my end

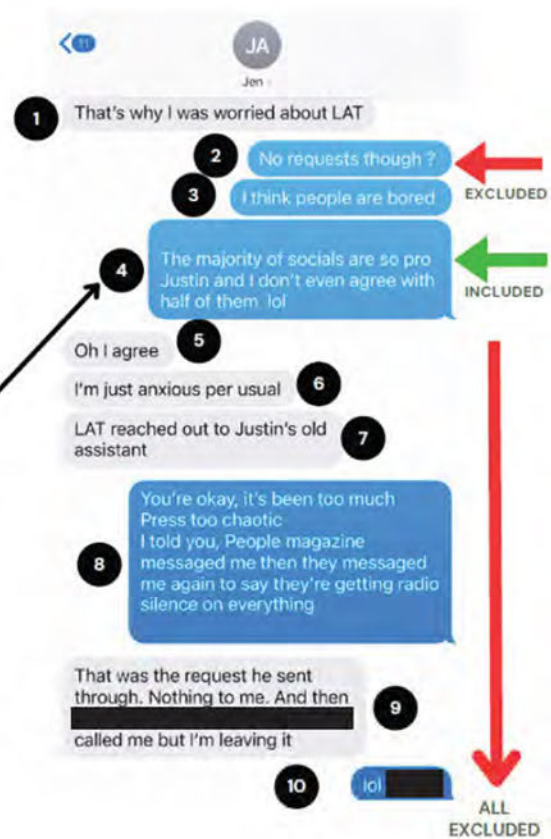
ALL EXCLUDED

14 19. On August 10, the day after release of the Film, Ms. Nathan's team reported that  
 15 they had "started to see shift on social, due largely to Jed and his team's efforts *to shift the narrative*"  
 16 against Ms. Lively.

17  
 18  
 19  
 20  
 21  
 22

23 20. That same day, Ms. Nathan noted that as part of this shift, "[t]he majority of socials  
 24 are so pro Justin *and I don't even agree with half of them [sic] lol.*"

25  
 26  
 27  
 28



21. Ms. Nathan then bragged to Ms. Abel that Mr. Baldoni "doesn't realise how lucky he is right now," by which they were referring to their successful efforts to shut down stories that would have revealed how Mr. Baldoni's behavior including "sexual connotations" on set had made cast and crew (beyond Ms. Lively) "uncomfortable."

25. [Redacted text block]

26. [Redacted text block]

JA  
Jen

Idi Roger

Yeah [Redacted] reached out 1

[Redacted] who just annoys me 2

And I saw that [Redacted] said limited pickup, but I've honestly not seen ANY from those two pieces 3

4 Just keep on giving nothing

5 Nothing not one thing from those pieces Edited

6 I mean, that was just a lot of work just talking everyone off the fucking ledge for those two pieces

7 Literally

8 I feel like I've been hit by a truck

9 And then after the weekend, people are going to move completely past it's boring now nothing came out for anyone

10 I bet you have it that constant anxiety

ALL EXCLUDED

21. Ms. Nathan then bragged to Ms. Abel that Mr. Baldoni "doesn't realise how lucky he is right now," by which they were referring to their successful efforts to shut down stories that would have revealed how Mr. Baldoni's behavior including "sexual connotations" on set had made cast and crew (beyond Ms. Lively) "uncomfortable."

25. [Redacted text block]

26. [Redacted text block]

JA  
Jen

And I'm like, we are dealing with a psychopath who literally called you a sexual predator

Let's all be happy with "difficult" 33

34 I have it on text message by the way

Unbelievable 35

36 Let's be really happy with difficult And he told him we took out misogynist

Leslie can't possibly believe that 37

38 Let's give it a day to Calm and let's call Jamey together tomorrow and we can explain to him a few things together

39 And socials are really really ramping up

40 In his favour, she must be furious

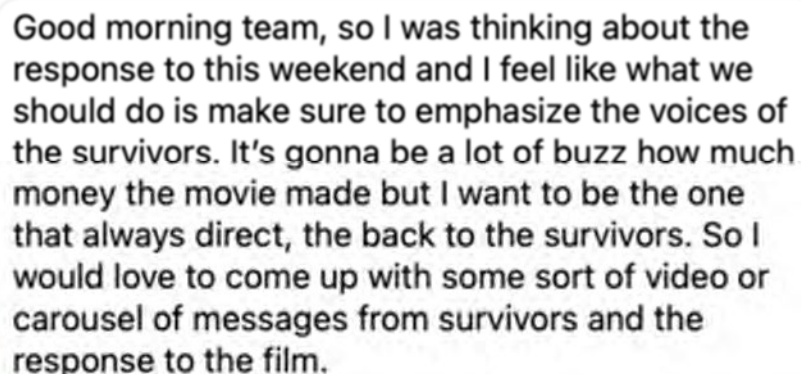
41 It's actually sad because it just shows you have people really want to hate someone

ALL EXCLUDED

286. In the Article, the Times writes: “[Lively’s] filing includes excerpts from thousands of pages of text messages and emails that she obtained through a subpoena. These and other documents were reviewed by the New York Times.” However, the Times failed to review and/or investigate the plethora of communications demonstrating that the Wayfarer Parties’ press strategy was at all times wholly defensive; they had no intention of “smearing” Lively and never did any such thing. What they did do was faithfully promote the Film and its message:

Sun, Aug 11 at 6:48 AM

Justin



Good morning team, so I was thinking about the response to this weekend and I feel like what we should do is make sure to emphasize the voices of the survivors. It’s gonna be a lot of buzz how much money the movie made but I want to be the one that always direct, the back to the survivors. So I would love to come up with some sort of video or carousel of messages from survivors and the response to the film.



Justin

Ok please

Monitor



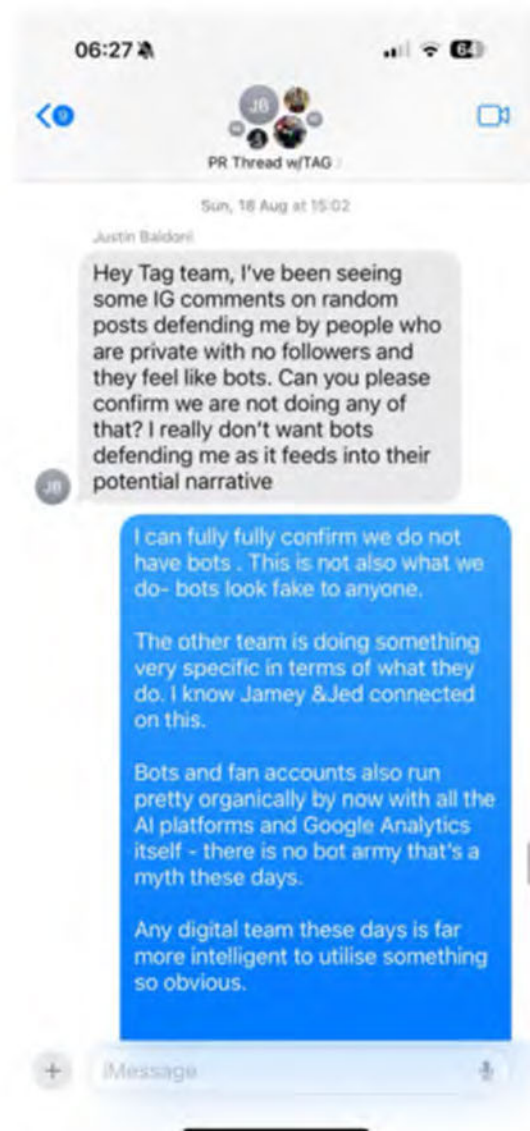
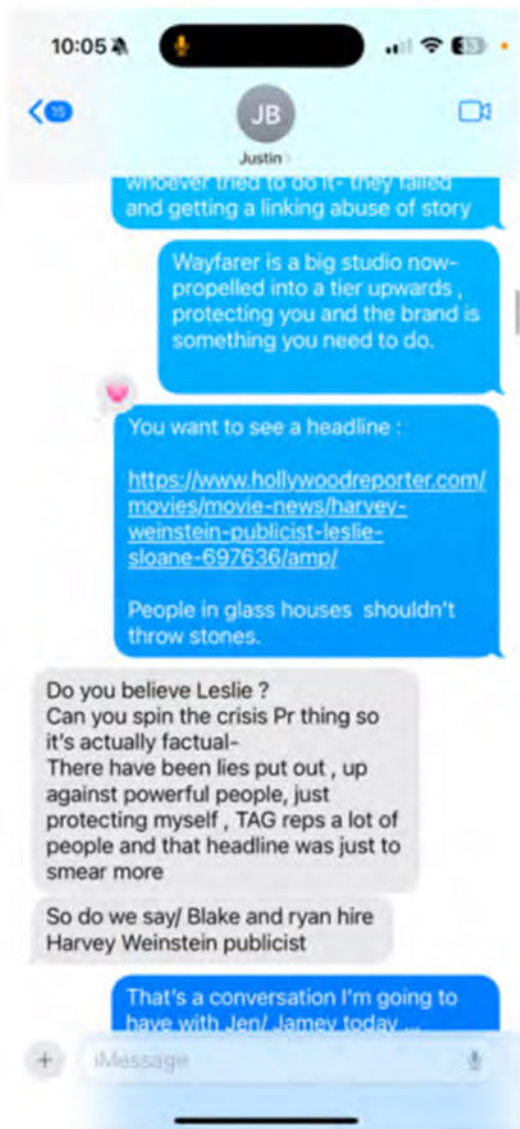
Things I'm more worried about is that we are planting these stories which is not true obviously

Jen Abel Old Number

Chiming in here. The people saying that there are bots and this is a PR play on your side is a minority voice compared to the thousands and thousands

who are calling it what it is, and reacting to Blake's own actions and interviews. We never want the action of the minority to dictate what we do on our end. We have to always look at the big picture which is still enormously on your side. But, I do see a want and need from fans to move on. People are now commenting that they are bored with the many articles still coming out about this drama. When we move on, they do too. So we need to find ways to keep elevating not just the DV reaction, but also the other things in your life like family, being back home, and wayfarer. That's not tone deaf in my opinion, but sends the message that you are focusing on what really matters and that's what will help with the Blake narrative too. My POV.

JA



Justin

Ok please  
Monitor



Things I'm more worried about is that we are  
planting these stories which is not true obviously

Jen Abel Old Number

Chiming in here. The people saying that there are  
bots and this is a PR play on your side is a minority  
voice compared to the thousands and thousands

who are calling it what it is, and reacting to Blake's  
own actions and interviews. We never want the  
action of the minority to dictate what we do on our  
end. We have to always look at the big picture  
which is still enormously on your side. But, I do see  
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now commenting that they are bored with the  
many articles still coming out about this drama.  
When we move on, they do too. So we need to find  
ways to keep elevating not just the DV reaction, but  
also the other things in your life like family, being  
back home, and wayfarer. That's not tone deaf in  
my opinion, but sends the message that you are  
focusing on what really matters and that's what will  
help with the Blake narrative too. My POV.



Message  
Mon, Aug 19 at 7:01 AM

Melissa Fadhari

Good morning.

Sharing with you a perfect example of why we  
don't use "bots"

I wouldn't even worry to think they've hired a team  
as a) nothing to find b) they hired an awful team  
which I've sent to our guy to track and pull so we  
have evidence of it.

This below should answer everyone's question on  
what a bot team looks like when every single  
comment suddenly skews in her favour in a  
nonsensical way

<https://www.instagram.com/p/C-2Tcmot4Mp/?igsh=MTC4MmMTYmI2Ng==>

At LEAST sprinkle them in.



She needs to fire her bot team.

Justin



How can we say somehow that we are not doing  
any of this - it looks like we are trying to take her  
down

Melissa Fadhari

It doesn't. They are doing all of this themselves  
and it's really obvious.



This is bots.

repost



range\_manning (1)  
Zainab after her bc of she is friends  
with David cannot move with Zainab off



Tue, Aug 13 at 12:53 PM

Melissa Nathan

Completely unsolicited story from tmz -  
Blake has a huge ego  
JB was liked by many cast and crew  
And this is her ego being bruised etc

MN

Jen Abel Old Number

The post has a similar tip

JA

Not from any of us obv

Melissa Nathan

MN

Totally not from us.

Jen Abel Old Number

These are clearly people on set coming out to  
defend JB which is good and we just let them do  
their thing

JA

Melissa Nathan


MN

The reporter told me her rep is working overtime



Melissa Nathan

Melissa TAG >



**Unearthed Blake Lively interview show her use slur for trans people**  
dailymail.co.uk

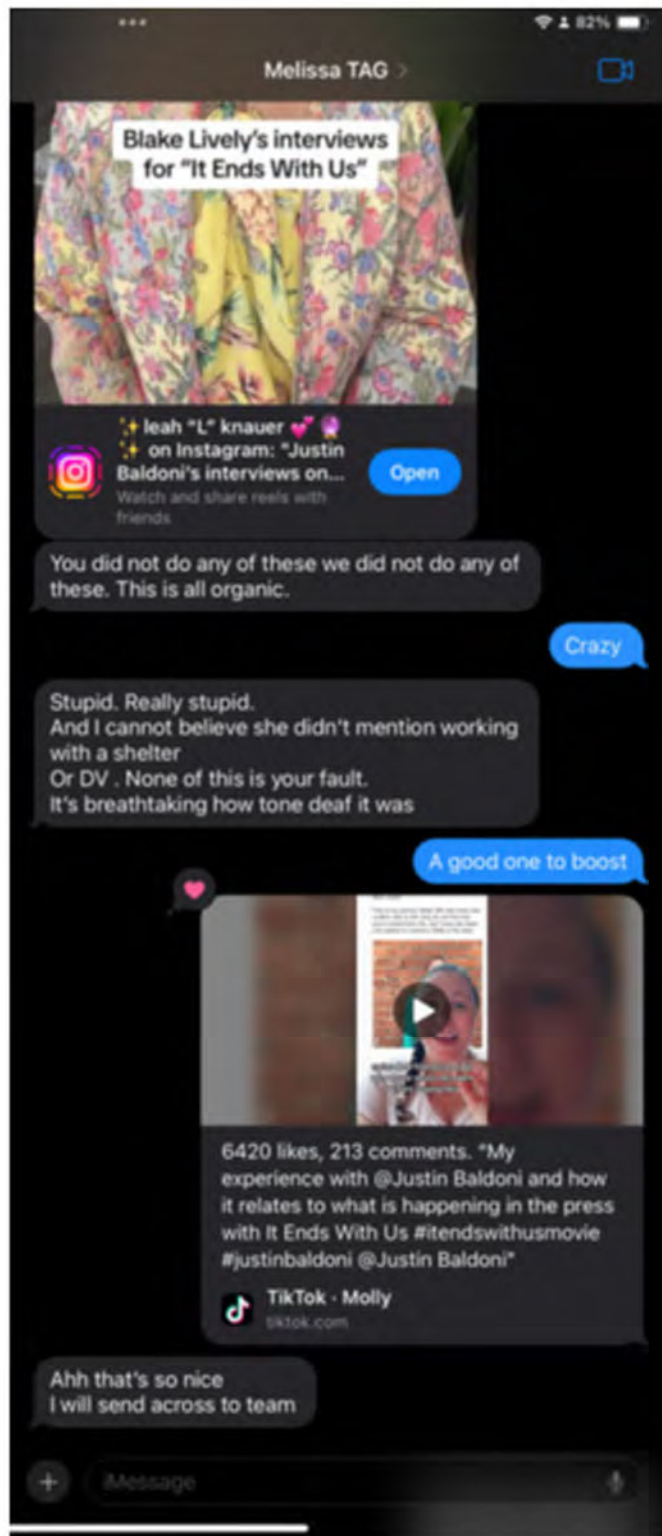
This just ran - obviously none of us knew about this either. But once media goes in, they go in.

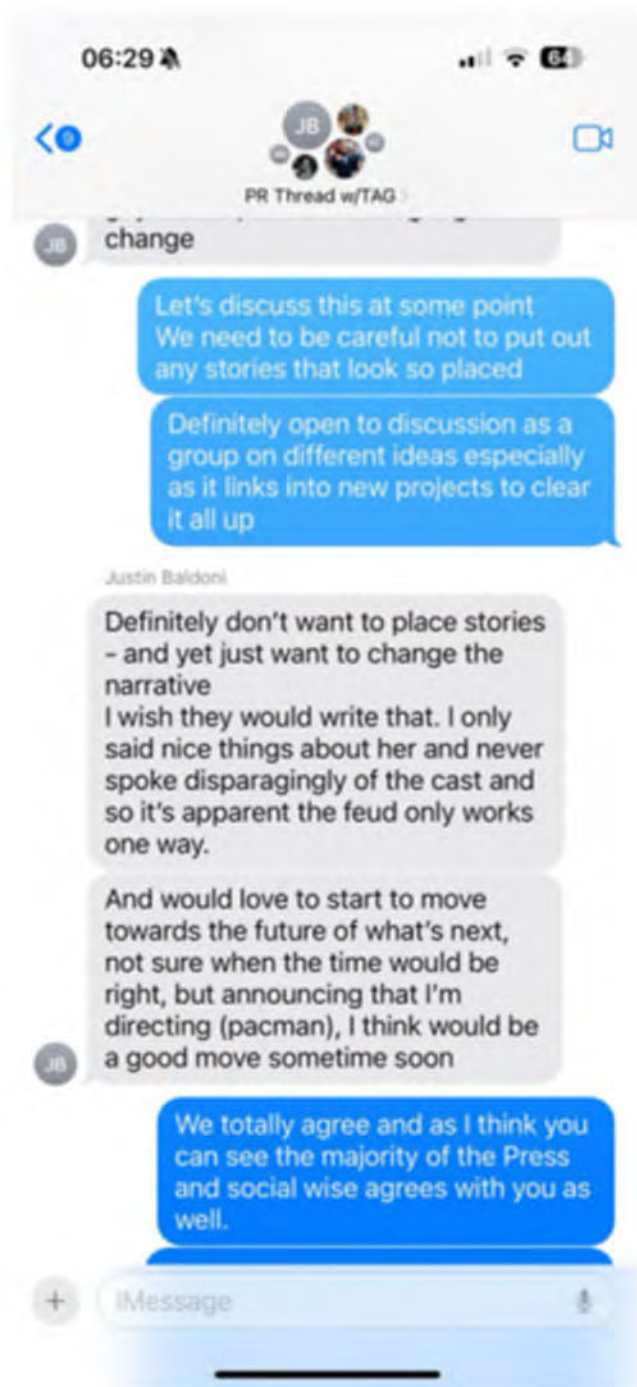
And the best thing we can do right now is be quiet. Let's get through this week together. Then just move on and back to regular planning with Instagram posts and thoughtful ideas and messages .

The content creators are on fire, and Justin, she has handed it to them all on a plate.

Just concentrate on the success of the movie, your family and your next project I have this weird feeling that she's going to reach out to you for a conversation in the next couple of weeks or he will.







287. Though the Times admits that it had access to “thousands” of relevant text messages and emails, its skewed reporting makes painfully obvious that it failed to substantiate the false accusations hurled by Lively. Indeed, the objective evidence refutes any allegation that the Wayfarer Parties engaged in a smear campaign to “bury” Lively and “destroy” her reputation.

Lively's wound was entirely self-inflicted. That the Wayfarer Parties retained crisis public relations to defend against Lively's unrelenting assault does not change this fact.

288. The *New York Times* is one of the most widely read newspapers in the United States and, once upon a time, served as a primary newspaper of record, publishing "all the news that's fit to print." The Times was considered a paragon of journalistic integrity and excellence, the gold-standard for journalism in the United States, and a highly respected new outlet internationally.

289. For generations, the paper's historical influence on the socio-political and cultural life of the country and its institutions could not be overstated. Americans long relied on the *Times* as a source of accurate and balanced news reporting. Viewpoint-based commentary was expressly excluded from news stories. Indeed, for years, Americans grew to expect that the *Times* would, as legendary *Times* Executive Editor A.M. Rosenthal said, "tell it straight" or, in other words, simply report the news without embellishing or driving it. For much of its storied history, whether it was the civil rights movement, the Vietnam War, Watergate or other political and cultural issues, through its objective, investigative reporting and the diverse views presented on its Op-Ed pages, the *Times* strove to inform America through high journalistic standards, accuracy and fairness. The publication has won far more Pulitzer Prizes than any other media company in U.S. history, with its first being awarded more than 100 years ago.

290. But over the last 20 years, *Times* reporters have ever more frequently veered spectacularly from their own journalistic guidelines. As a result, it has become commonplace to find *New York Times* stories containing egregious factual errors or infected with bias. Such lapses have contributed to public distrust of the *Times* and a landscape where partisan actors can cry "fake news" with some justification.

291. But the *New York Times* still wields a powerful and influential megaphone in the media and greater society. It is, therefore, under a solemn obligation to do the work necessary to get its reporting right. As reporters at the *Times* well know, getting it wrong can lead to disastrous outcomes for story subjects, including financial, professional, and reputational ruin. And *New York Times* sets the narrative and tone for other news organizations, amplifying the impact of its mistakes.

292. The instant case is emblematic of the *Times* having “lost its way”, as the facts here make plain that the *Times* failed to follow its own journalistic standards, rushed to judgment, and, with careless disregard, published a story accusing the Wayfarer Parties of waging a “smear campaign” against Lively, causing a feeding frenzy based on a demonstrably false premise.

293. The instant case is emblematic of the *Times* having “lost its way”, as the facts here make plain that the *Times* failed to follow its own journalistic standards, rushed to judgment, and, with careless disregard, published a story accusing the Wayfarer Parties of waging a “smear campaign” against Lively, causing a feeding frenzy based on a demonstrably false premise.

294. At 2:16 a.m. (EST), the Wayfarer Parties’ legal representatives responded as follows:

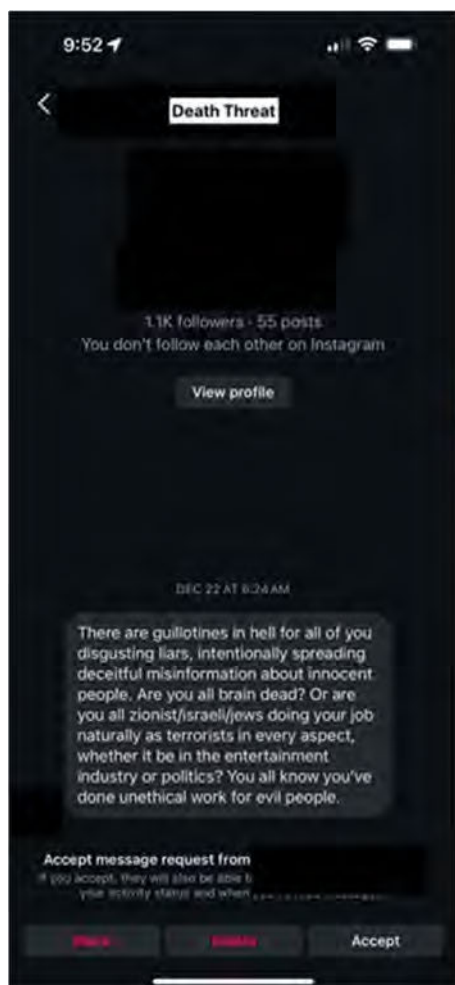
It is shameful that Ms. Lively and her representatives would make such serious and categorically false accusations against Mr. Baldoni, Wayfarer Studios and its representatives, as yet another desperate attempt to ‘fix’ her negative reputation which was garnered from her own remarks and actions during the campaign for the film; interviews and press activities that were observed publicly, in real time and unedited, which allowed for the internet to generate their own views and opinions. These claims are completely false, outrageous and intentionally salacious with an intent to publicly hurt and rehash a narrative in the media. Wayfarer Studios made the decision to proactively hire a crisis manager prior to the marketing campaign of the film, to work alongside their own representative with Jonesworks employed by Stephanie Jones, due to the multiple demands and threats made by Ms. Lively during production which included her threatening to not showing up to set, threatening to not promote the film, ultimately leading to its demise during release, if her demands were not met. It was also discovered that Ms. Lively enlisted her

own representative, Leslie Sloan with Vision PR, who also represents Mr. Reynolds, to plant negative and completely fabricated and false stories with media, even prior to any marketing had commenced for the film, which was another reason why Wayfarer Studios made the decision to hire a crisis professional to commence internal scenario planning in the case they needed to address. The representatives of Wayfarer Studios still did nothing proactive nor retaliated, and only responded to incoming media inquiries to ensure balanced and factual reporting and monitored social activity. What is pointedly missing from the cherry-picked correspondence is the evidence that there were no proactive measures taken with media or otherwise; just internal scenario planning and private correspondence to strategize which is standard operating procedure with public relations professionals.

295. At 10:11 a.m. (EST) on December 21, 2024, the Times published the Article. Notwithstanding that the Times was made aware of the egregiously defamatory allegations contained therein, it proceeded with publication without further inquiry. Indeed, in its rush to publish a one-sided, unsubstantiated story on behalf of Lively, the Times got it dramatically wrong. The aftershocks have been disastrous for the Wayfarer Parties, and they now, reluctantly and knowing the damage cannot be fully undone, bring suit to hold the Times accountable for its egregious misfire.

296. When Wayfarer and Baldoni hired Lively to appear in the film, they did not anticipate that she would execute a hostile takeover of the entire project. Lively's cynical abuse of baseless sexual harassment allegations to assert unilateral control over every aspect of the production was both strategic and manipulative. Simultaneously, her public image suffered as a result of a series of high-profile blunders, which she tried to deflect by blaming the Wayfarer Parties for the public's prying interest into the foibles of an A-list celebrity. Alongside the Times, Lively orchestrated a malicious attack on the reputations, careers, and personal lives of the Wayfarer Parties, subjecting them to public humiliation, threats, and vitriol. This lawsuit seeks to hold the Lively Parties accountable for their defamation campaign.





297. Plainly, the Lively Parties had thousands of text messages and communications. They had all the pieces to put together what *really* happened, and they would not even have had to search particularly hard to do so. They chose not to, because that did not serve the goal of trashing the Wayfarer Parties in the ultimate power play by wealthy celebrities who have not heard the word “no” for decades.

298. At bottom, the case is a simple one. Lively used her power to steal a movie from its director and production studio. Then she held them hostage to her incessant demands by extortionate threats to destroy what they had left. All the while, she failed to understand the heart and soul of the movie she stole and the book it was based on, let alone the intensely personal

impact the book had on millions worldwide. When her thoughtless promotions fell flat because they focused on flowery glamour and cross-merchandising opportunities for her own brands, rather than on centering the voices of survivors, she finally got a taste of accountability, and she did not care for it. She made one final demand to the Wayfarer Parties: that they finally and forever fall on the sword for her by apologizing for things they had not done, killing their future prospects in the process. When they refused, the Lively Parties' gloves came off, and they used their power and resources to try to take down the Wayfarer Parties for good by coordinating with Jones and Sloane, master practitioners of the dark arts of public relations, in an intricately planned character assassination plot ultimately put into action by the New York Times. They nearly pulled it off, too.

299. the Lively Parties have cost the Wayfarer Parties their film, their reputations, their future prospects, even their talent agency. It is time to rebalance the scales.

### **PARTIES**

300. Wayfarer Studios LLC is, and at all relevant times herein was, a Delaware limited liability company with its principal place of business in Los Angeles, California. None of Wayfarer's members are citizens of New York. All of Wayfarer's members are citizens of California.

301. Justin Baldoni is, and at all relevant times herein was, an individual residing in the County of Los Angeles, California.

302. Jamey Heath is, and at all relevant times herein was, an individual residing in the County of Los Angeles, California.

303. It Ends With Us Movie LLC is, and at all relevant times herein was, a California limited liability company with its principal place of business in California. No members of It Ends

With Us Movie LLC are citizens of New York. All members of It Ends With Us Movie LLC are citizens of California.

304. Melissa Nathan is, and at all relevant times here in was, an individual residing in the County of Los Angeles, California.

305. Jennifer Abel is, and at all relevant times was, an individual residing in the County of Los Angeles, California.

306. Steve Sarowitz is, and at all relevant times herein was, an individual residing in the County of Lake, Illinois.

307. Blake Lively is, and at all relevant times herein was, an individual residing in New York, New York.

308. Ryan Reynolds is, and at all relevant times herein was, an individual residing in New York, New York.

309. Upon information and belief, Leslie Sloane is, and at all relevant times herein was, an individual residing in New York, New York.

310. Vision PR, Inc. is, and at all relevant times herein was, a New York corporation with its principal place of business in New York, New York.

311. The New York Times Company is, and at all relevant times herein was, a New York corporation with its principal place of business in New York, New York.

### **JURISDICTION AND VENUE**

312. This Court has original jurisdiction over the claims for relief asserted in this cross-complaint pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and no Lively Party is a citizen of the same state as any Wayfarer Party.

313. This Court may exercise personal jurisdiction over the Lively Parties pursuant to § 301 of the New York Civil Practice Law and Rules because all of the Lively Parties systematically and continuously conduct and solicit business within New York and have availed themselves of the privileges of conducting business in the State of New York.

314. This Court may exercise personal jurisdiction over the Lively Parties pursuant to § 302 of the New York Civil Practice Law and Rules, including because, upon information and belief, all of the Lively Parties transact and solicit business within the State, have committed the tortious acts described in this Complaint within the State, and/or have committed such acts outside of the State causing injury to the Wayfarer Parties within the State.

315. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and (c), because a substantial part of the events or omissions giving rise to these claims occurred in this District and because the Lively Parties are subject to personal jurisdiction in this District.

### **FIRST CAUSE OF ACTION**

**(Civil Extortion)<sup>27</sup>**

***Against Lively, Reynolds, Sloane, and Vision***

316. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

317. The Lively Parties made threats to the Wayfarer Parties that they knew to be wrongful, including threats to breach contracts, defame the Wayfarer Parties, and injure

---

<sup>27</sup> Lively has contended that California law applies to any dispute involving the Wayfarer Parties or the Film. Without conceding that Lively's statutory claims are properly brought, and with reservation of all rights and remedies, the Wayfarer Parties assert their claims under the substantive laws of the State of California.

318. The Lively Parties' threats included demands that money, property, services, or other sources of value be conferred upon the Lively Parties without consideration or contractual entitlement thereto.

319. The Wayfarer Parties complied with the wrongful demands.

320. The Wayfarer Parties were harmed.

321. The Lively Parties' wrongful threats and demands were a substantial factor in causing the Wayfarer Parties' harm.

322. Upon information and belief, each of the Lively Parties was aware that the others planned to commit the tort of extortion against the Wayfarer Parties; and that each of the Lively Parties agreed with one another and intended that the wrongful acts pleaded herein be committed. Accordingly, each of the Lively Parties is equally liable to the Wayfarer Parties for the tort of extortion by reason of their conspiracy to commit the tort.

323. The Lively Parties have engaged in the above-alleged conduct with oppression, fraud, and malice. Accordingly, the Wayfarer Parties are entitled to an award of punitive and exemplary damages in an amount to be proved at trial.

## **SECOND CAUSE OF ACTION**

### **(Defamation)**

#### ***Against Lively, Reynolds, Sloane, Vision, and New York Times***

324. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

325. The Lively Parties made one or more statements to persons other than the Wayfarer Parties, including without limitation to the *New York Times*, to the effect that the Wayfarer Parties engaged in, permitted, and/or failed to prevent sexually inappropriate conduct toward Lively and



others, and that the Wayfarer Parties retaliated against Lively and others for reporting the alleged sexual misconduct including by propagating false and misleading narratives about Lively for the purpose of damaging her image and reputation.

326. The persons to whom the Lively Parties made these statements reasonably understood that these statements were made about the Wayfarer Parties.

327. The statements made by the Lively Parties were intended to and did have the effect of exposing the Wayfarer Parties to hatred, contempt, ridicule, or obloquy, or of causing them to be shunned or avoided, or of having a tendency to injury them in their occupations. Specifically, the persons to whom the Lively Parties made the statements reasonably understood the statements to mean that the Wayfarer Parties engaged in, permitted, and/or failed to prevent sexually inappropriate conduct toward Lively and others, and that the Wayfarer Parties retaliated against Lively and others for reporting the alleged sexual misconduct including by propagating false and misleading narratives about Lively for the purpose of damaging her image and reputation.

328. The statements made by the Lively Parties about the Wayfarer Parties were false. Furthermore, the Lively Parties knew the statements were false, or had serious doubts about the truth of the statements.

329. The Lively Parties' false statements about the Wayfarer Parties to third parties were a substantial factor in causing harm to the Wayfarer Parties' property, business, trade, profession, and/or occupation; expenses the Wayfarer Parties had to pay as a result of the defamatory statements; harm to the Wayfarer Parties' reputations; and, with respect to Baldoni and Heath, shame, mortification, and hurt feelings.

330. Upon information and belief, each of the Lively Parties was aware that the others planned to commit the tort of defamation against the Wayfarer Parties; and that each of the Lively

Parties agreed with one another and intended that the wrongful acts pleaded herein be committed. Accordingly, each of the Lively Parties is equally liable to the Wayfarer Parties for the tort of defamation by reason of their conspiracy to commit the tort.

331. The Lively Parties have engaged in the above-alleged conduct with oppression, fraud, and malice. Accordingly, the Wayfarer Parties are entitled to an award of punitive and exemplary damages in an amount to be proved at trial.

### **THIRD CAUSE OF ACTION**

**(False Light Invasion of Privacy – California Const., Art. I, § 1)**

***By Baldoni, Heath, Nathan, Abel, and Sarowitz Against Lively, Reynolds, Sloane, Vision, and  
New York Times***

332. The Wayfarer Parties Baldoni, Heath, Nathan, Abel, and Sarowitz hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

333. As alleged herein above, the Lively Parties Lively, Reynolds, Sloane, Vision, and New York Times publicly disclosed information or material regarding the Wayfarer Parties Baldoni, Heath, Nathan, Abel, and Sarowitz's professional decisions, moral character, private life, and family, which showed Baldoni, Heath, Nathan, Abel, and Sarowitz in a false light.

334. The false light created by the disclosures of the Lively Parties would be highly offensive and objectionable to a reasonable person in the Wayfarer Parties' position, in that it made Baldoni, Heath, Nathan, Abel, and Sarowitz the objects of scorn, pity, ridicule, humiliation, and other suffering.

335. These Lively Parties knew the public disclosures would create a false impression about Baldoni, Heath, Nathan, Abel, and Sarowitz or acted with reckless disregard for the truth.

336. As a direct and proximate result of the said publicity and false and misleading disclosures, Baldoni, Heath, Nathan, Abel, and Sarowitz sustained harm, including to their business and professions, as well as their reputations. Further, Baldoni, Heath, Nathan, Abel, and Sarowitz have suffered, and continue to suffer, from grief and anxiety as a result of the wanton destruction of their public reputations and characters. As a further direct and proximate result of the said disclosures, the Wayfarer Parties Baldoni, Heath, Nathan, Abel, and Sarowitz have suffered loss of income and interference with future income.

337. The conduct of the Lively Parties described herein was a substantial factor in causing the Wayfarer Parties Baldoni, Heath, Nathan, Abel, and Sarowitz's harm, constituted a serious invasion of their rights to privacy, and was an egregious breach of social norms that shocks the conscience.

338. Upon information and belief, each of the Lively Parties was aware that the others planned to commit the tort of false light invasion of privacy against the Wayfarer Parties Baldoni, Heath, Nathan, Abel, and Sarowitz; and that each of the Lively Parties agreed with one another and intended that the wrongful acts pleaded herein be committed. Accordingly, each of the Lively Parties is equally liable to the Wayfarer Parties Baldoni, Heath, Nathan, Abel, and Sarowitz for the tort of false light invasion of privacy by reason of their conspiracy to commit the tort.

339. The Lively Parties have engaged in the above-alleged conduct with oppression, fraud, and malice. Accordingly, the Wayfarer Parties Baldoni, Heath, Nathan, Abel, and Sarowitz are entitled to an award of punitive and exemplary damages in an amount to be proved at trial.

**FOURTH CAUSE OF ACTION**

**(Breach of Implied Covenant of Good Faith and Fair Dealing)**

***Against Lively***

340. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

341. Lively and the Wayfarer Parties entered into a contract by which Lively agreed to perform as an actor in the Film *It Ends With Us*.

342. The Wayfarer Parties did all, or substantially all, of the significant things that the contract required them to do, or, in the alternative, the Wayfarer Parties were excused from having to do those things.

343. All of the conditions required, if any, for Lively's performance had occurred or, in the alternative, were excused.

344. Lively engaged in conduct that prevented the Wayfarer Parties from receiving the benefits contemplated under the contract. Specifically, Lively interfered with the production by making repeated threats and demands in order to seize creative control over the production, editing, and marketing of the Film, such that the Lively Parties were deprived of the opportunity to produce, edit, and market a film as contemplated by the contract.

345. By doing so, Lively did not act fairly and in good faith.

346. The Wayfarer Parties were harmed by Lively's conduct.

**FIFTH CAUSE OF ACTION**

**(Intentional Interference with Contractual Relations)**

***Against Reynolds and Lively***

347. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

348. There was a contract between the Wayfarer Parties and William Morris Endeavor (“WME”).

349. The Lively Parties Lively and Reynolds knew of the contract.

350. The Lively Parties Lively and Reynolds prevented performance of the contract or made performance more expensive or difficult. Specifically, upon information and belief, Lively and Reynolds made threats and/or demands to induce WME to cease performing under its contract with the Wayfarer Parties.

351. The Lively Parties Lively and Reynolds intended to disrupt the performance of this contract or, in the alternative, knew that disruption of performance was certain or substantially certain to occur.

352. The Wayfarer Parties were harmed.

353. The Lively Parties’ conduct was a substantial factor in causing the Wayfarer Parties’ harm.

354. Upon information and belief, each of the Lively Parties Lively and Reynolds was aware that the others planned to commit the tort of intentional interference with contractual relations against the Wayfarer Parties; and that each of the aforementioned Lively Parties agreed with one another and intended that the wrongful acts pleaded herein be committed. Accordingly,



each of the aforementioned Lively Parties is equally liable to the Wayfarer Parties for the tort of intentional interference with contractual relations by reason of their conspiracy to commit the tort.

355. The Lively Parties Lively and Reynolds have engaged in the above-alleged conduct with oppression, fraud, and malice. Accordingly, the Wayfarer Parties are entitled to an award of punitive and exemplary damages in an amount to be proved at trial.

### **SIXTH CAUSE OF ACTION**

#### **(Intentional Interference with Prospective Economic Advantage)**

##### ***Against Reynolds and Lively***

356. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

357. The Wayfarer Parties and WME were in an economic relationship that probably would have resulted in an economic benefit to the Wayfarer Parties.

358. The Lively Parties Lively and Reynolds knew of the relationship.

359. The Lively Parties Lively and Reynolds engaged in wrongful conduct, specifically, by making threats and/or demands that WME terminate its economic relationship with the Wayfarer Parties.

360. By engaging in this conduct, the Lively Parties intended to disrupt the relationship, or, in the alternative, knew that disruption of the relationship was certain or substantially certain to occur.

361. The relationship was disrupted.

362. The Wayfarer Parties were harmed.

363. The Lively Parties' conduct was a substantial factor in causing the Wayfarer Parties' harm.

364. Upon information and belief, each of the Lively Parties Lively and Reynolds was aware that the others planned to commit the tort of intentional interference with prospective economic relations against the Wayfarer Parties; and that each of the aforementioned Lively Parties agreed with one another and intended that the wrongful acts pleaded herein be committed. Accordingly, each of the aforementioned Lively Parties is equally liable to the Wayfarer Parties for the tort of intentional interference with prospective economic relations by reason of their conspiracy to commit the tort.

365. the Lively Parties Lively and Reynolds have engaged in the above-alleged conduct with oppression, fraud, and malice. Accordingly, the Wayfarer Parties are entitled to an award of punitive and exemplary damages in an amount to be proved at trial.

### **SEVENTH CAUSE OF ACTION**

#### **(Negligent Interference with Prospective Economic Advantage)**

#### ***Against Reynolds and Lively***

366. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

367. The Wayfarer Parties and WME were in an economic relationship that probably would have resulted in an economic benefit to the Wayfarer Parties.

368. The Lively Parties Lively and Reynolds knew of the relationship.

369. The Lively Parties Lively and Reynolds knew or should have known that this relationship would be disrupted if they failed to act with reasonable care.

370. The Lively Parties failed to act with reasonable care.

371. The Lively Parties engaged in wrongful conduct by threatening and/or making demands that WME sever its economic relationship with the Wayfarer Parties.

372. The relationship was disrupted.

373. The Wayfarer Parties were harmed.

374. The Lively Parties' wrongful conduct was a substantial factor in causing the Wayfarer Parties' harm.

## **EIGHTH CAUSE OF ACTION**

### **(Promissory Fraud)**

#### ***Against The New York Times Company***

375. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

376. On or about Friday, December 20, 2024, at approximately 9:45 p.m. (EST), Twohey of the Times emailed the Wayfarer Parties concerning the forthcoming publication of the Article. Twohey laid out a series of highly inflammatory allegations involving the Wayfarer Parties purportedly derived from a review of their private communications that the Times had taken possession of.

377. The Times offered the Wayfarer Parties until noon (EST) the following day to respond to the allegations, provide additional relevant information, and correct inaccuracies.

378. The Wayfarer Parties are informed and believe, and based thereon allege, that the Times had been coordinating with Lively and/or her team to align the publication of the Article with the filing of Lively's CRD Complaint, a document that was not publicly available and had to have been provided to the Times by Lively and/or her team.

379. Although the Wayfarer Parties strongly believed that the Times had not afforded them remotely enough time to meaningfully respond to the allegations, correct inaccuracies, or even verify the authenticity of their unlawfully obtained private communications, they fully

intended to make use of that brief window to correct the record as best they could. the Wayfarer Parties justifiably relied on the express representation of the Times that the Wayfarer Parties had until noon (EST) on December 21, 2024, to do so.

380. However, the Times published the Article without warning at 10:11 a.m. (EST), cutting off the Wayfarer Parties' ability to do so and catalyzing a feeding frenzy.

381. The Wayfarer Parties are informed and believe, and based thereon allege, that the Times reached out to the Wayfarer Parties to pay lip service to journalistic ethics and fundamental fairness and never intended—or wanted—for the Wayfarer Parties to respond.

382. The Wayfarer Parties are informed and believe, and based thereon allege, that the Times intended for the Wayfarer Parties to rely on its false promise, which the Wayfarer Parties did, in fact, do to their detriment.

383. As a direct and proximate result of the above-described conduct of the Times, the Wayfarer Parties have been harmed in an amount to be proven at trial.

### **NINTH CAUSE OF ACTION**

#### **(Breach of Implied-in-Fact Contract)**

#### ***Against The New York Times Company***

384. The Wayfarer Parties hereby repeat, reiterate, re-allege, and incorporate by reference each and every allegation of the Complaint as if set forth fully herein.

385. As alleged herein, on or about Friday, December 20, 2024, at approximately 9:45 p.m. (EST), Twohey of the Times emailed the Wayfarer Parties concerning the forthcoming publication of the Article. Twohey laid out a series of highly inflammatory allegations involving the Wayfarer Parties, purportedly derived from a review of their private communications that the Times had taken possession of.

386. Through their express written words, the Times offered the Wayfarer Parties until noon (EST) the next day to respond to the allegations, provide additional relevant information, and correct inaccuracies.

387. The Wayfarer Parties accepted the Times' offer, which created an implied-in-fact contract between the parties whereby the Times would refrain from publication for a brief period in exchange for a substantive response to the allegations, additional relevant information, and confirmation of the authenticity, accuracy, and completeness of the relied-upon communications.

388. The Wayfarer Parties performed in accordance with this mutual understanding.

389. The Times breached the implied-in-fact contract by publishing the Article at 10:11 a.m. (EST), in direct violation of their express representation to the Wayfarer Parties.

390. As a direct and proximate result of the Times' foregoing breach, the Wayfarer Parties were deprived of the benefits of the bargain in that they lost the opportunity to meaningfully assess and respond to a false, misleading, extremely inflammatory portrayal of their actions and character.

391. As a direct and proximate result thereof, the Wayfarer Parties suffered harm in an amount to be proven at trial.

#### **PRAYER FOR RELIEF**

WHEREFORE, the Wayfarer Parties pray for the following relief:

1. For a money judgment representing compensatory damages including consequential damages, lost wages, earnings, and all other sums of money, together with interest on those amounts, in an amount to be proven at trial but in no event less than \$400,000,000;

2. For an award of money judgment for mental pain and anguish and severe and serious emotional distress, as applicable, in an amount to be proven at trial;



3. For pre- and post-judgment interest;
4. For punitive damages according to proof;
5. For attorney's fees and costs incurred by the Wayfarer Parties, as applicable; and
6. For such other legal and equitable relief as the Court deems appropriate.

**DEMAND FOR JURY TRIAL**

The Wayfarer Parties demand a jury trial on all causes of action so triable.

Dated: January 31, 2025  
New York, NY

Respectfully submitted,

**MEISTER SEELIG & FEIN PLLC**

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Dated: January 31, 2025  
Los Angeles, CA

**LINER FREEDMAN TAITELMAN  
+ COOLEY**

By: /s/ Bryan Freedman  
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\* *admitted pro hac vice*